

To: UNC Shippers, GDNs, NTS Entry, Interconnector and Storage Operators

13 March 2023

Gas Quality Changes: Review of the Gas Safety (Management) Regulations 1996 (GS(M)R)

Dear Colleague,

On 10 March 2023, the Health and Safety Executive published its response to its consultation held in 2022 on proposals to amend certain provisions in the GS(M)R. Subject to parliamentary approval, the following changes to the UK gas quality specification will enter into force on 6th April 2023¹:

- Removal of the Incomplete Combustion Factor (ICF) parameter
- Removal of the Soot Index parameter
- Introduction of a new parameter of Relative Density with a limit of 0.7.

Therefore, with effect from 6th April 2023 ('Day 1'), we plan to start monitoring gas quality compliance at all points at which gas enters the NTS based on the Relative Density parameter instead of ICF and Soot Index. The purpose of this letter is to explain our proposed approach to implementation of these changes and how they will take effect from a legal perspective.

Removal of ICF and Soot Index Parameters

For points at which NGT measures the gas quality, it will not be feasible to remove ICF and Soot Index measurements from the measurement systems before Day 1; this will be carried out as and when works are scheduled on these systems in the future. Rather, from Day 1, we propose to disable the operational alarms in respect of these two parameters within our SCADA system which act as the trigger for our operational staff to invoke Transportation Flow Advice (TFA) procedures for out-of-specification gas. This will ensure that we do not take any action to curtail gas flows

¹ HSE has also announced that a reduction to the lower limit for Wobbe Index in GS(M)R from 47.2 MJ/m³ to 46.5 MJ/m³ will apply from 6th April 2025, in respect of which we will be engaging with industry separately and is outside the scope of this letter.

at any location based on these parameters, even though they will, for the time being, continue to be measured.

Introduction of Relative Density Limit

Relative Density is a parameter that is already measured and telemetered in respect of every point at which gas is delivered to the NTS but is not at present (by virtue of the ICF and Soot Index parameters) a parameter against which we monitor compliance. From Day 1, we plan to start monitoring compliance against a 0.7 Relative Density limit and will therefore need to install 'warning' and 'breach' operational alarms for each relevant location within our SCADA systems.

At points where NGT owns the gas quality measurement equipment, the range over which our telemetry operates for Relative Density is typically between 0.5 and 0.7. When the measurement system is due for upgrade, we propose to extend the upper range to 0.8 to allow for more effective operational monitoring. For points at which we monitor gas quality based on a repeat telemetry signal from the upstream operator's gas quality measurement system, we will engage with such operators separately about any future extension to the telemetry range.

NTS Operational Agreements and UNC Requirements

The gas quality specification that applies in respect of NTS entry, storage and interconnection points is comprised within the relevant Network Entry Agreement, Storage Connection Agreement and Interconnection Agreement (the 'Operational Agreements'). At present, the Operational Agreements contain limit values for Soot Index and ICF, which need to be replaced with the new Relative Density limit.

As previously communicated at the Transmission Workgroup², the need for this change derives from a legal requirement, therefore, in accordance with UNC TPD Section I2.4.5, this change will be deemed to be incorporated into the Operational Agreements from Day 1 and then, subsequently, we will seek to agree and execute the necessary contractual amendments with each operator.

In accordance with UNC TPD I2.2.4, shipper consent prior to such amendments being executed is not required. This communication serves as the means through which NGT discharges its obligation to notify all UNC shippers under UNC TPD I2.2.6(b).

If you have any queries in relation to this letter, please contact Philip.hobbins@nationalgrid.com in the first instance.

Yours faithfully

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² [Transmission Workgroup Presentation – March 2022](#)



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