

Representation - Draft Modification Report UNC 0775S

Amendment to the Requirement to Conduct the Transporting Britain's Energy Consultation

Responses invited by: **5pm on 08 October 2021**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Ashley Adams
Organisation:	National Grid NTS
Date of Representation:	08/10/2021
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

As proposer of this UNC Modification, National Grid supports its implementation.

Due to the evolution of the way in which we collect information to feed into the Gas Ten Year Statement, and the increased reliance on Future Energy Scenarios (FES) data provision, we no longer feel that the absolute requirement to run the Transporting Britain's Energy consultation is necessary as detailed within the UNC Modification Proposal. We believe that the implementation of this UNC Modification, and the resulting removal of the absolute requirement to conduct the Transporting Britain's Energy consultation process will result in efficiency and resource savings that can be realised for both National Grid and the wider industry.

Users will no longer have to provide information to National Grid NTS through the Transporting Britain's Energy annual process when that same information and more, can be gained via the FES process, unless there is a need to do so, which the UNC Modification Proposal continues to provide.

Therefore, the implementation of this UNC Modification Proposal will ensure that the Transporting Britain's Energy rules contained within UNC are appropriate for the information collection process of today, better reflecting current practice, whilst maintaining the optionality to utilise the consultation in the future should the need arise. As a result, we believe that the implementation of the UNC Modification furthers Relevant Objective (f), in promoting efficiency in the implementation and administration of the Code as outlined in the Draft Modification Report.

Self-Governance Statement:

National Grid NTS supports the application of Self Governance procedures as set out in the Draft Modification Report. This UNC Modification Proposal seeks only to remove the obligation for NGG NTS to conduct the Transporting Britain's Energy consultation at a specific time each year and replace it with an option to conduct the process in the event that it is required. We therefore believe that the UNC Modification will not have a material impact on consumers, competition, operation of the pipeline systems, matters relating to sustainable development, safety or security of supply, the management of market or network emergencies, governance procedures, and will not discriminate between different classes of parties to the UNC.

Implementation:

We do not require a lead time for implementation of this UNC Modification Proposal, therefore, as self-governance procedures are proposed, implementation could be sixteen business days following a decision to implement.

Impacts and Costs:

National Grid will not incur any specific additional costs as a consequence of the implementation of this UNC Modification Proposal.

Legal Text:

We have no further changes proposed to the legal text and are satisfied that it delivers the intent of the solution.

Modification Panel Members have requested that the following questions are addressed:

Q1: Consider any impact on the Future Energy Scenarios (FES) process from the separation of the Electricity System Operator (ESO) and National Grid.

National Grid ESO and NGG NTS are already legally separate, and the necessary information to support the production of the Gas Ten Year Statement is provided to NGG NTS from National Grid ESO, at present, through a contractual General Services Agreement. We do not foresee either any significant changes, or the ability for short notice amendments to that agreement in the coming years, regardless of any additional business separation that may result from the sale of the UK Gas Transmission business or any Future System Operator role. However, the UNC Modification proposal includes the retention of the ability for NGG NTS to issue the Transporting Britain's Energy consultation should the need arise as a precautionary measure to ensure compliance with obligations associated with the production of the Gas Ten Year Statement.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

We have not identified any errors or omissions.

Please provide below any additional analysis or information to support your representation

None.