







UNC Final Modification Report	At what stage is this document in the process?
<h1 style="color: #008000;">UNC 0834S:</h1> <h2 style="color: #008000;">Inclusion of the “Process for the Update and Retention of Shared Site Drawings” as a Subsidiary Document within the Offtake Arrangements Document</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #008000; border-radius: 5px; padding: 5px; display: flex; align-items: center;"> 01 Modification </div> <div style="border: 1px solid #008000; border-radius: 5px; padding: 5px; display: flex; align-items: center;"> 02 Workgroup Report </div> <div style="border: 1px solid #800080; border-radius: 5px; padding: 5px; display: flex; align-items: center;"> 03 Draft Modification Report </div> <div style="border: 1px solid #FF8C00; border-radius: 5px; padding: 5px; display: flex; align-items: center;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>This Modification would add the “Process for the Update and Retention of Shared Site Drawings” to the list of Offtake Subsidiary Documents set out in Section N of the Offtake Arrangements Document. This will allow for uniformity of approach to the management of shared drawings and provide an appropriate governance framework around any future changes.</p>	
<p>Next Steps:</p> <p>Panel consideration is due on 18 May 2023 <i>(at short notice by prior agreement)</i></p>	
<p>Impacted Parties:</p> <p>High:</p> <p>Low: National Gas Transmission and all GDNs</p> <p>None: Shipper Users</p>	
<p>Impacted Codes:</p> <p>N/A</p>	

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Timetable			
Modification timetable:			
Pre-Modification Discussed (Offtake Arrangements Workgroup)	16 January 2023		
Date Modification Raised	06 January 2023		
New Modification to be considered by Panel	19 January 2023		
First Workgroup Meeting (Offtake Arrangements Workgroup)	09 February 2023		
Workgroup Report to be presented to Panel	20 April 2023		
Draft Modification Report issued for consultation	21 April 2023		
Consultation Close-out for representations	10 May 2023		
Final Modification Report available for Panel	11 May 2023		
Modification Panel decision (<i>at short notice by prior agreement</i>)	18 May 2023		

1 Summary

What

The Offtake Arrangements Document (OAD) in the UNC sets out rights and obligations between the Transporters in relation to the connections between, and the planning, maintenance, and operation of, their respective Systems, and the implementation of certain provisions of the Transportation Principal Document (TPD). Section N1.2 of the OAD list a number of Offtake Subsidiary Documents and prescribes the mechanism by which those documents are modified.

Shared site drawings, which pictorially show the physical layout of Shared Site Facilities at Shared Sites, are currently managed by individual Transporters (outside of any prescribed UNC change governance) and have no formal change governance in place.

For the purpose of this Modification, any reference to “Shared Sites” and “Shared Site Facilities” refers to those sites and facilities which falls under the remit of the definitions as outlined in OAD Section N10.1.1.

Why

Following detailed consideration of all potential enhancements to the OAD under UNC Request Workgroup 0646R - Review of the Offtake Arrangements Document, it was identified that there was an opportunity to bring standardisation to the management of shared site drawings across all Transporters providing greater clarity and efficiency to the process.

This Modification seeks to establish consistent change governance arrangements for shared site drawings across all Operators. The proposed solution is to establish a new Subsidiary Document to the OAD which brings uniformity to the governance arrangements by which drawings are updated and shared for a range of different scenarios as well as documenting formally the standards of individual Operators that need to be complied with for instances where another party is making a change to one of their drawings.

How

It is proposed that a new Subsidiary Document “Process for the Update and Retention of Shared Site Drawings” is added to the list of Subsidiary Documents set out in OAD Section N1.2. The new Subsidiary Document (published alongside this proposal) was designed in collaboration with all Operators across a series of workshops.

Prospectively, the prevailing version of the new Subsidiary Document will be published on the Joint Office Website in the following location:

[Offtake Arrangements Document | Joint Office of Gas Transporters \(gasgovernance.co.uk\)](https://www.gasgovernance.co.uk/offtake-arrangements-document)

A supporting amendment will be made to OAD section B 1.6.1.b (iii) and OAD Section N1.2.1 (h).

2 Governance

Justification for Self-Governance

This Modification should be subject to Self-Governance procedures on the basis that the necessary changes would have no material impact on the commercial activities of Shipper Users, Gas Transporters or Gas Consumers. The overarching objective of the Modification is to improve process efficiency for transporters only.

Requested Next Steps

This Modification should be considered a non-material change and subject to Self-Governance.

3 Why Change?

The Offtake Arrangements Document (OAD) in the UNC sets out rights and obligations between the Transporters in relation to the connections between, and the planning, maintenance and operation of, their respective Systems, and the implementation of certain provisions of the Transportation Principal Document (TPD). Section N1.2 of the OAD list a number of Offtake Subsidiary Documents and prescribes the mechanism by which those documents are modified.

Shared site drawings, which pictorially show the physical layout of Shared Site Facilities at Shared Sites, are currently managed by individual Transporters (outside of any prescribed UNC change governance) and have no formal change governance in place.

For the purpose of this Modification, any reference to “Shared Sites” and “Shared Site Facilities” refers to those sites and facilities which falls under the remit of the definitions as outlined in OAD Section N10.1.1.

A review of the Offtake Arrangements Document was conducted under UNC Request Workgroup 0646R which identified an opportunity to enhance the operations of all transporters through bringing consistency to the management of shared site drawings across the industry¹.

Implementation of the proposed solution will result in numerous benefits including, but not limited to:

- Simplification and standardisation of the governance around such drawings for Site Owners who are accountable for the accuracy of the drawings under OAD Section B 1.6 (a);
- Ensuring consistency of drawings and data across impacted Operators;
- Ensuring there is a “Single Source of Truth” drawing;
- Enhanced process efficiency which will speed up project closures by accelerating the time to update shared site drawings; and
- Accelerating the time it takes to update contracts which are dependent on drawings.

Content of the Process for the Update and Retention of Shared Site Drawings

The new Subsidiary Document is the formalisation of certain key principles to ensure consistency in how shared site drawings are managed.

These principles are detailed extensively in the proposed subsidiary document but on high level covers off:

- An agreed scope as to what constitutes a minimum set of standard site owner drawings.
- Implementing the concept that the site owner has sole possession of editable versions of the drawings with site users having corresponding PDF versions.
- A process for Site Users to update Site Owner drawings
- A process for Site Owner to update Site Owner drawings and notifying Site Users.

¹ See UNC Request Workgroup Report 0646R: page 10 “Further Modifications”

- Makes allowances for cost recovery if the site user requests a change is made to a drawing on their behalf by the site owner.

This solution is delivered as a consequence of multiple workshops which included participation from Subject Matter Experts from across all Operators where a consensus of opinion was met.

4 Code Specific Matters

Reference Documents

Offtake Arrangement Document (found here: <https://www.gasgovernance.co.uk/OAD>)

UNC Request [Workgroup Report 0646R](#)

Knowledge/Skills

A knowledge of individual Operator's drawings management processes.

5 Solution

It is proposed that a new Subsidiary Document "Process for the Update and Retention of Shared Site Drawings" is added to the list of Subsidiary Documents set out in OAD Section N1.2.

The new Subsidiary Document (published alongside this Proposal) was designed in collaboration with all Operators across a series of workshops.

Prospectively, the prevailing version of the new Subsidiary Document will be published on the Joint Office Website here: www.gasgovernance.co.uk/OADDocs.

It is proposed that a supporting amendment will be made to OAD section B 1.6.1.b (iii) and OAD section N 1.2.1 (h).

6 Impacts & Other Considerations

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

There is no impact on any Significant Code Review.

Consumer Impacts

There is no impact on consumers on the basis that the Modification is solely associated with Transporter to Transporter issues.

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

As this Modification proposal seeks to address Transporter to Transporter matters, the end consumer experience should not be impacted.

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

No other industry codes are impacted.

EU Code Impacts

There is no impact on EU code.

Central Systems Impacts

There is no impact on any central system.

Rough Order of Magnitude (ROM) Assessment

n/a

Performance Assurance Considerations

The Workgroup Participants agreed that there is no impact on PAC.

Initial Representations

None Received.

Panel Questions

Is there a consequential impact on Shippers?

Workgroup Participants agreed that as this is a transporter-to-transporter arrangement only there would be no consequential impact on shippers.

Workgroup Impact Assessment

Workgroup Participants agreed with the statements made by the Proposer.

The question of accountability for Hazardous Area Drawings was discussed by the Workgroup and Participants agreed that such accountability is set out in relevant legislation and in any event falls outside the scope of this Proposal which seeks only to better define the processes by which drawings are managed. Workgroup Participants did not identify any other concerns.

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.	Positive
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.	Positive
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.	None
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.	None
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

The Modification furthers Relevant Objectives (a) and (b), as follows:

a) Efficient and economic operation of the pipe-line system

The proposed changes in this Modification are expected to introduce a robust and consistent approach to the management of change to Shared Site Drawings. Adoption of clear rules or how such changes are governed will enable Transporters to operate their Networks efficiently as change proposals will be more transparent and progress in accordance with a more defined timescale.

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

Due to the shared ownership nature of the sites concerned, a more defined governance process will enable Transporters to better co-ordinate any changes made at shared sites and therefore enhance the efficiency of operating the relevant assets.

All Workgroup Participants agreed with the above statements by the Proposer and reaffirmed that this modification satisfies a recommendation of an earlier review group 0646R.

8 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.

In respect of the collaborative processes outlined in the document, as these were conceived by the respective Drawing Management Offices for each Operator, they have begun working to those principles already under pilot arrangements so there should be no difficulty with full adoption.

9 Legal Text

Text Commentary

Section B1.6.1(iii) in the Offtake Arrangements Document (OAD) has been amended to ensure the Site Owner at the Offtake prepares whole site diagrams (required for compliance with Legal Requirements, including Hazardous Area diagrams and COMAH diagrams) in accordance with the Process For The Update And Retention of Shared Site Drawings

A new subparagraph (h) has been inserted under OAD Section N1.2.1 to clearly identify the “Process For The Update And Retention of Shared Site Drawings” as an Offtake Subsidiary Document.

Text

OFFTAKE ARRANGEMENTS DOCUMENT

SECTION B – CONNECTION FACILITIES

Amend paragraph 1.6 to read as follows:

1.6 Party's responsibilities

1.6.1 For the avoidance of doubt, at each Offtake Site, subject to the provisions of this Section B:

- (a) each Party shall be responsible for its own Connection Facilities, including the operation and maintenance of such Connection Facilities, compliance with any Legal Requirement in relation to such Connection Facilities, and the preparation of all such plans, diagrams, reports, and other documents as may be required by any Legal Requirement in relation to such Connection Facilities;
- (b) subject to paragraph (a), each Party shall be responsible for the whole or any part of the Offtake Site for which it is Site Owner, including:
 - (i) the maintenance of land and buildings;
 - (ii) compliance with any Legal Requirement in relation to such land and buildings; and
 - (iii) in particular, the preparation of any whole site diagrams required for compliance with any such Legal Requirement, including Hazardous Area diagrams and COMAH diagrams, and in accordance with the Process for the Update and Retention of Shared Site Drawings document.
- (c) each Party shall be responsible for performing its obligations in accordance with the Process for the Update and Retention of Shared Site Drawings.

SECTION N – GENERAL

Amend paragraph 1.2 to read as follows:

1.2 Subsidiary Documents

1.2.1 In this Document, "**Offtake Subsidiary Document**" means each of the following documents:

- (a) the SCO Interface Procedures (referred to in Section C3);
- (b) the Offtake Communications Document (referred to in Section M);
- (c) the Validation Procedures (referred to in Section D3);
- (d) the Emergency Procedures E2 (referred to in Section C2.3);
- (e) the document TD76 (referred to in Section H1.3.1);
- (f) the Transmission System Operator to Distribution System Operator Agreement Guidelines (referred to in Section N9);
- (g) the OAD Template Agreements Document (referred to in Section A3.1.1 and paragraph 3.1.2);
- (h) the Process for the Update and Retention of Shared Site Drawings (referred to in Section B1.6.1);
- (i) any other document which may be specified or may be agreed by the Parties to be an Offtake Subsidiary Document.

Workgroup Assessment

Workgroup Participants reviewed the text and agreed that it meets the intent of the Solution.

10 Consultation

Representations were invited from interested parties on 21 April 2023. All representations are encompassed within the Appended Representations section, including any initial representations.

The following table provides a high-level summary of the representations. Of the 3 representations received, two supported implementation, and one offered qualified support.

Implementation was unanimously supported in the three representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives
Cadent Gas	Qualified Support	a) positive b) positive
National Gas Transmission	Support	a) positive b) positive
Wales & West Utilities	Support	a) positive b) positive

Please note that late submitted representations may 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

12 Recommendations

13 Appended Representations

Representation – Cadent Gas

Representation – National Gas Transmission

Representation – Wales & West Utilities

Representation - Draft Modification Report UNC 0834S

Inclusion of the “Process for the Update and Retention of Shared Site Drawings” as a Subsidiary Document within the Offtake Arrangements Document

Responses invited by: 5pm on 10 May 2023

To: enquiries@gasgovernance.co.uk

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

Representative:	Shiv Singh
Organisation:	Cadent
Date of Representation:	05.05.23
Support or oppose implementation?	Qualified 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)

Cadent accepts that it is the site Owner that holds and is responsible for the site drawings, including the Hazardous Area(HAZ) drawing. The separation of Site User responsibilities under OAD Section B 1.6.1(a) and Site Owner under B 1.6.1(b) is helpful in clarifying these responsibilities, as is the provision that 1.6.1(b) is ‘subject to’ 1.6.1(a).

For the avoidance of doubt, it may help to further clarify that it is the Site User that is responsible for HAZ drawings pertaining to Site User Connection Facilities contained within the whole site documentation. Two potential options for achieving this are:

1. Amend B 1.6.1(b)(iii) to read as follows: “in particular, the preparation of any whole site diagrams required for compliance with any such Legal Requirement, including Hazardous Area diagrams and COMAH diagrams (but specifically excluding any Hazardous Area diagrams prepared by the Site User in relation to the Site User’s Facilities under paragraph 1.6.1(a) above), and in accordance with the Process for the Update and Retention of Shared Site Drawings, and”, or
2. Amend the related Subsidiary document to clearly state HAZ drawing responsibilities for the respective zones.

Given Cadent has raised this concern and discussed it at length at workgroup, we are disappointed that National Gas has chosen not to address this at this time. But for this concern, Cadent would be supportive of this proposal.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree that self-governance applies as there is no material impact on any concerned party.

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

Implementation can take place as soon as is recommended.

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

None.

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

Yes, but see our comments above.

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.*

n/a

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

None.

Representation - Draft Modification Report UNC 0834S

Inclusion of the “Process for the Update and Retention of Shared Site Drawings” as a Subsidiary Document within the Offtake Arrangements Document

Responses invited by: **5pm on 10 May 2023**

To: enquiries@gasgovernance.co.uk

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

Representative:	Stephen Ruane
Organisation:	National Gas Transmission
Date of Representation:	10 May 2023
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)

As the proposer, National Gas Transmission (“NGT”) supports the implementation of this Modification Proposal.

This Proposal addresses a deficiency in the current arrangements regarding the management of changes to Shared Site Drawings. The current absence of change governance would be addressed by the implementation of this Proposal which would introduce a new Offtake Subsidiary Document that establishes a process for making such revisions.

On this basis we continue to believe that adoption of clear rules or how such changes are governed will enable Transporters to operate their Networks efficiently as change proposals will be more transparent and progress in accordance with a more defined timescale (thereby better facilitating relevant objective (a)).

Further, due to the shared ownership nature of the sites concerned a more defined governance process will enable Transporters to better co-ordinate any changes made at shared sites and therefore enhance the efficiency of operating the relevant assets (thereby better facilitating relevant objective (b)).

Self-Governance Statement:

NGT continues to believe that the proposed change would have no material impact on the commercial activities of Shipper Users, Gas Transporters or Gas Consumers, therefore the application of Self-Governance procedures is entirely appropriate.

Implementation:

Although no lead time is required for implementation from an NGT perspective, we understand that as Self-Governance procedures are applicable, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

It is worthy of note that in respect of the collaborative processes outlined in the Offtake Subsidiary Document, as these were conceived by the respective Drawing Management Office's for each Transporter, they have begun working to those principles already.

Impacts and Costs:

NGT will not incur any material costs in the event of the implementation of this Proposal

Legal Text:

NGT is satisfied that the legal text delivers the intent of the solution identified in this Proposal.

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

NGT has not identified any such errors or omissions.

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

We note that in its representation dated 5 May 2023 (published 9 May 2023) Cadent Gas has offered support but qualified this on the basis of a preference for the Proposal to have included clarification of responsibilities for the preparation of Hazardous Area diagrams.

Whilst Cadent has qualified its support on this basis, this was discussed extensively within Workgroup (and indeed in bi-lateral discussions with Cadent) where we consistently set out our belief that seeking to include such clarification was out of scope of this Proposal, the remit of which was deliberately limited to implementation of the following recommendation as set out in the [Request Workgroup Report for Request Group 0646R](#):

Further Modifications

Further Modification(s) are expected to be progressed by OAD parties following the closure of Workgroup 0646R for the following areas:

- *Proposed Modification for the management of site drawings. This Modification is to propose an OAD reference to a new OAD subsidiary document for the management of site drawings between Transporters. This aims to improve consistency and provide process clarity. The process was developed by an offline process expert workgroup.*

Given this, our view is there was no remit for Modification 0834S to incorporate additional elements outside this specific recommendation of the Request Group 0646R conclusions and that if necessary, separate discussions on the topic of Hazardous Area diagrams were held.

Further to a bi-lateral meeting between NGT and Cadent held ahead of the final Workgroup Meeting on 27 March 2023, both parties concluded that as a consequence of the limited scope of Modification Proposal 0834S, the optimal approach for the Hazardous Area diagrams issue was for it to be raised as a topic for discussion in the Offtake Arrangements Workgroup. This conclusion is reflected in the [minutes from the subsequent final Workgroup Meeting on 23 March 2023](#) (attended by Simon Howard from Cadent Gas), the relevant extract is as follows:

4.0 Amended Modification

Stephen Ruane [NGT] noted that hazardous areas is a complicated process and will require a review at some point. Darren Dunkley [Cadent Gas] has advised the process may need a slight tweak to accountabilities which would require a broader scope than the intention for this Modification 0834S. It was also noted that Darren Dunkley plans to raise this as a topic at the Offtake Arrangements Workgroup and that he is happy to proceed with Modification 0834S without the wider scope of accountabilities for hazardous areas.

At the conclusion of Workgroup assessment for this Proposal, the participants agreed that accountability for Hazardous Area Drawings was out of scope of this Proposal, this is recorded in the following section of the [Workgroup Report](#):

Workgroup Impact Assessment

Workgroup Participants agreed with the statements made by the Proposer.

The question of accountability for Hazardous Area Drawings was discussed by the Workgroup and Participants agreed that such accountability is set out in relevant legislation and in any event falls outside the scope of this Proposal which seeks only to better define the processes by which drawings are managed. Workgroup Participants did not identify any other concerns.

Notwithstanding the 'qualification' matter it has raised, we note that Cadent has nonetheless concluded that implementation of this Proposal would better facilitate Relevant Objectives (a) and (b) and that matters relating to its qualification aside, the legal text prepared by NGT delivers the intent of the solution.

Representation - Draft Modification Report UNC 0834S

Inclusion of the “Process for the Update and Retention of Shared Site Drawings” as a Subsidiary Document within the Offtake Arrangements Document

Responses invited by: **5pm on 10 May 2023**

To: enquiries@gasgovernance.co.uk

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

Representative:	Leteria Beccano
Organisation:	Wales & West Utilities
Date of Representation:	10 th May 2023
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)

WWU supports this modification. This Modification follows on from Modifications 0683 and 0792. The Process for the Update and Retention of Shared Site Drawings have been discussed in detail and agreed by all the GDNs. By adding the Site Drawings process to the list of Offtake Subsidiary Documents will provide the Gas Transporters and National Gas with a uniformed approach for updating the diagrams and there will no longer be several different methods for carrying out the same process.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree that this modification satisfies the self-governance criteria.

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

None.

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

WWU will not face any ongoing costs. The only costs that a GDN may face is due to cost recovery if it is agreed that one party will update a diagram on behalf of the other party.

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

None