#### **UNC Modification**

#### At what stage is this document in the process?

01

# **UNC OXXXFT:**

## 02 Workgroup Report

Modification

**Draft Modification** Report

Final Modification 04

## **Enablement of Exit Assignment** process at Interconnectors

#### **Purpose of Modification:**

UNC Modification 0755S was approved for implementation on 15 July 2021. That modification allowed for the application of the Assignment process to Unbundled Capacity at Interconnectors and is due to be implemented in Spring 2022. This modification amends the European Interconnection Document to remove the barrier between UNC and CAM NC compliance allowing full implementation of UNC 0755S and makes a minor change to clarify the Legal Text.

#### **Next Steps:**

The Proposer recommends that this Modification should be:

subject to Fast Track Self-Governance

This Modification will be presented by the Proposer to the Panel on 20 January 2022. The Panel will consider the Proposer's recommendation and determine the appropriate route.

#### **Impacted Parties:**

High: N/A Low: N/A

None: All Users

#### Impacted Codes:

Uniform Network Code (UNC)

European Interconnection Document (EID)

#### Contents **Any** questions? 1 **Summary** 3 Contact: Joint Office of Gas 2 Governance 3 **Transporters** 3 Why Change? 3 **Code Specific Matters** 3 4 enquiries@gasgove rnance.co.uk 5 **Solution** 4 **Impacts & Other Considerations** 4 0121 288 2107 7 **Relevant Objectives** 5 Proposer: **Daniel Hisgett** 5 **Implementation** 8 **National Grid Legal Text** 9 6 10 Recommendations 6 daniel.hisgett@nati onalgrid.com Timetable 07971500855 Modification timetable: Transporter: **National Grid Pre-Modification Discussed** 06 January 2022 New Modification to be considered by Panel 20 January 2022 Modification Panel decision 20 January 2022 box.gsoconsultatio ns@natinoalgrid.co telephone Systems Provider: Xoserve UKLink@xoserve.c <u>om</u>

### 1 Summary

#### What

Capacity Allocation Mechanisms NC (CAM NC), Article 19 Paragraph 6, allows for unbundled capacity at interconnectors to be traded on secondary markets. UNC0755S was implemented with the intent to enable unbundled capacity to be assigned at Exit Points. In between these two codes, the European Interconnection Document (EID) currently prevents Assignment of Exit Capacity from taking place at Interconnectors. The intent of this modification is to remove that barrier.

This Modification also proposes to make a minor change to the Legal Text to clarify.

#### Why

We believe that this change brings the UNC more closely in line with CAM NC and therefore improves compliance and enables a modification which has already been approved for implementation.

#### How

This can be achieved a change to clause 1.8.1 (e) in the EID and by the removal of the text "(which shall, for the avoidance of doubt be at the published Exit Transmission Services rate applicable for each Day during the Assignment Period)" from TDP Section B Paragraph 6.3.3 (c).

#### 2 Governance

#### Justification for Fast Track Self-Governance.

These changes to the UNC & EID fully enable a modification which has already been approved for implementation. No changes to the intent of the UNC are required and no additional impacts have been identified.

We believe this resolves an inconsistency between the UNC, CAM NC and the EID.

#### **Requested Next Steps**

This Modification should:

• be subject to Fast Track Self-Governance.

## 3 Why Change?

We believe this change is required to enable full implementation of UNC0755S and also brings us more closely in line with CAM NC.

UNC0755 can still be implemented without this modification, but the functionality will not be made available at Interconnectors until the EID is amended to allow Assignment at Interconnectors.

Page 3 of 7

## 4 Code Specific Matters

#### **Reference Documents**

Modification

Transportation Principle Document: Section B

## Joint Office of Gas Transporters

https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2020-10/4%20TPD%20Section%20B%20-%20System%20Use%20%26%20Capacity\_0.pdf

UNC Modification Proposal 0755S https://www.gasgovernance.co.uk/0755

EU Capacity Allocation Mechanism Code

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32017R0459

**European Interconnection Document** 

https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2021-03/4%20EID%20Section%20B%20-%20Capacity.pdf

#### 5 Solution

This modification aligns the updated UNC to the CAM NC by removing the barrier placed in the EID. The amendment to clause 1.8.1 (e) in the EID, along with a small change to the UNC to provide additional clarity to the text, do not change the solution implemented as part of UNC0755S.

The Legal Text is the solution in this instance.

## 6 Impacts & Other Considerations

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

No, it does not.

#### **Consumer Impacts**

There are no impacts beyond those already assessed and approved under UNC0755S.

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

This modification has no impact on consumers save for enabling UNC0755S.

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

## Joint Office of Gas Transporters

#### **Cross-Code Impacts**

None.

#### **EU Code Impacts**

This modification will bring the GB market more closely in-line with the CAM NC.

#### **Central Systems Impacts**

None.

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

The modification allows unbundled capacity to be assigned, as allowed by Article 19 paragraph 6 of CAM NC. While UNC 0755S updated Section B of the UNC, clause 1.8.1 (e) in the EID prevents assignment of Exit Capacity at Interconnectors. This modification brings the GB Market more closely into alignment with the EU.

### 8 Implementation

As Fast Track Self-Governance procedures are proposed, implementation could be sixteen business days after a unanimous vote in favour of implementation by the Modification Panel, subject to no Objection being raised. We feel it would be prudent to align the date with the implementation date of UNC0775S.

### 9 Legal Text

#### **Text Commentary**

The proposal would amend clause 1.8.1 (e) from Section B of the EID and adjust clauses 6.3.3 (c) of the UNC.

#### **Text**

European Interconnector Document (EID)

- 1.8 Provisions of Transportation Principal Document which do not apply
  - 1.8.1 The following provisions of the Transportation Principal Document do not apply in relation to Interconnection Point Capacity:
    - (a) provisions as to the basis on which Users are invited to apply for, may apply for, and are allocated, NTS Entry Capacity or NTS Exit (Flat) Capacity;
    - (b) provisions as to the basis on which Users are invited to offer and may offer for surrender NTS Entry Capacity for a calendar month, and on which such offers are accepted;
    - (c) provisions as to the publication of information relating to invitations as referred to in paragraphs (a) and (b);
    - (d) provisions relating to Code Contingencies affecting the communications for the purposes of the matters referred to in paragraphs (a) and (b);
    - (e) provisions as to the assignment (by System Capacity Assignment) of Registered
       NTS Exit (Flat) Capacity to the extent that those provisions apply to Bundled Firm Interconnection Point Capacity;
    - (f) provisions defining terms which are used only in provisions within paragraphs (a), (b), (c), (d) and (e).

Uniform Network Code (UNC)

- 6.3.3 With effect from the first Day of the Assignment Period (and in respect of each subsequent Day in that Assignment Period):
  - (a) the Assignor User shall cease to be liable for Capacity Charges in respect of the Assigned System Capacity;
  - (b) the Assignee User shall be liable for Capacity Charges in respect of the Assigned System

## Joint Office of Gas Transporters

Capacity;

(c) the Capacity Charges payable by the Assignee User shall be the same Capacity Charges that would have otherwise been payable by the Assignor User for the Assigned System Capacity but for the assignment (which shall, for the avoidance of doubt be at the published Exit Transmission Services rate applicable for each Day during the Assignment Period)

## 10 Recommendations

#### **Proposer's Recommendation to Panel**

Panel is asked to:

• Agree that this Fast-Track Self-Governance Modification Proposal should be implemented.