IGT | UNC

Workgroup Report	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

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 Workgroup recommends that this Modification should: • be and Authority Decision Modification Proposal; and • proceed to Consultation. The Panel will consider this Workgroup Report on [dd month year]. The Panel will consider the recommendations and determine the appropriate next steps.
	**High Impact**: Developers of gas production facilities for whom delivery to/from the NTS via an IGT network is optimal, Pipeline Operators that accept delivery of gas to their network(s)
	**Medium Impact**: None
	**Low Impact**: Large Transporters and Pipeline Users

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Contents

Timetable

Modification timetable:

Modification raised	19th March 2025
Initial consideration by Workgroup	10th April 2025
Amended Modification considered by Workgroup	-
Workgroup Report presented to Panel	25th July 2025
Draft Modification Report issued for consultation	4th August 2025
Consultation Close-out for representations	25th August 2025
Variation Request presented to Panel	-
Final Modification Report available for Panel	18th September 2025
Modification Panel decision	25th September 2025

Any questions?

Contact:
Code Administrator

iGTUNC@Gemserv.com

02070901044

Proposer:
Nick King – CNG Services Ltd

nick.king@cngservices.co.uk

0121 247 8160

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.

Proposer's 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.

Workgroup Discussions / Conclusions (July 2025)

Insert text here

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

"Section A – Scope and Classification

1 Introduction

1.1 Independent Gas Transporter Arrangements Document

1.1.1 The Independent Gas Transporter Arrangements Document sets out:

(a) rights and obligations as between DN Operators and Independent Gas Transporters in relation to the connections between their respective DNO Systems and IGT Systems;

(b) rights and obligations as between National Gas Transmission and Independent Gas Transporters in relation to the connections between the NTS and IGT Systems; and

(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.

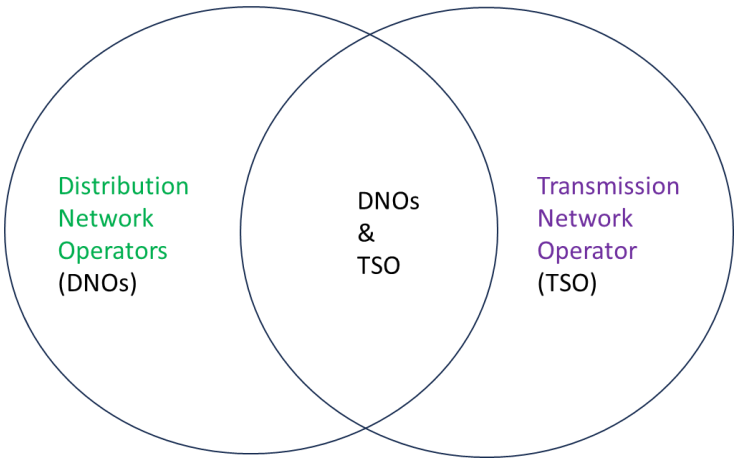
IGT UNC Part N 1.2.1 (b), referred to above, would also require a minor change, as DNO and NGT Licence Conditions differ, A15 being the NTS equivalent on the DNO's A15A.

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

a) that should be restricted to DNO only (as they are not relevant to NTS exit);

b) that should apply equally to DNOs and NGT in their capacity as 'Large Transporters'

c) 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 *For the purposes of the Code:*

…

(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)* ***The following definitions shall apply:***	
"Large Transporter" *National Grid Gas plc and/or as the context permits the DN Operator which operates the pipeline system immediately upstream of the CSEP;*	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" *shall have the meaning in Part N 1.2.1(b);*	See comment on Part N below
"Large Transporter System" *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;"*	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

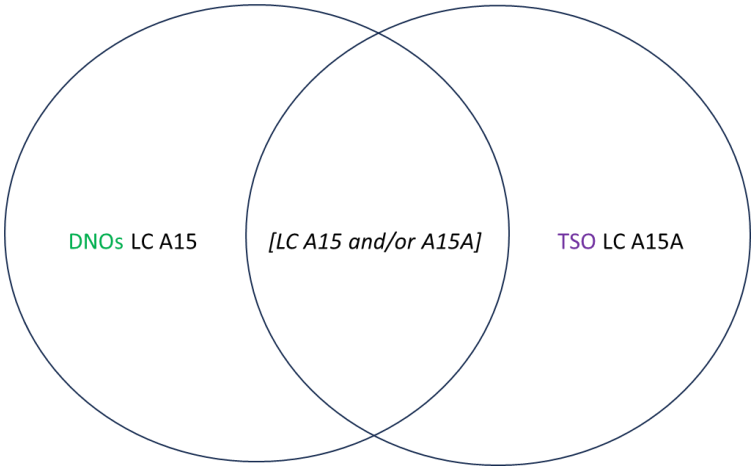
1.2.1 For the purposes of the Code:

*(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:

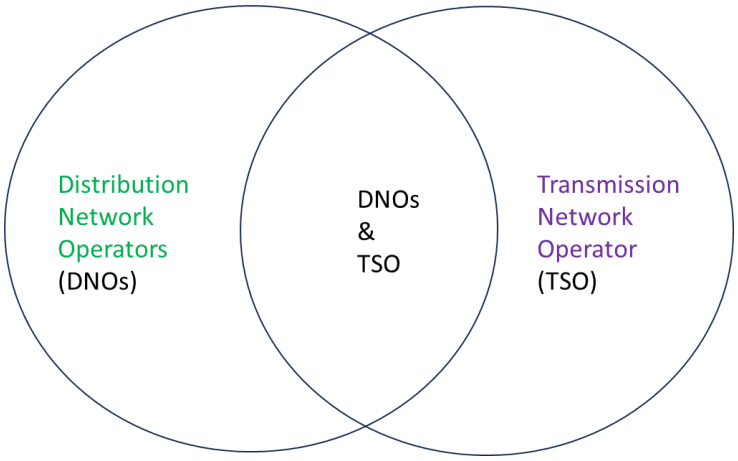


As described in Section 3 'Why Change' of this document, various amendments will be needed to identify and clearly indicate provisions:

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 *For the purposes of the Code:* *….* *([f]) 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"*

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.

Workgroup Discussions (May 2025)

The Proposer provided an overview of the Modification to the Workgroup, advising that the purpose of the Modification is to support the delivery of UNC0887. They took the Workgroup through the following areas of the IGT176 solution:

- Minor definitional changes to include, but are not limited to adding NGT as a 'Large Transformer' alongside DNOs;
- 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 Proposer asked how parties work within individual Code documents under the UNC. The Chair confirmed that the UNC has Shippers, Large Transporters and IGTs as parties to the whole of the UNC. However, not every party is required to do everything in every part of the Code. The IGTAD for example, is very specifically focused on what Large Transporters need from IGTs to ensure the integrity of the network.

The Proposer advised that the intention of UNC0887 is to include NGT as a relevant party to the IGTAD under the definition of Large Transporters. The Chair asked for confirmation of whether NGT, if being added as a party to the IGTAD, will now have requirements of IGTs which all IGTs then have the responsibility to deliver against if participating in the solution. The Proposer confirmed that this was the

case and noted that the obligations will only apply to the extent to which an IGT chooses to directly connect to the NTS. Nothing is intended to affect any distribution connected IGT.

How this Modification differs from IGT172

A Workgroup member asked what the difference was between this Modification and IGT172 - Provision for gas entry within the IGT UNC.

The Code Administrator advised that IGT172 allowed for an IGT to connect directly to a GDN. In the case of IGT176, the Modification is looking to allow an IGT to connect directly to the NTS, but the connection will be unmetered, unlike the GDN connection.

The Chair added that IGT172 did not have any implications for sites downstream of a GDN connection. However, this Modification is incorporating instructions and requirements for any Supply Points connected downstream of the NTS connection point.

There were no further questions raised.

Impacts on Shippers

The Proposer was asked whether the obligations being introduced into the IGT UNC will impact IGTs or Shippers as well. The Proposer advised that it impacts both IGTs and Shippers, but only where there is an IGT directly connected to the NTS.

A Workgroup member asked how Shippers will be impacted. The Proposer advised that it will only be the Shipper that will want to have either a gas entry point on a directly connected IGT network or to ship gas to an exit point off a directly connected IGT network. They imagine that any Shippers interested in this will be interested from the start as the driver will either be a very large gas consumer connection requirement or perhaps an anaerobic digestion connection. They advised that they cannot imagining any IGT wanting to do a speculative development of a directly connected pipeline.

They added that this Modification would allow for a scenario where there is a new large industrial load situated close to the NTS, but far away from a GDN. This means that, where previously a consumer may have considered a direct NTS connection, they might now consider connectin to an IGT that is then connected to the NTS.

The Code Administrator confirmed that from the Shipper's point of view, a Shipper looking to purchase biofuel and putting it into the network will be interested in terms of how they get can that gas into the network at that a specific point. The Shipper will also be interested should it want to supply any of the sites downstream of that connection.

There were no further comments raised.

Non-standard sites and switching

The Chair noted that there may need to be consideration at some point regarding nested CSEPs but perhaps not something that can be answered now. They asked further about whether the downstream sites will be metered. The Proposer advised that there will be intersystem off take meters. They also noted that under IGT176, Supply Points downstream of the NTS will be considered non-standard sites and will need to be Class 1. The Proposer shared the Xoserve Non-Standard Sites administrative process Shipper Guide showing how NTS exit works for a Shipper and noted that there is a similar guide for NGT too.

The Chair asked why NGT are wanting the sites downstream of this connection to be non-standard sites, as the IGT UNC are having to introduce a new type of switching service for these sites as they are non-CSS. They noted that a decision was made at some point that it is better to put the telemetry on the

individual sites downstream without knowing the quantity of those sites, rather than putting the telemetry in at the IGT-NTS boundary. It would be useful to understand why and how it was concluded that this was the best way forward.

The Proposer provided a general overview of some of UNC TPD G6, which sets out the current non-CSS requirements. They advised that the IGT network connected to the NTS will need to be maintained at the NTS pressure. The Chair felt that this was a reasonable explanation and that it was helpful to understand that anything connected to the NTS will be at a high pressure.

The Chair asked the Proposer how likely it might be that the non-standard switching might be used. They also asked the CDSP representative what the current population of non-standard sites currently is. The CDSP advised that they were unsure of the current number but would take that away and confirm ahead of the next meeting.

The Proposer advised that NGT do publish a report that sets out the number of directly connected sites. Based on the current transmission charging statement, there over a hundred NTS to DN connected sites with a few dozen individually name sites.

Legal Drafting

The Chair asked if the Proposer intents to do the legal drafting, to which they responded and confirmed that they do plan on doing the legal drafting and have provided an initial draft ahead of this meeting to the Code Administrator who has written the drafting into the usual template and format.

The Proposer took the Workgroup through the current version of the legal drafting. The Code Administrator provided an overview of the approach taken by the Proposer, noting that they have elected to update existing definitions, add in required new definitions as well as lift and shift some UNC text into the new proposed Part R rather than cross referencing. They added that the Proposer has also chosen to keep the numbering as close the UNC as possible which is why there may be references within paragraphs that note “not in use”.

The Proposer stepped through their drafted changes, advising first that they had missed off a required provision relating to TPD Section G6 but that this will be added into the next iteration of the drafting.

The Chair referenced the current drafting approach taken by the Proposer and noted that if NGT wanted to change the requirements under the UNC in future, those changes would not be reflected in the IGT UNC as NGT cannot raise changes in the IGT UNC. The Proposer asked whether any changes needed to IGT UNC would be added to the list of required change. The Code Administrator advised that it would be something that would be tracked and would go under the list of UNC Modifications needing action. However, the Code Administrator cannot appoint someone to raise a Modification and NGT cannot raise changes under the IGT UNC and so there is a risk of a misalignment as we will have to rely on an IGT UNC party to raise any required Modification(s).

The Chair asked if any NExA will be required to follow the template as set out in the drafting. The Proposer advised that it will but noted that it is very high level and very open set of provisions. It’s the same concept as Part Q that was introduced under IGT172. The template will be given to the potential connected consumer and the DN will approach them and agree the NExA based on the template, but the specifics go into that agreement and operate outside of code. They noted, for example that the pressure is simply added to that document as required under Code. However, TPD Section J says simply says what the process is for changing the pressure and how that should be dealt with. That does not change the agreement itself, and they would expect NGT would contact any IGT regarding any impacts to request that IGT pick these up.

The Chair suggested that this approach implies that the IGT should be adhering to it under the UNC so and there is a question of how IGTs are going to be able to advocate for themselves. The Proposer referenced IGTAD Section D and advised that it says that IGTs shall adopt, by means of the IGT UNC, to implement the rules and processes which are the same as those from time to time of the TPD. The UNC0887 proposer has used the existing vehicle in the IGTAD to ensure that the Codes remain aligned.

The Code Administrator advised that there are a significant number of changes in the IGTAD. They noted that the Code Administrator has gone through the changes from a consequential impacts perspective, there is nothing specific at the moment that needs to be amended. However, they will complete a full review to ensure that there are no numbering or reference changes outside of what IGT176 is proposing as we might need to include some additional updates to accommodate the UNC0887 changes to existing text.

The Chair asked if the whole of IGTAD can now apply to NGT or not. The Code Administrator advised that the UNC0887 does a good job at splitting things out and ringfencing provisions that do / do not need to apply to NGT.

The Code Administrator recommended that IGTs/ Shippers should review the UNC0887 drafting to ensure that it fits for your business regardless of IGT176. The Proposer advised that the UNC0887 proposer took great lengths to ensure that there were no unintended consequences.

Workgroup Discussions (June 2025)

Differences between direct NTS connections vs GDN connections

A member asked for clarification regarding how the obligations for IGTs connecting to the NTS differ compared to what is currently required of GDNs.

The Code Administrator reiterated discussions from last month and also advised that it is the Proposer's intent to keep the obligations the same for IGTs as they are for GDNs when it comes to NTS connections. The Proposer provided some historical context, nothing that connections to the NTS have been available under the Network Code regimen since it was introduced. However, the IGT UNC has not allowed it from a Code perspective and the IGTAD, prior to UNC0887 has only been relevant to Large Transporters and IGTS. However, post IGT176 and UNC0887, NGT will fall under the Large Transporter definition with regards to IGT networks connected to the NTS and will make the IGT process the same as the established process for GDNs. The member thanked the proposer and advised that it was useful context.

The Chair asked for confirmation of may vary between an IGT-NTS and IGT-GDN connection. The NGT representative advised that the provisions under UNC0887 will supplement the IGT-GDN connections process with what is needed between the relevant IGT and the NTS and establish exit provisions for IGT-NTS connections. At the moment they cannot clarify the full extent of a NExA agreement, but it will include terms for offtake.

The Chair asked NGT if, where a GDN to IGT connect would have a metered point, the NTS to IGT connection will not have a metered point. The NGT representative agreed with this view.

Legal drafting

The Proposer took the Workgroup through the updated legal drafting:

- **Part CI 8** – A member advised that the reference to (i) was not necessary, the Proposer agreed with this view.
- **Part CI 19** – updates to proposed changes to note the updates discussed in the last meeting and to also added in a cross reference to Part R.
- **Part CI 23** – new paragraph to introduce necessary reference to TPD Section G6. This takes the non-CSS provisions and replicates it as near as possible to what is currently required under TPD. This section is used for Supply Point transactions for NTS exit. They noted that there is a large amount of content in TPD largely because there are certain complexities from legacy activities that are not an issue for IGTs, which is why there are a number of "shall not apply" instances.

  Xoserve noted the updates and that they agreed with the principle of what is being done, and the fact that this section applies to non-CSS and NTS Supply Point Offtake arrangements. They asked for confirmation of the rationale behind the referencing, specifically whether it is only because UNC0887 stipulates that these Supply Points need to be considered non-CSS NTS Supply Points, and not for any other purpose.

  The Proposer confirmed that they have worded the drafting to focused on the non-CSS Supply Administration elements only. Therefore, they have excluded the areas not needed, using shared Supply Points as and example.

  The Code Administrator asked whether shared Supply Points may be needed in the future, and whether there may be any interest in this. Xoserve agreed that it was better to exclude things like shared Supply Points for now, noting that if IGTs wanted this in the future it could be added in under a separate Modification. The Proposer agreed with this view, advising that they see this as a legacy activate, using the electricity industry as an example. The NGT representative noted that shared Supply Points were more about parties sharing the risks associated with very large sites. It meant that more than one Pipeline User could be registered. The IGT UNC currently allows for only one user within the Code, so unless you also seek to modify that, then it is already excluded. They noted that these are very large consumer sites and unless you have a very large power station connection via an IGT there may never be a need. The Code Administrator suggested that the drafting may be better left as is, and future Modifications could be raised to include things like shared Supply Points if there was a desire for it.
- **Part N 1.2** – The Proposer noted the addition of National Gas Transmission, to ensure it is included in decisions related to Large Transporter.
- **Part R 1.1** – The Proposer noted the introduction of the word "only" to further ringfence the provisions within this section to NTS related connections and Supply Points.
- **Part R 1.2** – The Proposer noted the change to "Registered User" rather than "Pipeline User", siting the currently TPD Section J term as rationale.

  A member raised concerns regarding the use of the term Relevant User in the IGT UNC in place of Registered User. They noted that Registered User and Relevant User are used differently in the UNC and can denote different users in different circumstances. They asked why Registered User isn't used. The Proposer advised that the legal drafting is a lift from the relevant section of TPD, which uses the same wording for the same process.

The member asked if there is a possibility of anything details in Part R causing an issue with a Relevant User as a direct replacement for Registered User. They used the NExA as and example whereby a Shipper may not be able to agree the NExA as they are not down as the registered used yet.

TL shared TPD Section J with the Workgroup, and the Proposer stepped through the relevant areas that had been lifted and put into the IGT UNC legal drafting. The Proposer paid particular attention to Section J, 1.2.4 which states that (a) Relevant User means Registered User in relation to a Supply Meter Point or Supply Point in Section J. The Proposer added that they had omitted the bit relating to a Supply Point or Supply Meter Point as the proposed IGT UNC Part R only applies to Supply Points. The member and NGT considered the rationale and agreed that the usage of Relevant User is fine as the Proposer had limited the application and the matter was concluded.

- **Part R 3.10.2** – The Proposer provided an overview of the changes made regarding the maximum permitted rate for exit capacity for an IGT-NTS connection. They confirmed that they had lifted text from TPD Section J, 3.10.2 (b). The Chair asked whether parties obligated to with regards to exit capacity will have what they need to know and understand it.

  The NGT representative advised that, under UNC0887, the Registered Pipeline User will be incentivised to book exit capacity and that this figure will be calculated and divided by 24 to set the actual maximum rate per hour. The Chair responded asking if the IGT needs to have an agreement with the NTS on the maximum capacity, and if the IGT is then expected to manage all of the individual Supply Points on their network to ensure that capacity is not breached. The Proposer advised that the Shipper has to be aware of the NExA in pale and ensure that they can comply with it. Therefore, they must ensure that maximum capacity is not breached. The Chair aske how they will know as they will not be aware of what's going on for the entirely of the network. It will be the responsibility of the IGT to monitor and make the Shipper aware. The NGT representative added that the Registered User will know the figures as they are responsible for capacity and booking this via Gemini. The Chair responded that the maximum capacity must be calculatable by the IGT UNC parties to avoid any breaches. The NGT representative clarified that TPD Section J, 3.10.2 refers to a singular Pipeline User at a singular Supply Point, not the notional connection Point. NGT and the Proposer discussed the current obligations of IGTs making gas available for offtake and how these are impacted by the proposed paragraph 3.10.2 in the new Part R. The Proposer and NGT took an action to further investigate and provide an update at the next Workgroup meeting.

The Code Administrator confirmed that an updated version of the legal drafting would be provided ahead of the next Workgroup meeting.

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Subheadind

Insert Text Here

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.

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Insert text here

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 **Proposer's Rationale** 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 **Proposer's Rationale** No change as the additional sources of gas would not be material in volume.	None
Reduced environmental damage **Proposer's Rationale** 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	Positive

allowing Pipeline Operators to provide this facility.	
Improved quality of service **Proposer's Rationale** No change identified.	None
Benefits for society as a whole **Proposer's Rationale** 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

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Insert text here

Cross-Code Impacts

Proposer's views

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	☐

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Insert text here

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.

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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

Proposer's view

(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.

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Insert text here

8 Implementation

Implementation Approach

[Code Administrator suggests that this Modification be implemented at the same time as UNC0887. They also suggest that this Modification should only be implemented if UNC0887 is implemented.]

Proposer's 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.

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Insert text here

9 Legal Text

Approach

Draft legal text changes is being developed as part of this Modifications progression. The latest version can be found on the IGT176 webpage here.

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Insert text here

10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup recommends to the Panel that:

- [this Authority Decision Modification should proceed to consultation.]