

Representation - Draft Modification Report UNC 0842

Gas Entry onto the Total system via an Independent Gas Transporter

Responses invited by: **5pm on 26 January 2024**

To: enquiries@gasgovernance.co.uk

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

Representative:	Graeme Hunter, Director
Organisation:	Barrow Shipping Ltd
Date of Representation:	Friday 26 th January 2024
Support or oppose implementation?	Support
Relevant Objective:	a) Positive b) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

Biomethane is being injected across the GB gas grid with over 100 sites connected to Gas Distribution (DN) networks. There is potential for more biomethane (and other green gases) to be developed, but producers only have the one option of connecting to a DN. In some cases, developers have identified that delivering gas to an IGT network would be more economic than delivery to a DN. This may be, for example, because there is no suitable DNO network nearby, or because an IGT may offer a more economic and efficient solution.

Implementation: What lead-time do you wish to see prior to implementation and why?

A number of projects require this modification so implementation should be as soon as possible.

Impacts and Costs: What analysis, development and ongoing costs would you face?

Barrow Shipping has extensive experience in gas entry to DN systems and has processes already set up. Barrow has fully participated in the modification process, with a representative working alongside and with the proposer, SGN. Barrow understands that UNC mod 0842 would replicate the existing DN arrangements, so does not anticipate incurring any additional development or ongoing costs. Further analysis is not required.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No

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

While there is nothing in the UNC that precludes gas entry into a DN via an IGT network, it is in all parties' interest to ensure that appropriate arrangements are in place to ensure all safety (i.e. gas composition and measurement) and commercial (i.e. use of system) requirements are met.

Clarifying issues around this transfer of gas in both the UNC and IGT UNC will deliver the necessary consistency and clarity.

To address UNC related issues, SGN has raised this UNC modification proposal. Barrow Shipping strongly supports this, and has raised IGT UNC 'marry' modification 172 to introduce the necessary IGT UNC provisions to dovetail with those proposed in this UNC modification.