

IGT 172 Optional service for physical gas entry into an IGT Pipeline and into the UNC Total System marrying to UNC Mod 0842

Background:

At the December IGT 172 workgroup, the Central Data Services Provider (CDSP) took an action to share the Modification 0842 Central Impacts paper from July Distribution Workgroup with January-24 IGT workstream. This is because UNC IGT 172 has been raised to ensure that the solution in Modification 0842 is also replicated in IGT UNC.

The Central Impacts paper considered whether the Modification 0842 solution would have any downstream impact/s on the CDSP systems and services. Please see the paper below which has been slightly amended to reflect that this paper is for IGT workstream.

What, if any, are the central impacts of Modification IGT 172?

- Based on the proposal within Modification 0842 which Modification IGT 172 is seeking to facilitate within IGT UNC, the CDSP understand that these sites will be set up as new entry points and function like existing biomethane sites (for example). This means the Shipper has to nominate and the relevant data must be sent to the CDSP, which includes Energy Balancing information and Flow Weighted Average CV (FWACV) data.
- The principle is that IGTs will be responsible, but they will utilise the GDN to facilitate the requirement which will include providing the relevant information to the CDSP. In Modification 0842 this point is called out in Business Rule 9 and Clarification point 4. Please see extracts below:

Business Rule 9 (UNC 0842)

- 9 BR9. The Network Entry Agreement and the new 'tripartite operator to operator' agreement will require the IGT to provide or to ensure the provision to the DN Operator of the quantities of gas and determined CV at the IGT SEP.

Clarification Point 4 (UNC 0842)

4. The DNO, IGT and gas production operator will manage and operate the flow and monitoring of the gas onto the Total System in line with an agreement. Note, arrangements may be entered into between the IGT and the relevant DNO to facilitate this requirement where this an additional cost to the DNO in facilitating this service on an enduring basis. This will be enshrined in a separate arrangement outside the scope of the UNC.

- The CDSP working assumption based on conversations with the proposer and Distribution Workgroup (plus Modification 0842), is that the data required for central processes and associated services will continue to be sent by existing parties and utilise existing interfaces, systems and processes. This would mean, IGTs utilising the GDNs to fulfil the requirement.

- We would expect this to be reflected in the UNC IGT 172 legal text. The below tables in IGT 172 outline a similar requirement:

The proposed 'operator to operator' agreement at the physical interface between gas producer and Pipeline as proposed by UNC Mod 0842

Upstream Party	Downstream Party	Agreement
Non-IGTAD party (owns and maintains apparatus)	Pipeline Operator (owns and maintains Pipeline apparatus) and Large Transporter (controls the Pipeline Operator's valve)	UNC Mod 0842 "...an agreement the (<i>'tripartite agreement'</i>) between the DN Operator, the IGT and the gas production operator of the facility connected to the IGT System in relation to the (corresponding) IGT SEP' [to] 'contain provisions equivalent to Network Entry Provisions and Local Operating Procedures – i.e. rules specifying requirements for the delivery of gas to the Total System at the IGT LDZ SEP and the IGT SEP."

The proposed 'operator to operator' agreement at the physical interface between Pipeline and Large Transporter System as proposed by UNC Mod 0842

Upstream Party	Downstream Party	Agreement
Pipeline Operator (owns and maintains apparatus)	Large Transporter (owns and maintains apparatus)	IGT LDZ Network Entry Agreement (between the DNO and the IGT) which treats the provisions in the <i>tripartite agreement</i> ... as Network Entry Provisions and Local Operating Procedures."

- Based on the information we have, the CDSP do not believe it is the intention of either 0842 or IGT 172 to use any other mechanism to send the required data to the CDSP. But to clarify, if IGTs want to directly share relevant information to the CDSP for associated services in the future, this would be a new service that would need to be assessed, requirements gathered and ultimately delivered. This is because, currently there isn't a requirement for the IGTs to send this information and for example, the FWACV service is only available for GDNs.
- If IGTs wanted to explore the route of providing the data directly rather than using the GDN once 0842 and IGT 172 have been implemented (subject to Authority approval), this would need to be raised through a DSC Change Proposal.
- Based on discussions to date, and the latest version of 0842 and IGT 172, the understanding is that IGTs would utilise the GDNs to provide the necessary data and information to the CDSP, the required processes are already in place for this therefore no further implementation would be required centrally as it would be BAU activities.