









UNC Modification	At what stage is this document in the process?
<div>UNC 0882:</div> <div>Transparency of non-standard gas quality parameters at new entry connections to the NTS</div>	<div><div>01Modification</div><div>02Workgroup Report</div><div>03Draft Modification Report</div><div>04Final Modification Report</div></div>
<div>Purpose of Modification:</div> <div>This Modification seeks to enable greater transparency where a new entry connection to the National Transmission System (NTS) requests a “non-standard” gas quality specification, outside of the published NTS specification. This is to be more consistent with the rules for consultation at existing sites, whilst not impacting the connection process timelines adversely.</div>	
<div>Next Steps:</div> <div>The Proposer recommends that this Modification should be:</div> <div><div><div>•subject to Self-Governance</div><div>•assessed by a Workgroup</div></div></div> <div>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.</div>	
<div>Impacted Parties:</div> <div>High: Storage Operators, Directly Connected customers, Interconnectors</div>	
<div>Impacted Codes:</div> <div>None identified.</div>	

Contents		 Any questions?
1	Summary	3
2	Governance	4
3	Why Change?	5
4	Code Specific Matters	5
5	Solution	6
6	Impacts & Other Considerations	6
7	Relevant Objectives	7
8	Implementation	8
9	Legal Text	8
10	Recommendations	8
Timetable		 0121 288 2107
Modification timetable:		Proposer: Nicola Lond National Gas Transmission
Pre-Modification Discussed	06 June 2024	 enquiries@gasgovernance.co.uk
Date Modification Raised	10 June 2024	 nicola.j.lond@nationalgas.com
New Modification to be considered by Panel	20 June 2024	 07824 551667
First Workgroup Meeting	04 July 2024	Transporter: Nicola Lond National Gas Transmission
Workgroup Report to be presented to Panel	21 November 2024	 nicola.j.lond@nationalgas.com
Draft Modification Report issued for consultation	22 November 2024	 07824 551667
Consultation Close-out for representations	12 December 2024	Systems Provider: Xoserve
Final Modification Report available for Panel	17 December 2024	 UKLink@xoserve.com
Modification Panel decision	16 January 2025	

1 Summary

What

The National Grid Gas Markets Plan (GMAP) "[Implementing the proposed gas quality standards](#)" project report (2021) recommended greater transparency in gas quality specifications for new connections.

The final report concluded that although there were inconsistencies that need to be resolved, consideration should be given to the risk of increased burden on new connecting sites and recommended that further engagement was required. It also recommended that it is only a request sitting outside of the published ranges where an industry engagement should be required, allowing the industry the opportunity to raise concerns.

This Modification seeks to allow greater transparency when a new connection requests a non-standard gas quality parameter. A "non-standard" gas quality parameter is that which is outside of the specification published by National Gas Transmission (NGT), which is currently contained within the [Gas Ten Year Statement \(GTYS\)](#) | [National Gas](#)

In particular, the two parameters we expect this will impact the most will be Oxygen and Carbon Dioxide.

Why

The main driver for this Modification now is related to NTS connection requests relating to the Oxygen Specification. The feedback NGT has received from the developers of new biomethane production facilities wishing to connect to the NTS, makes it clear that the current NTS Oxygen specification hinders the viability of a project to connect. NGT want to facilitate green gas onto the NTS. As this is expected to be in small quantities compared to the NTS pipelines capability then we do not consider this to be a material risk. NGT is therefore, pursuing an exemption to the Gas Safety (Management) Regulations (GS(M)R) with the Health and Safety Executive (HSE).

As demand for connections increases, the likelihood of requests outside of GS(M)R is also expected to rise, in particular, from biomethane producers. Therefore, we propose that this now provides a greater need for transparency on requests for any parameter outside of our standard gas quality NTS specifications. This is to allow customers in the vicinity of the new connection to be aware and allow NGT to demonstrate how we have considered the impact on potentially sensitive customers.

When an existing entry connection on the NTS wishes to modify their Gas Entry Conditions they are required to follow the obligations allowing for transparency under the UNC within TPD I.

The current published NTS Gas quality Specification for reference is as follows:

Gas element	Quality requirement
Hydrogen Sulphide	Not more than 5 mg/m ³
Total Sulphur	Not more than 50 mg/m ³
Hydrogen	Not more than 0.1% (molar)
*Oxygen	Not more than 0.001% (molar)
Hydrocarbon dewpoint	Not more than -2°C at any pressure up to 85 barg
Water dewpoint	Not more than -10°C at 85 barg
Wobbe Number (real gross dry)	The Wobbe number shall be in the range 47.20 to 51.41 MJ/m ³
Incomplete combustion factor (ICF)	Not more than 0.48
Soot index (SI)	Not more than 0.60
*Carbon dioxide	Not more than 2.5% (molar)
Containments	The gas shall not contain solid, liquid or gaseous material that might interfere with the integrity or operation of pipes or any gas appliance, within the meaning of regulation 2(1) of the Gas Safety (Installation and Use) Regulations 1998, that a consumer could reasonably be expected to operate.
Organo halides	Not more than 1.5 mg/m ³
Radioactivity	Not more than 5 becquerels/g
Odour	Gas delivered shall have no odour that might contravene any statutory obligation. GS(M)R states transmission or distribution of odoured gas is not permitted at a pressure above 7 barg.
Pressure	The delivery pressure shall be the pressure required to deliver natural gas at the delivery point into our entry facility at any time, taking into account the back pressure of our system at the delivery point, which will vary from time to time. The entry pressure shall not exceed the maximum operating pressure at the delivery point
Delivery Temperature	Between 1°C and 38°C
Mercury	No more than 10 µg/m ³
*Requests for higher limits will be considered	

How

To address the above points and based on the potentially increasing NTS connection volumes, it is proposed that UNC be modified to take into account the following considerations.

Transparency to industry – This should allow transparency as to what is proposed to be agreed with a new connection if it is outside of the NGT current published specification. It should not add a significant process. The extent of what should be shared and for what benefits would be points for discussion in the development of this Modification.

Timescales - TPD Section V.13 sets out the Connection timelines allowing 3, 6 or 9 months for the issue of a Full Connection Offer. NGT is conscious that the connection timeline and cost for connecting parties should not be adversely impacted in achieving the objective of greater transparency and is seeking to limit additional processes as much as possible.

Balanced approach – An efficient and proportionate solution which has a balanced approach between the transparency objective and consideration for the connection timeframe for the connecting party.

Risk assessment Process – NGT propose to carry out a site-specific assessment for each new request outside of the NGT specification to assess impact to the network assets and connection customers.

2 Governance

Justification for Self-Governance

This Modification seeks to improve transparency. It is not considered to have a material impact on consumers, competition, operation of the pipeline systems, matters relating to sustainable development, safety or security of supply, or the management of market and network emergencies or the UNC governance procedures and does not discriminate between different classes of parties.

Requested Next Steps

This Modification should:

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

3 Why Change?

The main driver for this Modification now is the increased volume of connection applications from biomethane developers which require a lower oxygen specification to make a connection to the NTS viable. This has already been seen in the Distribution Networks.

As concluded by The Gas Markets Plan (GMAP) report, this requirement for increased transparency is to address the gap between new and existing connections gas quality obligations.

Currently, the UNC has no obligations for any information relating to a new connections gas quality to be shared regardless of the request, which NGT agrees bilaterally with the connecting party.

The benefit of this UNC Modification is to exit customers directly connected to the NTS so that they can be aware of any likely change to specification of gas in the NTS which may impact them.

The benefit to all users is increased visibility of gas quality connecting to the NTS. As we have increasing demand for more differing kinds of connection and potentially larger volumes of a diverse range of gas quality requests, this is expected to be more relevant.

UNC TPD section I 2.2 Amendment of Network Entry Provisions sets out how a provision is modified to an existing site and the process for this. This is for the amendment of existing Network Entry Provisions only within an existing entry agreement.

There is no such provision for new connections and therefore no visibility of any request that is outside of the expected specification.

If the UNC were not changed then these agreements could remain non-transparent to end users in advance of connection to the NTS and this inconsistency would remain between new and existing connections. If the UNC is not modified, then NGT would not have any obligation to share any information and in turn the applicant of the connection request would have no obligation to allow NGT to share such information.

4 Code Specific Matters

Reference Documents

[Gas Safety \(Management\) Regulations 1996 \(legislation.gov.uk\)](https://legislation.gov.uk)

Knowledge/Skills

Guide to changing existing parameters: [A4 simple report 1-col no divider Nov 2019 \(nationalgas.com\)](#)

For information when a connection application is submitted to NGT certain terms of the UNC are applied to the connection application. This would require review depending on the outcome of this Modification to align obligations accordingly with the connecting party. Currently Terms under TPD sections B, S, V and Y are applied.

5 Solution

It is proposed that UNC is modified to include an obligation on NGT to engage with industry as appropriate to share information relating to NGT considering/ agreeing to a new non-standard gas quality specification for a new connection. This is to be developed at Workgroup to determine the solution.

TPD section I related clauses for consideration in this Modification are as follows:

2.2 Amendment of Network Entry Provisions – sets out how a provision is modified and the process. This is for an existing provision within an existing Network Entry Agreement

2.4 Gas Entry Conditions – sets out the gas quality components included.

TPD section V 13 NTS CONNECTIONS – this sets out the connections process for new connections. It may be therefore relevant to update this section. The solution should be limited to the minimum requirement so as not to increase the connection timeline and have minimal impact on the process, whilst increasing the transparency of information to industry.

The objective of the data shared should be to both inform industry of the potential for an increased gas quality specification range and also to re-assure that NGT have fully considered any impact to the NTS and connected customers who may be affected.

The solution also needs to consider any confidentiality of the connecting parties project. NGT may be limited by confidentiality in sharing certain information.

It is suggested that the solution is discussed at Workgroup as to what would be required to fulfil the need in terms of the following:

1. Information required appropriate to the need
2. Timings of required information
3. Methods of communication appropriate

For information, NGT is working in parallel on the GS(M)R oxygen exemption case and the potential process required.

6 Impacts & Other Considerations

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

No

Consumer Impacts

Any directly connected party to the NTS that takes gas from an exit point could be impacted by this Modification and in particular any operators who are sensitive to higher levels of Oxygen or Carbon Dioxide. We believe this to be the case for Salt cavity Storage sites, Interconnectors and potentially some Industrial customers. Engagement is ongoing to fully understand this, and this would also be part of the Modification workgroup engagement. These customers in particular would benefit from increased transparency.

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

All NTS directly connected customers and in particular those who are sensitive to the component would benefit from greater transparency of gas quality information on non-standard gas quality connecting to the NTS.

Currently there is no obligation to make any information available. In practice, as a prudent operator, NGT will endeavour to inform operators directly if an impact is foreseen.

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 Currently no information has to be made available to NTS directly connected parties on new connection gas quality. This would improve that service.	Positive
Benefits for society as a whole	None

Performance Assurance Considerations

None

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.	None
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	Positive

(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 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

Relevant objective d) Securing of effective competition between relevant shippers;

This Modification will create a more level playing field in terms of the transparency requirements for gas quality information between new and existing connected parties.

8 Implementation

No specific implementation date is proposed. 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.

9 Legal Text

Legal text will be drawn up by NGT when the Modification is sufficiently developed in line with the [Legal Text Guidance Document](#).

Text Commentary

To follow

Text

To Follow

10 Recommendations

Proposer’s Recommendation to Panel

Panel is asked to:

- Agree that Self-Governance procedures should apply.
- Refer this proposal to a Workgroup for assessment.