

## Consultation Response

# IGT172: Provision for Gas Entry within the IGT UNC

Responses invited by: 17<sup>th</sup> April 2024

### Respondent Details

Name: David Mitchell

Organisation: SGN

Support Implementation

~~Qualified Support~~

~~Neutral~~

~~Do Not Support~~

### Please briefly summarise the key reason(s) for your support / opposition

SGN supports this modification proposal as its implementation will facilitate the flow of new sources of gas being entered onto the total system from an Independent Gas Transporter (iGT) pipeline via a Distribution Network Operator (DNO) network. This modification is required to establish gas entry requirements in the iGT UNC that don't currently exist and to facilitate the transfer of title and risk of the gas between code parties. If this modification is not approved then UNC Modification 0842 Gas Entry onto the Total System via an Independent Gas Transporter cannot be implemented as it is reliant on this modification also being implemented.

It is also worth mentioning that this modification will help to facilitate the expansion of the Green Gas Support Scheme aimed at expanding UK produced gas.



### **Authority Decision Statement**

**Do you agree with the Modification Panel's determination with respect to whether or not this should be an Authority Decision modification?**

We believe that this modification should be subject to an authority direction as this is the case with UNC modification 0842 that will also be determined by the authority.

### **Please state any new or additional issues that you believe should be considered**

None identified.

### **Relevant Objectives**

**How would implementation of this modification impact the relevant objectives?**

SGN believes that the implementation of this modification will support Relevant Objective (A) and (B) by facilitating the economic and efficient operation of the pipelines system as it will enable additional connections of new sources of gas to be added to the Total System by various gas transporters who are accredited to undertake this process.

### **Impacts and Costs**

**What development and ongoing costs would you face if this modification was implemented?**

SGN has not identified any ongoing costs at this point in time however we expect these to be minimal.

### **Implementation**

**What lead time would you wish to see prior to this modification being implemented, and why?**

This modification can be implemented as soon as practicable following an authority decision to do so.



## **Legal Text**

**Are you satisfied that the legal text will deliver the intent of the modification?**

We are satisfied that the legal text will deliver the intent of the solution.

**In addition, the IGT UNC Panel are particularly interested in parties' views in respect of the commercial arrangements that would be needed as part of implementing this Modification?**

SGN has nothing to add to this question.

## **Further Comments**

**Is there anything further you wish to be taken into account?**

We have no further comments to add.

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**