

Modification	At what stage is this document in the process?
IGT176: Changes to IGT UNC to enable UNC0887 ‘Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS’	01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification Report
Purpose of Modification: This Modification identifies the requirement for and aims to make changes to IGT UNC to enable UNC0887 ‘Facilitating Bi-Directional Connections Between IGT Pipelines and the National Transmission System (NTS)’ ‘to be implemented by including its operator, National Gas Transmission (NGT) as a ‘Large Transporter’ and to apply the core IGT concept of ‘deeming flow’ to and from the National Balancing Point (NBP), whilst replicating as closely as practicable the existing NTS ‘direct connect’ exit and entry arrangements that UNC Shippers use.	
	The Proposer recommends that this Modification should be: - assessed by a Workgroup before proceeding to Consultation; and - be subject to an Authority Decision. This Modification will be presented by the Proposer to the Panel on 28th March 2025. The Panel will consider the Proposer’s recommendation and determine the appropriate route.
Impacted Parties and Codes	
	High Impact: <u>Developers</u> of gas production facilities for whom delivery to/from the NTS via an IGT network is optimal, <u>Pipeline Operators</u> that accept delivery of gas to their network(s)
	Medium Impact: None
	Low Impact: Large Transporters and Pipeline Users

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Timetable

The Proposer recommends the following timetable:

Modification Raised	19 th March 2025
Initial consideration by Workgroup	10 th April 2025
Amended Modification considered by Workgroup	-
Workgroup Report presented to Panel	27 th June 2025
Draft Modification Report issued for consultation	30 th June 2025
Consultation Close-out for representations	21 st July 2025
Variation Request presented to Panel	-
Final Modification Report available for Panel	22 nd August 2025
Modification Panel Recommendation	29 th August 2025



Any questions?

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1 Summary

What

Today, UNC Independent Gas Transporters Arrangement Document (IGTAD) provisions apply only between IGTs and Distribution Network Operators (DNOs), with NGT's NTS being outside its scope. Similarly, IGT UNC applies only to conveyance of gas to/from DNs and IGTs. [UNC0887](#) intends to remedy this by changing UNC IGTAD from currently being applicable to only Distribution Network Operators and IGTs, to include NGT as operator of the NTS. This would provide a foundation for NGT to offer services as a 'Large Transporter' to IGTs.

Whilst IGT UNC, post [IGT172](#), includes provisions that are appropriate for direct entry of gas to an IGT network and onto the NTS without change, as UNC Transportation Principal Document (TPD's) provisions for gas to consumers differs between Local Distribution Zone (LDZ) and NTS Supply Points, and IGT UNC replicates only LDZ Supply Point provisions (there never having been a need to replicate NTS), IGT UNC is silent on how gas flowing from the NTS to an IGT network and onward to consumers could be treated.

At first glance UNC0887 may appear to only directly prescribe a couple of instances where IGT UNC may require change, however its stated purpose of 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS' is based on the arrangements between Transporter and Shipper being the same whether direct connect or via IGT, so it indirectly drives a need for NTS direct connect Supply Point administration to be added to the IGT UNC. For example, a key element is that IGT NTS exit points should be treated as Class 1 'non-Central Switching Service (CSS)', as that is how NTS direct connects are treated, however whilst IGT-UNC has the concept of Class 1 which replicates UNC provisions, it does not replicate the UNC's 'Non-CSS' arrangements. A few relatively minor amendments to replicate this and other UNC provisions are also required. This Modification Proposal seeks to remedy this and to enable the implementation of UNC0887.

Why

A number of developers, due to their potential project's geographical location, are looking at injecting new biomethane gas from anaerobic digester (AD) plants to potential IGT networks that would be connected to the NTS, creating the requirement to flow gas from an IGT to the NTS. Similarly, some developers require connections to the IGT network that offtakes gas.

How

NGT has raised UNC0887 to add provisions to the UNC, principally covering:

- Point Definition (including NTS exit being 'Class 1' and 'Non-CSS')
- NTS Access: NTS Entry and NTS Exit Capacity
- Measurement and Energy Balancing
- NGT Transportation Charges.

IGT176 is proposed to marry to this by codifying arrangements between Pipeline Users and Pipeline Operators to make the Cross Code arrangements work.

The main proposal is to incorporate into the IGT UNC, the UNC's 'Non-CSS' provisions, with minor associated additions and consequential changes to other existing IGT UNC Parts where they are needed.

2 Governance

Justification for Authority Direction Procedures

This Modification is a marry to UNC0887, with the overarching objective that they work together to allow new sources of gas into and out of the Total System through a new, additional route. The Modification is particularly aimed at allowing increased volumes of biomethane and other green gases to be injected.

The UNC Modification Panel determined that UNC0887 is a material change that warrants an Authority decision, so this Modification should follow the same governance, ideally with the two being considered together by the Authority.

Requested Next Steps

This Modification should:

- be considered a material change and not subject to Self-Governance; and
- be assessed by a Workgroup before proceeding to Consultation.

3 Why Change?

Overview

General

IGT UNC today comprises a collection of provisions between DNOs (defined as 'Large Transporters') and Shippers, and only contains provisions relevant to DNOs. It is silent on NTS as NGT is not, and was not, intended to be a party.

Under UNC0887, IGTAD is proposed to be changed from being a collection of provisions between DNOs (defined as 'Large Transporters' in IGT UNC) and IGT Users, to their being binding on an expanded definition of 'Large Transporters' comprising DNOs, and NGT as operator of the NTS.

IGTAD	
<i>"Section A – Scope and Classification"</i>	
1	<i>Introduction</i>
1.1	<i>Independent Gas Transporter Arrangements Document</i>
1.1.1	<i>The Independent Gas Transporter Arrangements Document sets out:</i>
	(a) <i>rights and obligations as between DN Operators and Independent Gas Transporters in relation to the connections between their respective DNO Systems and IGT Systems;</i>
	(b) <i>rights and obligations as between National Gas Transmission and Independent Gas Transporters in relation to the connections between the NTS and IGT Systems; and</i>

- (c) *the basis of implementation of certain provisions of the Transportation Principal Document in relation to CSEP System Exit Points, **USEP System Entry Points** and IGT LDZ System Entry Points.*

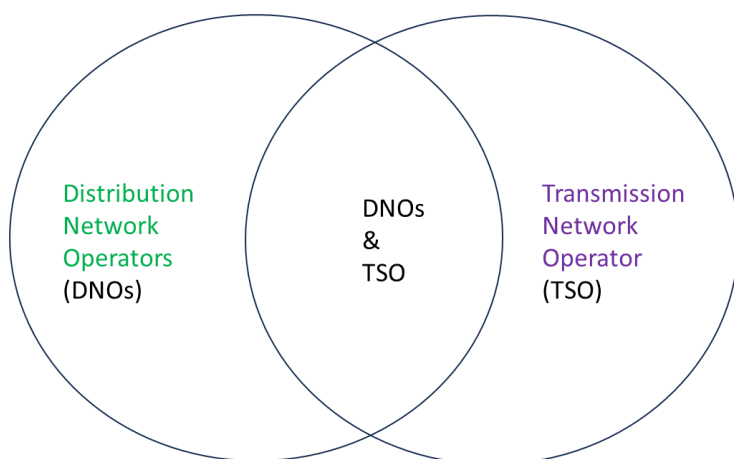
Excerpt from UNC IGTAD Section A

If IGT UNC is to remain compatible with UNC, a first step is that relatively minor definitional changes to include NGT as a 'Large Transporter' alongside DNs are required.

IGT UNC Part N 1.2.1 (b), referred to above, would also require a minor change, as DNO and NGT Licence Conditions differ, A15 being the NTS equivalent on the DNO's A15A.

Further to the above example, various amendments will be needed to identify and clearly indicate provisions:

- that should be restricted to DNO only (as they are not relevant to NTS exit);
- that should apply equally to DNOs and NGT in their capacity as 'Large Transporters'
- that need to be introduced to apply to NTS only



Entry

In respect of new entry of gas to the NBP via an IGT pipeline, UNC0887 proposes replicating the core provisions set out under [UNC0842 'Gas Entry onto the Total system via an Independent Gas Transporter'](#), with a relatively small number of changes to reflect the differential treatment of NTS entry compared to DN/LDZ entry in UNC TPD (most notably in respect of UNC capacity).

For brevity, the UNC specific detail around this has not been duplicated here but can be found in the UNC887 proposal and its associated Modification Report.

As UNC0887 follows UNC0842 by only a few months and UNC0842 was drafted to be sufficiently flexible to include future NTS entry, the IGT UNC changes to make the entry element of the Cross Code solution work are straightforward.

Exit

'Introduction to the IGT UNC' page 1 states:

"To make the industry as efficient as possible, the IGTs have adopted, wherever relevant, the same processes as those operated by the Large Transporters. The outcome of this change is that all Gas Shippers can be confident that, in general, the way they manage the transporter

interaction for retail consumers, will be carried out in an identical manner irrespective of whether that consumer is located on a Large Transporter network or an IGT network.”

A key requirement of UNC0887 marry is therefore that Shipper interactions regarding Supply Point arrangements for indirectly connected NTS are to be treated identically to directly connected equivalents.

UNC0887 proposed legal text (IGTAD Section D 2.1.4) emphasises this by stating that ‘an IGTS Supply Meter Point on a NTS-Connected IGT System must be classified as Class 1’.

Existing UNC TPD states that NTS direct connects are ‘Non-CSS’:

UNC TPD Section G (as is)
1.2.2 All LDZ Supply Meter Points, except for LDZ Shared Supply Meter Points and Unlicensed Supply Meter Points are CSS Supply Meter Points; and all NTS Supply Meter Points, LDZ Shared Supply Meter Points and Unlicensed Supply Meter Points are Non-CSS Supply Meter Points.

Excerpt from UNC TPD Section G

UNC TPD has two defined terms that expand upon it and are used in the Section:

UNC TPD Section G (as is)
1.2.1 ... “ (e) a “Non-CSS Supply Meter Point” is a Supply Meter Point which is not a CSS Supply Meter Point; (f) a “Non-CSS Supply Point” is a Supply Point which comprises a Non-CSS Supply Meter Point; “ ...

Excerpt from UNC TPD Section G

IGT UNC Part CI does not use the UNC’s concept of ‘non CSS’ and omits replication of 1.2.1 (e) and (f) above.

Instead, IGT UNC Part CI has the following, which is incompatible with UNC 887:

IGT UNC Part CI
1.5 The REC, and CSS Supply Points <i>For the purposes of the Code:</i> ...

(f) All Supply Meter Points are CSS Supply Meter Points.

Excerpt from IGT UNC Part CI

The above is a selection of non-exclusive examples that illustrate the need for change. Section 5 of this document (Solution) expands on these and the proposed solution.

4 Code Specific Matters

Technical Skillsets

None specifically, although an understanding of how LDZ gas entry works in UNC and provisions in both Codes concerning operator to operator agreements would be helpful across the UNC and IGT UNC.

Reference Documents

Industry Codes

[IGT UNC](#)

[UNC IGTAD](#)

[UNC TPD](#) Section G, as it applies directly to NTS direct connects and indirectly through pointing in IGTUNC (this Modification Proposal has focus on Clause 6 and associated 'Non-CSS' provisions)

UNC Modifications referred to in the proposal

[UNC0887 – 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#)

[UNC0842 – 'Gas Entry onto the Total system via an Independent Gas Transporter'](#)

[IGT172 - 'Provision for gas entry within the IGT UNC'](#)

5 Solution

Summary of Proposed Solution

UNC887 seeks to make changes to UNC IGTAD and will include definitional changes, treatment of and charging for NTS capacity and use of system for the NTS, measurement and energy balancing.

This IGT UNC Modification consists of elements, which will complete the marriage of IGT UNC to UNC0887, with the overarching objective that the two Codes work together when gas enters directly into an IGT network and is transported to a Large Transporter System.

The examples in Section 3 'Why Change' indicate that key features of the IGT176 solution are:

- Minor definitional changes to include, but are not limited to adding NGT as a 'Large Transformer' alongside DNs;
- Replication of the UNC's 'Non-CSS' provisions so that Supply Point Administration (SPA) for indirectly connected NTS exit is treated identically to direct connect equivalents;
- In accordance with UNC0887 legal text proposed addition IGTAD Section G4, adding the right for an IGT to insist on an equivalent to a Network Exit Agreement (NExA); and

- Introduce in IGT UNC, non-charging related provisions similar to the ones applicable to NTS entry in UNC TPD Section J, to apply to Pipeline Operators and Pipeline Users, when gas is entered directly into an IGT network from a gas delivery facility, for onward conveyance to the NBP via the NTS.

The following sub headed topics provide initial thoughts on how the examples in Section 3 ‘Why Change’ could be addressed. This illustrates the proposed approach and the relative simplicity of change, although the number of changes may be quite high in number.

Adding NGT alongside IGTs and DNOs within IGT UNC

As outlined in Section 3 ‘Why Change’ under UNC0887, IGTAD is proposed to be changed from being a collection of provisions between DNOs (defined as ‘Large Transporters’ in IGT UNC) and IGT Users, to their being binding on an expanded definition of ‘Large Transporters’ comprising DNOs, and NGT as operator of the NTS.

If IGT UNC is to remain compatible with UNC, a first step is that relatively minor definitional changes to include NGT as a ‘Large Transporter’ alongside DNs are required as shown below:

IGT UNC “PART M – DEFINITIONS (as is)	
<i>The following definitions shall apply:</i>	
"Large Transporter" <i>National Grid Gas plc and/or as the context permits the DN Operator which operates the pipeline system immediately upstream of the CSEP;</i>	References to ‘National Grid Gas plc’ would appear to be intended to apply to Cadent, however fortuitously, if it was to be changed to ‘National Gas Transmission plc’ it would work
"Large Transporter CDSP Licence Condition" <i>shall have the meaning in Part N 1.2.1(b);</i>	See comment on Part N below
"Large Transporter System" <i>the main pipeline systems operated by National Grid Gas plc and the DN Operators the conveyance of gas through which is authorised by one or more gas Transporter Licences;"</i>	See comment on ‘Large Transporter’ definition above

Excerpt from IGT UNC Part MI

Amending the DNO Licence Condition reference in IGT UNC to also incorporate the TSO equivalent

IGT UNC Part N 1.2.1 (b), referred to in the diagram above, would also require a minor change, as DNO and NGT Licence Conditions differ, A15 being the NTS equivalent on the DNO’s A15A.

IGT UNC PART N – CDSP AND UK LINK (as is)	
1	GENERAL

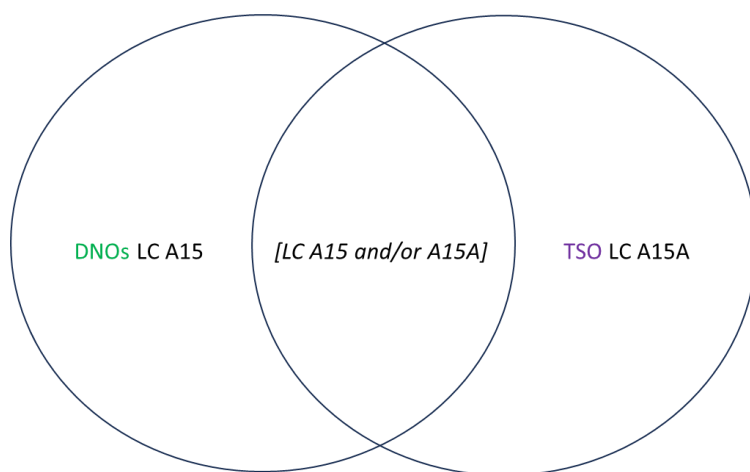
1.2 Interpretation

1.2.1 For the purposes of the Code:

- (a) the **"Central Data Services Provider" or "CDSP"** is the person for the time being appointed by the Large Transporters as central data services provider pursuant to the Large Transporter CDSP Licence Condition;
- (b) the **"Large Transporter CDSP Licence Condition"** is Standard Special Condition **A15A** of Gas Transporter's Licences;"

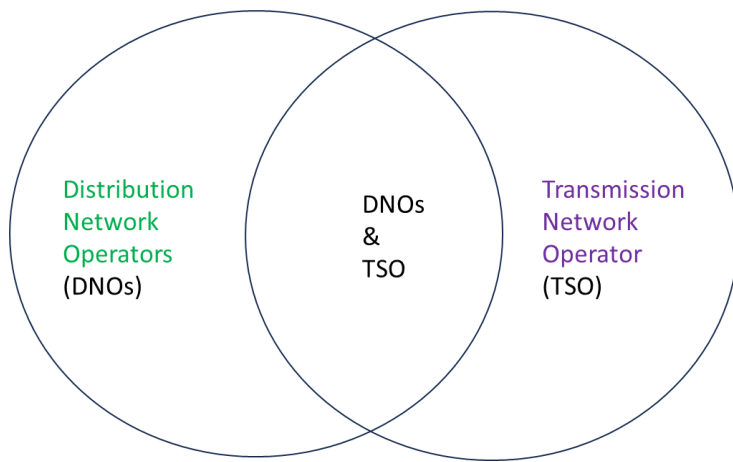
Excerpt from IGT UNC Part N

This could easily be accommodated by the addition of 'and/or A15' at the end, but this is only a simple example of a wider need for the same approach throughout IGT UNC. The diagram below illustrates NGT being shown as TSO:



As described in Section 3 'Why Change' of this document, various amendments will be needed to identify and clearly indicate provisions:

- d) that should be restricted to DNO only (as they are not relevant to NTS exit);
- e) that should apply equally to DNOs and NGT in their capacity as 'Large Transporters'; and
- f) that need to be introduced to apply to NTS only:



Entry

Minor consequential changes are required to IGT UNC Part Q to knit together existing provisions with the proposed new content.

Exit

Ensuring harmonisation of treatment of NTS pressure administration between UNC and IGT UNC

As described in Section 3 'Why Change' of this document, IGT UNC Part CI does not use the UNC's concept of 'Non-CSS' and omits replication of 1.2.1 (e) and (f) above.

Instead, IGT UNC Part CI 1.5 has provisions which are incompatible with UNC0887.

This is easily remedied though the deletion of IGT UNC Part CI Clause 1.5 (d) in Section 3 'Why Change' as above, and replacing it with a modified version of UNC TPD Section G 1.2.1(h) as below (replicated, with change, additional UNC TPD Section G wording):

IGT UNC Part CI (proposed)	
1.5	The REC, and CSS Supply Points
<i>For the purposes of the Code:</i>	
....	
<i>(If)</i> <u>UNC TPD Section G 1.2.2 shall apply with the following changes: The words 'LDZ Supply Meter Points, except for LDZ Shared Supply Meter Points and Unlicensed Supply Meter Points are CSS Supply Meter Points; and all' and 'LDZ Shared Supply Meter Points and Unlicensed Supply Meter Points' shall not apply"</u>	

Excerpt from IGT UNC Part CI as proposed

Replication of additional UNC Section G wording:

IGT UNC Part CI (proposed)

1.5 The REC, and CSS Supply Points

For the purposes of the Code:

....

(d) a **“Non-CSS Supply Meter Point”** is a Supply Meter Point which is not a CSS Supply Meter Point;

(e) a **“Non-CSS Supply Point”** is a Supply Point which comprises a Non-CSS Supply Meter Point;

Excerpt from IGT UNC Part CI as proposed

Further consequential changes are required to IGT UNC Q to knit together existing provisions with the proposed new content, perhaps the one requiring the most words is to reinstate all relevant ‘Non-CSS’ mentions in UNC TPD Section G that are currently ‘turned off’ in Part CI.

6 Impacts & Other Considerations

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

No. There is no identified impact on SCRs or other significant industry change projects.

Consumer Impacts

What is the current consumer experience?

Minor. The changes proposed here constitute commercial rules to apply at a new type of inter-Transporter point of connections including arrangements which ensure gas is fully accounted for when entering and exiting the GB network. However, if this means that additional gas enters the network, and particularly green gas, there would be marginal consumer benefits. Diversification of GB domestic gas sources will have a positive impact on Security of Supply.

What would the new consumer experience be?

At present, neither the UNC nor the IGTUNC contemplate bi-directional connections between the NTS and IGT Pipelines which deliver gas to, and offtake gas from, the NTS in the manner set out in UNC0887 and this Proposal. If the two proposals are implemented, the two Codes would be explicit in defining such points of connection (to the NTS) and the associated commercial arrangements, which will ensure effective integration into the prevailing regime. This will provide clarity for all stakeholders (including consumers) on the applicable arrangements. This Modification will result in increased injection to the grid of bio-methane which helps towards Net Zero targets.

Impact of the change on Consumer Benefit Areas	
Area	Identified Impact
Improved safety and reliability No Change as the new sources of gas would not materially improve the security of supply.	None
Lower bills than would otherwise be the case No change as the additional sources of gas would not be material in volume.	None
Reduced environmental damage A growing number of bio-methane producers want to inject green gas onto the Total System, this modification allows this to take place and will expand this market which will have a positive impact on Greenhouse Gas Emissions by allowing Pipeline Operators to provide this facility.	Positive
Improved quality of service No change identified.	None
Benefits for society as a whole To the extent that some additional consumers connect to the GB gas network, there would be a marginal benefit with the potential for cost reductions and job creation. Plus jobs would be created at new gas production facilities, and new gas production facilities would reduce energy imports to the extent that additional green gas is injected.	Positive

Cross-Code Impacts

Almost all the requirements for gas entering and exiting an IGT network to make UNC0887 work are already covered, including recent IGT UNC changes introduced by [IGT172 – Provision for gas entry within the IGT UNC](#), which was implemented on 12th August 2024.

Analysis of the drafting of legal text for UNC0887, which is in the final stages of Workgroup development, identified that a small number of additional mirrored arrangements are required in the IGTUNC; This Modification Proposal aims to provide these. A key example is the introduction of switching rules for Non-CSS sites in the IGT UNC.

UNC	☒
REC	☐
Other	☐
None	☐

Environmental Impacts

Biomethane is generally produced with a flat profile as it is made from a 24/7 biological process. The producers cannot flare biogas other than for safety reasons and so they need the gas grid to have capacity for 100% of the time. There are good sources of feedstock that may not be near the existing gas

grid but are suitable for AD but need a connection pipeline, typically at LTS pressure which is high capex. This modification would allow such projects to use an IGT network and will expand this market which will have a positive impact on Greenhouse Gas Emissions by allowing Pipeline Operators to provide this facility.

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:

Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	Positive
(B) Co-ordinated, 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	Positive
(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 agreements 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 Cooperation of Energy Regulators	None

(A): The proposed new IGT network entry service will enable more connections of low carbon footprint biomethane, and the increased competition in routes for such green 'gas to grid', together with increased diversity in supply, will enhance the economic and efficient operation of the pipeline.

(B): By enabling a new IGT network entry service that is based on and dovetails with the established UNC equivalent, this Mod provides consistency throughout both the UNC and the IGT UNC.

(D): Is positively impacted because facilitating gas entry increases supply and hence the potential for facilitating effective competition among Shippers and Suppliers. Ensuring there are appropriate arrangements for all entry options facilitates competition between Gas Transporters.

8 Implementation

Proposer Recommendation

As this Modification Proposal will marry to UNC0887, implementation should be at the same time, ideally as soon as possible after an Authority Decision, as the service cannot work if either Modification is not approved.

At least one Pipeline Operator and one Shipper are keen to provide this service, with several potential Pipeline Delivery Facility Operators (mainly biomethane) with projects which would be economic if they could inject into existing IGT networks.

This Modification should therefore be implemented as soon as possible (supported by optional participation) and the arrangements outside code to support introduced similarly.

9 Legal Text

Approach

Draft legal text changes will be developed as part of this Modifications progression.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Authority governance procedures should apply; and
- Refer this proposal to a Workgroup for assessment.