

UNC Final Modification Report	At what stage is this document in the process?
<h1>UNC 0810S:</h1> <h2>Amendment of Transportation Principal Document Section V 14.1.1 and Annex-V5 to reflect updated Theft of Gas Process</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 8px;">01</span> Modification         </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 8px;">02</span> Workgroup Report         </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 8px;">03</span> Draft Modification Report         </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 8px;">04</span> Final Modification Report         </div> </div>
<p><b>Purpose of Modification:</b></p> <p>The intent of this Modification is to remove Clause 14.1.1 and Annex V-5 'Shipper TOG Report' currently within TPD Section V of the Uniform Network Code (UNC), in alignment with the implementation of UNC Modification 0734S - Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers.</p>	
<p><b>Next Steps:</b></p> <p>The Panel determined that this Self-Governance Modification should be implemented.</p>	
<p><b>Impacted Parties:</b></p> <p>Low impact to Shippers, DNOs and CDSP.</p> <p>This is a minor update to UNC to ensure the Shipper theft reporting aligns with that to be introduced once Modification 0734S - Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers, is implemented.</p>	
<p><b>Impacted Codes:</b></p> <p>This Modification will impact UNC TPD Section V only.</p>	

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Timetable			
<b>Modification timetable:</b>			
Pre-Modification Discussed	24 March 2022		
Date Modification Raised	01 June 2022		
Draft Modification Report issued for consultation	24 June 2022		
Consultation Close-out for representations	15 July 2022		
Final Modification Report available for Panel	18 July 2022		
Modification Panel decision	21 July 2022		

## 1 Summary

### What

This Modification seeks to amend UNC TPD Section V, Clause 14 of the UNC by removing current Clause 14.1.1 and the 'Shipper TOG Report Data' in Annex-V5.

Once [UNC Modification 0734S – Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers](#) is implemented (date to be confirmed), the "Shipper TOG Report" referenced in TPD V 14.1.1 and detailed in Annex V-5, will no longer be required. As Modification 0734S introduces a new process to help ensure that valid confirmed theft data received from Suppliers via the Retail Energy Code Company (RECCo), under this new theft of gas process, the current "Shipper TOG Report" will therefore become redundant. The 'Shipper TOG Report Data' within Annex V-5 and the reference to it within Clause 14.1.1 should be removed.

### Why

Following the approval of UNC Modification 0734S in February 2022, it has been identified that the report; "Shipper TOG Report" referenced in UNC TPD V Clause 14.1.1 and detailed in Annex V-5, will become redundant. A new Performance Assurance Report Register (PARR) Report will be created to go to the Performance Assurance Committee (PAC), to report on the updated Shipper theft of gas process (as per Modification 0734S), and this will replace the current "Shipper TOG Report".

This Modification is required to update TPD Section V, Clause 14 of the UNC to remove current Clause 14.1.1 and the 'Shipper TOG Report Data' in Annex-V5 as this relates only to the current theft of gas process and will not be applicable once Modification 0734S is implemented (date to be confirmed).

### How

This Modification seeks to amend TPD Section V, Clause 14 of the UNC to remove current Clause 14.1.1 and the 'Shipper TOG Report Data' in Annex-V5.

Please note, there is no requirement to add any further references to the new PAC report to be added to the PARR as this was covered under Modification 0734S.

To confirm, the implementation date for this Modification must align with Modification 0734S implementation to ensure the legacy theft reporting; "Shipper TOG Report" is removed when the new theft process is in place and the legacy report is redundant.

## 2 Governance

### Justification Self-Governance

This Modification should be considered capable of being assigned as Self-Governance as it is considered to be a housekeeping Modification required as a result of an error. This Modification simply removes a redundant report and reference to the report as a result of the approved Modification 0734S.

### Requested Next Steps

This Modification should be subject to Self-Governance.

Due to the nature of the Modification, it should be considered as Self-Governance as no material change is required, only an update to UNC and removal of a report which will no longer be applicable to current processes.

### 3 Why Change?

In summary, UNC requires an update to remove a report within UNC TPD Section V which will be redundant following the implementation of Modification 0734S. Should the change not be made, following the implementation of Modification 0734S, UNC TPD Section V would reference a legacy theft of gas process and report which is redundant.

Following the approval of UNC Modification 0734S in February 2022, it has been identified that the report; "Shipper TOG Report" referenced in UNC TPD V Clause 14.1.1 and detailed in Annex V-5, will become redundant. A new PARR report will be created to go to the PAC, to report on the updated Shipper theft of gas process (as per Modification 0734S), and this will replace the current "Shipper TOG Report".

Under BR1 of Modification 0734S, it states: "For the avoidance of doubt, on implementation of the solution described by this Modification Shippers will no longer be required to manually enter Supplier confirmed Thefts directly into central systems as this process will now be replaced by an automated process initiated by claims submitted by the Supplier via the REC." The existing "Shipper TOG Report" referenced in UNC TPD V Clause 14.1.1 relates to the current Theft of Gas process where Shippers submit theft into central systems and with this now being superseded by the new Modification 0734S, this report cannot be utilised as Shippers will no longer be submitting theft in order to report on it.

This Modification is required to update UNC TPD Section V, Clause 14 of the UNC to remove current Clause 14.1.1 and the 'Shipper TOG Report Data' in Annex-V5 as this relates only to the current theft of gas process and will not be applicable once Modification 0734S is implemented (date to be confirmed).

### 4 Code Specific Matters

#### Reference Documents

[Transportation Principal Document Section V - General](#)

#### Knowledge/Skills

No specific knowledge or skills are required to assess this Modification.

### 5 Solution

A Clause and Annex within UNC Section V should be removed as a result of this Modification.

This is current Clause 14.1.1 in TPD Section V and Annex V-5.

This Clause and Annex should be removed in line with the implementation of Modification 0734S.

### 6 Impacts & Other Considerations

#### Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

None.

### Consumer Impacts

None, as this is a Code amendment change only.

### What is the current consumer experience and what would the new consumer experience be?

The Consumer experience will not be changed as this is a housekeeping Modification and is simply making a minor amendment to the UNC to remove reference to a legacy Shipper theft report once the new process under Modification 0734S is implemented.

Impact of the change on Consumer Benefit Areas:	
Area	Identified impact
Improved safety and reliability n/a	None
Lower bills than would otherwise be the case n/a	None
Reduced environmental damage n/a	None
Improved quality of service n/a	None
Benefits for society as a whole n/a	None

### Cross-Code Impacts

None. The “Shipper TOG Report” is not referenced in IGT UNC and therefore no change is required to IGT UNC as a result of this.

### EU Code Impacts

None.

### Central Systems Impacts

Upon implementation of this Modification, the CDSP will no longer produce the “Shipper TOG Report” on behalf of the DNOs as referenced in UNC TPD V 14.1.1.

## 7 Relevant Objectives

Impact of the Modification on the Transporters’ Relevant Objectives:	
Relevant Objective	Identified impact

a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Positive
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	Positive
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

This Modification seeks to ensure that the legacy report for the Shipper theft of gas process is removed to be replaced by the process introduced under Modification 0734S. The justification of the original Modification applies. Modification 0734S was justified in the following way:

*The proposal is positive in relation to Relevant Objective d) Securing of effective competition as it provides a mechanism by which energy relating to valid thefts is more accurately allocated between Shippers.*

This Modification is also positive in relation to Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code as it looks to remove a legacy report which will be redundant following the implementation of Modification 0734S remaining in UNC.

## 8 Implementation

Implementation must align with Modification 0734S (effective implementation date TBC) to ensure the legacy theft reporting; "Shipper TOG Report" is removed when the new theft process is in place and the legacy report is redundant.

## 9 Legal Text

### Text Commentary

Text commentary has been provided by SGN and is published alongside the Modification.

Legal Text has been provided and is published alongside the Final Modification Report at:  
<https://www.gasgovernance.co.uk/0810>

Post Panel Meeting note from Code Administrator and UNC Modification Panel Secretary

24 June 2022: SGN as Legal Text Provider and the Proposer have both clarified by email that the Modification effective implementation date should be made to align with Modification 0734S, in order to ensure that the two pieces of Legal Text can work together to deliver the intent of the two Modifications, should Modification 0810S be implemented.

## 10 Consultation

Panel invited representations from interested parties on 24 June 2022. All representations are encompassed within the Appended Representations section.

The following table provides a high-level summary of the representations

Implementation was unanimously supported in the 2 representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives
Gazprom Energy	Support	d) positive f) positive
Northern Gas Networks	Support	f) positive

Please note that late submitted representations will not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

## 11 Panel Discussions

### Discussion

The Panel Chair summarised that Modification 0810S would remove Clause 14.1.1 and Annex V-5 'Shipper TOG Report' currently within TPD Section V of the Uniform Network Code (UNC) as intended and in alignment with the implementation of UNC Modification 0734S - Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers.

Panel Members considered the representations made noting that implementation was unanimously supported in the 2 representations received.

Panel Members agreed with respondents and the Proposer that this Modification would ensure that redundant reporting is removed from the UNC as intended under Modification 0734S.

Panel Members agreed Implementation must align with Modification 0734S (effective implementation date TBC) to ensure the legacy theft reporting; "Shipper TOG Report" is removed when the new theft process is in place.

Panel Members asked SGN as Legal Text Provider to confirm that the 0810S Legal Text is workable with the Legal Text for 0734S. The SGN representative confirmed this was correct.

### Consideration of the Relevant Objectives

Panel Members considered Relevant Objective *d) Securing of effective competition between Shippers and/or Suppliers*, agreeing that implementation would have a positive impact because it will support the mechanism by which energy relating to valid thefts is more accurately allocated between Shippers as intended under Modification 0734S.

Panel Members considered Relevant Objective *f) Promotion of efficiency in the implementation and administration of the Code*, agreeing that implementation would have a positive impact because it will ensure that the legacy report for the Shipper theft of gas process is removed and replaced by the process introduced under Modification 0734S.

### Determinations

Panel Members voted unanimously to implement Modification 0810S.

## 12 Recommendations

### Panel Determination

Panel Members agreed that Modification 0810S should be implemented.

## 13 Appended Representations

Representation – Gazprom Energy

Representation – Northern Gas Networks

## Representation Draft Modification Report

### Modification 0810S Amendment of Transportation Principal Document Section V 14.1.1 and Annex-V5 to reflect updated Theft of Gas Process

1. **Consultation close out date:** 15<sup>th</sup> July 2022
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:** Gazprom Energy  
5<sup>th</sup> Floor  
8 First Street  
Manchester  
M15 4RP
4. **Representative:** Steve Mulinganie  
Regulation Manager  
[stevemulinganie@gazprom-mt.com](mailto:stevemulinganie@gazprom-mt.com)  
0799 097 2568 / 0751 799 8178
5. **Date of Representation:** 15<sup>th</sup> July 2022
6. **Do you support or oppose Implementation:**  
As the proposer we **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
This housekeeping modification removes a requirement that is redundant following the implementation of Modification 0734S "Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers
8. **Are there any new or additional Issues for the Modification Report:**  
**No**
9. **Self-Governance Statement Do you agree with the status?**  
**Yes**, this is a housekeeping modification
10. **Relevant Objectives:**  
*How would implementation of this modification impact the relevant objectives?*  
This Modification seeks to ensure that the legacy report for the Shipper theft of gas process is removed to be replaced by the process introduced under Modification 0734S. The justification of the original Modification applies.

Modification 0734S was justified in the following way:

The proposal is positive in relation to Relevant Objective d) Securing of effective competition as it provides a mechanism by which energy relating to valid thefts is more accurately allocated between Shippers.

This Modification is also positive in relation to Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code as it looks to remove a legacy report which will be redundant following the implementation of Modification 0734S remaining in UNC.

#### 11. Impacts & Costs:

*What analysis, development and on-going costs would you face if this modification was implemented?*

We **have not** identified any significant costs associated with the implementation of this modification

#### 12. Implementation:

*What lead times would you wish to see prior to this modification being implemented, and why?*

Implementation must align with Modification 0734S (effective implementation date TBC) to ensure the legacy theft reporting; "Shipper TOG Report" is removed when the new theft process is in place and the legacy report is redundant.

#### 13. Legal Text:

*Are you satisfied that the legal text will deliver the intent of the modification?*

We have **no comments** on the Legal Text provided.

#### 14. Is there anything further you wish to be taken into account?

*Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.*

**No**

Joint Office

[Enquiries@gasgovernance.co.uk](mailto:Enquiries@gasgovernance.co.uk)

11 July 2022

Dear Joint Office,

**Re: UNC 0810S Amendment of Transportation Principal Document Section V 14.1.1 and Annex-V5 to reflect updated Theft of Gas Process**

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

**NGN supports this Modification Proposal.**

**Reason for support**

We support this Modification as we believe it removes reporting from the UNC, which will be made redundant by the implementation of Modification 0734S "Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers", therefore furthering Relevant Objective f) *Promotion of efficiency in the implementation and administration of the Code.*

**Implementation:**

As Self-Governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised. We agree with the proposer's comment that this should be aligned to the implementation of Modification 0734S.

**Impacts and Costs:**

We do not see that this modification will have any material impact to NGN to implement the solution.

**Legal Text:**

We believe the legal text provided should deliver the Solution set out in the modification.

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

None identified.

**Smell gas?**

Call the National Gas Emergency  
Service on 0800 111 999

**a** 1100 Century Way  
Thorpe Park Business Park  
Colton, Leeds LS15 8TU

**t** 0113 397 5300  
**w** [northerngasnetworks.co.uk](http://northerngasnetworks.co.uk)

**we are  
the network**

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)  
Market Services Manager  
Mobile: 07580 215 743

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Call the National Gas Emergency  
Service on 0800 111 999

**a** 1100 Century Way  
Thorpe Park Business Park  
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**w** [northerngasnetworks.co.uk](http://northerngasnetworks.co.uk)

**we are  
the network**