

UNC Workgroup 0842 Minutes Gas Entry onto the Total system via an Independent Gas Transporter

Wednesday 28 June 2023

via Microsoft Teams

Attendees

Bob Fletcher (Chair)	(BF)	Joint Office
Vera Li (Secretary)	(VL)	Joint Office
Andy Clasper	(AC)	Cadent
Ben Oldham	(BO)	Cadent
Charlotte Gilbert	(CG)	BU-UK
Daniel Worman	(DW)	GTC
David Mitchell	(DMi)	SGN
Ellie Rogers	(ER)	CDSP
Jack Shakeshaft	(JS)	GTC
Jenny Rawlinson	(JR)	BU-UK
Joel Martin	(JM)	SGN
Nick King	(NK)	CNG Services
Phil Lucas	(PL)	National Gas Transmission
Shiv Singh	(SS)	Cadent Gas
Steve Mulinganie	(SM)	SEFE Energy
Tom Stuart	(TS)	Wales & West Utilities

This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <https://www.gasgovernance.co.uk/0842/280623>

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 September 2023

1. Introduction and Status Review

Bob Fletcher (BF) welcomed parties to the meeting.

1.1 Approval of Minutes (23 May 2023)

The minutes from the previous meeting were approved.

1.2 Approval of Late Papers

No Late Papers to consider.

1.3 Review of Outstanding Actions

0501: Proposer (DM/JM) to consider adding a flow diagram to illustrate the flow of responsibility for each party and UNC obligations.

Update: Proposer advised that this has not been added and will revert in the next Workgroup meeting.

Workgroup participants agreed to carry forward the action. **Carried Forward**

0502: DM/JM to investigate the Transportation Charge treatment and rules on the IGT LDZ system and incorporate it into the Modification.

Update: DM advised this has been covered in the Amended Modification V2.0 and further discussed under Agenda item 2: Review of Amended Modification. Workgroup participants agreed this Action could now be closed. **Closed**

0503: Proposer (DM/JM) to liaise with IGT regarding the LC4B Statement and Transportation Charges.

Update: DM advised that Nick King (NK) attended the IGT UNC Modification Workstream Meeting on 08 June 2023 for a discussion on the LC4B Statement.

NK noted he has provided an overview of the connection charging elements of Modification 0842 to the IGT Workstream Committee. Details of the discussion could be found in the meeting minutes [here](#).

DMi also noted in the UNC IGT Modification Workstream Meeting that Modification 0842 would likely result in an update for IGT Arrangement Document (IGTAD) rather than a mirror Modification.

Workgroup participants agreed this Action could now be closed. **Closed**

0504: Proposer (DM/JM) to consider Business Rules to cover IGT / DN Commercial arrangements.

Update: Proposer advised this was linked to a potential service that the relevant DNO could provide to an IGT for gas monitoring services. The Proposer expressed concern to include this in the Modification as a Business Rule as this should be the IGT to decide to make the arrangement with the DNO.

NK suggested including information for “Avoidance of Doubt” statement and he agreed IGT should have the bi-lateral agreement with the connection party.

Workgroup participants agreed this Action could now be closed. **Closed**

0505: Chair (RH) to request an extension of one month for the Workgroup Report to Panel to September.

Update: Workgroup Extension request was submitted to the Panel on 15 June 2023 and has been approved. **Closed**

2. Review of Amended Modifications

Joel Martin (JM) and DM provided an overview of the amendment of the Modification following a discussion at the previous Workgroup meeting. All changes had been captured in Version 2.0 of the Modification published at <https://www.gasgovernance.co.uk/0842>. All key points discussed are noted as follows:

1 Summary

How

A Workgroup participant pointed out a minor mistake in the “How” session. JM agreed to amend.

Why Change

The Proposer advised the change was to clarify the LDZ system entry point is an entry point onto the IGT Network hence there is a requirement which is reflected in the Business Rule and there needs to be a Network Entry Agreement (NEA) between the IGT and the Delivery Facility Operators.

The suggestion from Workgroup is to define/capitalisation on the LDZ entry point system.

JM advised the current definition of Entry Point under UNC TPD Section I is restricted and that it will be for the lawyer to modify the Legal Text to permit the LDZ Entry Point also exist for IGT Network and to extend the current definition of the LDZ system entry point.

5 Solution

Business Rules

The Proposer noted the Business Rules have been updated following the discussions from the last Workgroup meeting.

BR1:

NK suggested having a look at this further after seeing the Legal Text that this is workable.

BR 2:

Steve Mulinganie raised an issue on bullet point 3 - "Access to the NEA should be open to the relevant DNO (connected to the IGT System) as well as the relevant Shipper User(s)" queried why Shipper User(s) being mentioned as his understanding is largely between the Transporters and IGT and the wording of Access.

JM explained this is the existing provisions in TPD Section I allows the relevant Shippers to have the right of site agreement and clarified this is not a new BR but just to substantiate the existing terms. DM confirm to crosscheck the relevant rules in TPD Section I if this is currently used and could effectively remove it.

The Workgroup agreed this bullet point be removed as such. However, one Workgroup participant disagreed. The Proposer agreed that it is worth a bullet point to set out the clarity of the existing provisions/obligations in the Code prevailed to the LDZ system entry point for Shippers.

NK suggested reviewing the Legal Text for consistency and providing clarity on Entry points.

BR 3: no further comment.

BR 4:

Tom Stuart (TS) raised a comment on the quality of the flow of gas from IGT onto the DNO Network and requested to see more details around the assurance on the compliance of the quality of gas.

JM mentioned that this is a case of legal issues under GSMR for the IGT and the IGT has to comply the same as a Transporter would need to.

NK confirmed all IGTs have their own safety case with HSE which covers the IGTs' legal obligation compliance for the gas quality.

A workgroup participant suggested having an avoidance of doubt statement to reiterate the requirement. In addition, some of the BRs are not actually BR driving the change of legal text but an issue with the context which could be tidied up.

BR 5: no further comment.

BR 6: Jenny Rawlinson (JR) asked for clarification on the terminology "Total System" if just transmission from DNO Network or if this includes the IGT network too.

NK clarified the Total System does not include IGT networks under TPD Section A 1.1.1 (a) defines "System", and TPD Section A 1.1.1 (b) "Total System" means all the Systems taken together.

The Workgroup discussed whether IGT should be included in the "Total System".

The Proposer noted that this BR is about the energy flow into or via the system entry points included in Gemini effectively and is surprised IGT is not included. It is a matter for the legal text to interpret this rule accordingly. The issue associated with bringing IGT into the definition of the system would be more wide range and beyond this Modification so might need to look

at it. The Proposer also agreed to include the “For Avoidance of Doubt” so as to set out for the clarity on the existing provisions/obligations in the code for users and shippers prevails in this Modification.

A workgroup participant raised the issue at this point that Ellie Rogers (ER) may need to look at whether a Rough Order of Magnitude (ROM) is required for this Modification. The Proposer commented that he did not envisage any Central System changes so should have no impact on Gemini.

ER commented that as from the previous Workgroup Meeting that this is only a case of standard BAU but would have a look in detail if there is a change that a ROM is required.

The Proposer explained the difference between the current way of working and the way that works in this Modification. It is worth adding a BR to clarify IGT’s obligation for the submission of Data to Gemini and/or to have an Agreement with DNOs to provide this service.

BR 7: No updates.

BR 8: No updates.

BR 9:

JM provided more insights into this BR regarding the elements of the Transportation charges:

- NTS Exit Capacity Charge
- GDN Operational Cost
- LDZ System Cost

The Proposer noted it should be up to the IGTs to propose a Transportation charge associated with Entry via the Network and not apply in this Modification. NK confirmed that IGTs have their own system.

New Action 0601: The Proposer (DM/JM) to update/amend the Modification and provide Legal Text for the next Workgroup Meeting (28 July 2023) to finalise Workgroup Report for August Panel (17 August 2023)

New Action 0602: Xoserve (ER) to check ROM requirement and/or to provide CDSP Statement/ROM for the next Workgroup Meeting discussion.

6 Impacts

BF asked Workgroup participants if there are any IGT impacts as there have been some reciprocal changes going through the IGT process.

NK advised there have been meetings and discussions, and following the model of the DN Entry, and a previous Modification which has dedicated the arrangements to a bi-lateral agreement between the IGTs and gas distribution networks. IGT to look at the LC4B Statements.

JR noted there would be questions from IGT seeking further clarifications whether offline or in the IGT UNC Modification Stream Meeting. From the previous meeting, it was noted if a need to change the IGT UNC or commercial agreement outside the IGT UNC.

A workgroup participant asked if a Mirror Modification is required regarding the Central changes IGT UNC.

JM responded it would be for the lawyer to draft the legal text that the reciprocal obligations reflected in the IGTAD and the obligations sit in the UNC, and do not anticipate a mirror Modification is required.

NK agreed to review the Legal Text if changes in IGT UNC are required. There should be no requirement for a Mirror Modification if the IGTAD interaction with UNC is correct then should suffice only if the lawyer specifies the requirement to change. The only requirement for the IGT UNC to change is that IGT wants to put the Transportation Charge in the future date.

The Workgroup agreed to review the Legal Text to consider whether there is a requirement for a Mirror Modification.

3. Development of Workgroup Report

To be discussed in the next Workgroup Meeting.

4. Next Steps

BF confirmed the next steps are:

- Proposer to review the discussions of today’s meeting and submit Amended Modification
- Submission of Legal Text to be reviewed in the next Workgroup Meeting
- Xoserve to prepare CDSP Statement and ROM requirement
- UNC IGT impacts
- BF to draft up comments for the Workgroup Report

5. Any Other Business

None raised.

6. Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
10:00 Friday 28 July 2023	5pm Thursday 20 July 2023	Microsoft Teams	<ul style="list-style-type: none"> • Review Amended Modification • Review Legal Text • Finalise Workgroup Report

Action Table (as of 28 June 2023)

Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0501	23/05/23	2.0	Proposer (DM/JM) to consider adding a flow diagram to illustrate the flow of responsibility for each party and UNC obligations.	July 2023	Proposer (DM/JM)	Carried Forward
0502	23/05/23	2.0	DM/JM to investigate the Transportation Charge treatment and rules on the IGT LDZ system and incorporate it into the Modification.	June 2023	Proposer (DM/JM)	Closed
0503	23/05/23	2.0	Proposer (DM/JM) to liaise with IGT regarding the LC4B Statement and Transportation Charges.	June 2023	Proposer (DM/JM)	Closed
0504	23/05/23	2.0	Proposer (DM/JM) to consider Business Rules to cover IGT / DN Commercial arrangements.	June 2023	Proposer (DM/JM)	Closed

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0505	23/05/23	4.0	Chair (RH) to request an extension of one month for the Workgroup Report to Panel to September.	June 2023	Chair	Closed
0601	28/06/23	2.0	Proposer (DM/JM) to update/amend Modification and provide Legal Text for next Workgroup Meeting (28 July 2023) to finalise Workgroup Report for August Panel (17 August 2023)	June 2023	Proposer (DM/JM)	Pending
0602	28/06/23	2.0	Xoserve (ER) to check ROM requirement and/or to provide CDSP Statement for discussion.	July 2023	Xoserve (ER)	Pending