UNC Modification	At what stage is this document in the process?

UNC 0880:

Amendment to Wobbe Index upper limit in the Network Entry Agreement at the York Entry Point.

01 Modification
02 Workgroup Report
03 Draft Modification Report
04 Final Modification Report

Purpose of Modification: The Modification will enable the Wobbe Index upper limit set out in the York Network Entry Agreement between National Gas and Centrica Energy Storage to be increased from 51.2 MJ/m3 to 51.4 MJ/m3.

Next Steps:

The Proposer recommends that this Modification should be:

- subject to Self-Governance
- assessed by a Workgroup

This Modification will be presented by the Proposer to the Panel on 20 June 2024. The Panel will consider the Proposer's recommendation and determine the appropriate route.

Impacted Parties:

Low: GB Gas transporters, interconnector operators, shippers, consumers.

Impacted Codes:

None.

Contents

Timetable

Modification timetable:

Pre-Modification Discussed	06 June 2024
Date Modification Raised	06 June 2024
Presentation to Panel	20 June 2024
First Workgroup Meeting	04 July 2024
Workgroup Report to be presented to Panel	15 August 2024
Draft Modification Report issued for consultation	16 August 2024
Consultation Close-out for representations	06 September 2024
Final Modification Report available for Panel	10 September 2024
Modification Panel decision	19 September 2024

Any questions?

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1 Summary

What

This Modification will enable an amendment to the Wobbe Index higher limit within the Network Entry Provisions between Centrica Energy Storage Limited (CESL) and National Gas Transmission at Easington. The impacted Network Entry Agreement relates to the York Entry Point located within the Easington Aggregate System Entry Point. It is proposed to increase the Wobbe Index upper limit from 51.2 MJ/m^3 to 51.41 MJ/m^3.

Why

The Easington Aggregate System Entry Point receives gas from a number of supply sources. Since 2022, the Tolmount field has produced gas transported via the Humber Gathering System into the Easington terminal. The gas is combined with the deliveries from Rough storage and Rough production, which in turn is delivered to the NTS via the York and Rough Entry Points. During Q4 2023, gas entering via the York Entry Point was, for a few days, exceeding the Wobbe Index upper limit contained in the Network Agreement, albeit within the permitted Gas Safety Management Regulations (GS(M)R) limit of 51.41 MJ/m^3. Gas entering via the Rough Entry Point was and continues to be subject to a higher Wobbe Index upper limit, as provided for in its Network Entry Agreement.

Due to these occasional deviations in Wobbe levels, it is appropriate to seek an increase in the Wobbe Index upper limit contained with the York Terminal Network Entry Agreement. The change will reflect the limit contained within the Rough Terminal Network Entry Agreement while remaining within the limit set down in the GS(M)R.

How

The Proposer is seeking to amend the Network Entry Provision contained in the York Terminal Network Entry Agreement at Easington from 51.2 MJ/m^3 to 51.41 MJ/m^3.

2 Governance

Justification for Self-Governance

The modification:

(i) is unlikely to have a material effect on:

(a) existing or future gas consumers; and

(b) competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes; and

(c) the operation of one or more pipe-line system(s); and

(d) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and

(e) the uniform network code governance procedures or the network code modification procedures; and

(ii) is unlikely to discriminate between different classes of parties to the uniform network code/relevant gas transporters, gas shippers or DN operators.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup.

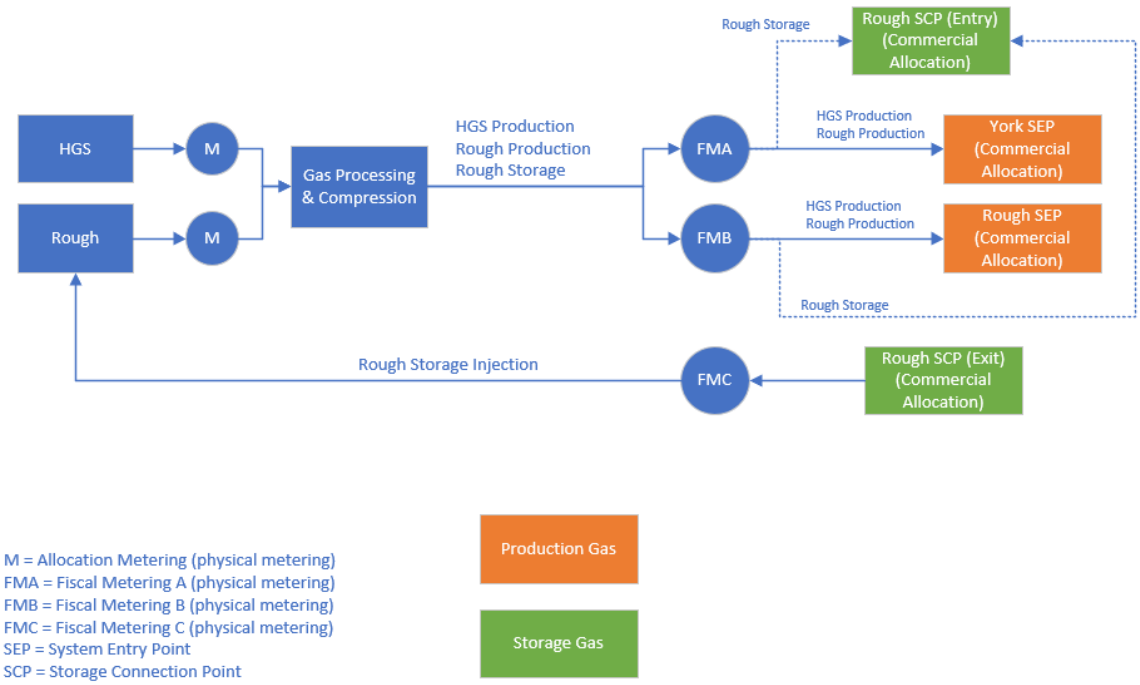
The Modification aligns the Wobbe Index upper limit in the York Terminal Network Entry Agreement with those stated in the Rough Terminal Network Entry Agreement and the Rough Storage Connection Agreement. In addition, it aligns it with the upper limit stated in the GS(M)R. Noting that gas supplied from the Tolmount field has, and may continue to exhibit occasional higher Wobbe values, it would be appropriate to make this change at the earliest opportunity.

3 Why Change?

The Easington Entry Point receives gas from a number of supply sources. Since 2022 the Tolmount field has produced gas, transported via the Humber Gathering System into the Easington terminal. The gas is combined with the deliveries from Rough storage and Rough production, which in turn is delivered to the NTS via the York and Rough Entry Points. During Q4 2023, gas entering via the York Entry Point was, for a few days, exceeding the Wobbe Index upper limit contained in the Network Entry Agreement, albeit within the permitted Gas Safety Management Regulations (GS(M)R) limit of 51.41 MJ/m^3. Gas entering via the Rough Entry Point was and continues to be subject to a higher Wobbe Index upper limit, as provided for in its Network Entry Agreement.

The diagram below provides an overview of the gas flows and metering configuration at Easington pertaining to the York and Rough entry points. It clearly shows the flows from the Humber Gathering System and Rough combining at the gas processing plant located at the terminal. Onward delivery is then split across the York and Rough Entry Points which naturally will exhibit the same gas qualities, noting that the Rough Network Entry Agreement contains a Wobbe Index upper limit of 54.41 MJ/m^3.

If the Wobbe Index upper limit set down in the York Network Entry Agreement is not increased, based on recent flows there is the potential for future flows to breach the permitted levels, which may result in the cessation of flows.



Due to these occasional deviations in Wobbe levels, it is appropriate to seek an increase in the Wobbe Index upper limit contained with the York Terminal Network Entry Agreement. The change will reflect the limit contained within the Rough Terminal Network Entry Agreement while remaining within the limit set down in the GS(M)R.

This Modification ensures that CESL conforms with the requirements set out its Network Entry Agreement by seeking to change a gas quality parameter where it has been identified that it is necessary.

4 Code Specific Matters

Reference Documents

Gas Safety (Management) Regulations (GS(M)R 1996

https://www.legislation.gov.uk/uksi/1996/551/contents/made

Knowledge/Skills

No additional knowledge/skills, above those available, required to assess this Modification.

5 Solution

This Modification seeks to amend the Network Entry Provision between CESL and National Gas at the York terminal at Easington. It is proposed to increase the Wobbe Index upper limit from 51.2 MJ/m^3 to 51.41 MJ/m^3.

6 Impacts & Other Considerations

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

No impact identified.

Consumer Impacts

There will be a benefit to consumers in the event that the Wobbe content of the gas entering at the York Entry Point exceeds the current permitted level but complies with the proposed upper limit. The change will ensure that the gas is permitted to flow which will protect the supply of gas and facilitate GB supply security.

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

The enhancement of security of supply will benefit all consumer groups.

Impact of the change on Consumer Benefit Areas:	
Area	Identified impact
Improved safety and reliability Securing the supplies of gas at the York Entry Point will help in ensuring that the overall system supply and demand balance is maintained on an economic basis as alternative and potentially more expensive sources of supply would not be required were the supplies at the York Entry Point curtailed for non-conformity with the Network Entry Provisions.	Positive
Lower bills than would otherwise be the case As above	Positive
Reduced environmental damage	None
Improved quality of service	None
Benefits for society as a whole	None

Performance Assurance Considerations

There are no PAC considerations.

Cross-Code Impacts

None

EU Code Impacts

None

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.	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.	None

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.	Positive
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 implementation of this proposal would better facilitate the following Relevant Objectives:

a) The efficient and economic operation of the pipeline system is positively impacted by this Modification because it would facilitate additional volumes of gas to be processed through the existing network infrastructure than would otherwise be the case in the event that the supply was constrained due to exceeding the existing Wobbe Index upper limit.

d) The Modification will secure greater flexibility in the transportation of gas allowing more sources to be 'eligible' to enter the NTS; Securing of effective competition between Shippers would be better facilitated by maximising available supplies into the NTS. Greater supply diversity would result in more shippers bringing gas to the UK and making the NBP more competitive.

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 and the Network Entry Agreement updated accordingly.

9 Legal Text

This is an enabling Modification therefore no UNC legal text is required.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Refer this proposal to a Workgroup for assessment.