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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

CCS001 – CLARIFICATION OF CO2 VENTING BETWEEN METERING POINT AND DELIVERY POINT

On 7 August the Code Secretary issued a consultation to industry to seek feedback on the Modification Report for CCS001.

The purpose of this document is to consolidate the responses and for the Code Secretary to answer any questions raised within those responses.

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Question 1:	Please state whether you are in support of this Modification or if there are any issues that you believe should be considered	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Net Zero North Sea Storage Limited (T&SCo)	Yes – no additions issues should be considered beyond the minor corrections identified in the legal text.	-
EET Hydrogen (HPP1) Ltd (Third Party Participant)	The overall principle of allowing a Downstream Venting Event is agreed by EETH, subject to a few changes to the proposed legal text as included below.	-
Castle Cement Limited (Non-Designated Party)	Castle Cement Limited support this modification. It is a need irrespective of the proximity of the flowmeter and the T&S co delivery point.	-

Question 2:	How would implementation of this modification impact the relevant objectives?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Net Zero North Sea Storage Limited (T&SCo)	The primary impact would be a positive impact to the safe, economic, efficient and effective operation of the T&S Network, as this will provide users with an effective and efficient means to become and proof that they are compliant prior to restarting, as well as helping carry out maintenance on the delivery point in a safe fashion.	-

EET Hydrogen (HPP1) Ltd (Third Party Participant)	As stated in Appendix A, the implementation of CCS 001 modification aims to prevent the delivery of Non-Compliant CO2 to the T&S Network, avoid damages to the Network and ensure the safe operations, as well as enable the performance of maintenance and inspection activities.	-
Castle Cement Limited (Non-Designated Party)	Castle Cement Limited agree with the proposer's assessment of impact on relevant objectives.	-

Question 3:	What development and ongoing costs would you face if this modification was implemented?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Net Zero North Sea Storage Limited (T&SCo)	Limited to no additional costs for T&SCo's.	-
EET Hydrogen (HPP1) Ltd (Third Party Participant)	Minimal impact in design and construction of the pipework by Users between Metering Point and Delivery Point.	-
Castle Cement Limited (Non-Designated Party)	No development or additional ongoing costs as the requirements have already been included in the process design.	-

Question 4:	What future impacts could this modification have on Parties to this Network Code?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**

Net Zero North Sea Storage Limited (T&SCo)	Limited additional beyond those already identified for existing T&SCo's and Users in the impact assessments.	-
EET Hydrogen (HPP1) Ltd (Third Party Participant)	Whilst we consider the risk to the T&S Network is very small, the modification will have a positive impact, as it will allow Users and T&SCos to prevent potential Non-Compliant CO2 being delivered to the Network. This may avoid Network damage and disconnecting Users from the Network for inspection, repairs and maintenance. Without the change, and with the T&SCo not permitting small amounts of Non-Compliant CO2 entering the T&S Network, it is necessary to allow the User to reconnect to the T&S Network after a specification exceedance event without breaching the Code.	-
Castle Cement Limited (Non-Designated Party)	It provides certainty around venting for new users.	-

Question 5:	What lead time would you wish to see prior to this modification being implemented, and why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Net Zero North Sea Storage Limited (T&SCo)	Support the need for fast-tracked implementation as requested by the proposer.	-
EET Hydrogen (HPP1) Ltd (Third Party Participant)	To support Users finalize their detailed design and EPC agreements and avoid any delays in the Users FID, this modification should proceed expeditiously and target implementing the	-

	outcome of this consultation before November 2025.	
Castle Cement Limited (Non-Designated Party)	No lead time is required.	-

Question 6:	Are you satisfied that the legal text will deliver the intent of the modification?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Net Zero North Sea Storage Limited (T&SCo)	Yes with the following minor exceptions: - there appears to be an introductory sentence missing in paragraph 10.13, before the subheadings a) and b). - The reference to paragraph 10.16 of Section F in paragraph 27.2 of Section H is incorrect – this should be paragraph 10.15. - The reference to paragraph 10.16 of Section F in paragraph 5.6 of Annexure L is incorrect – this should be paragraph 10.15	See comments below in Q9
EET Hydrogen (HPP1) Ltd (Third Party Participant)	The legal text attached to this consultation needs some amendments to satisfy EETH and support the implementation of the modification.	
Castle Cement Limited (Non-Designated Party)	Yes	

Question 7:	Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Net Zero North Sea Storage Limited (T&SCo)	Agree with the proposal for this to be regulator-determined.	-
EET Hydrogen (HPP1) Ltd (Third Party Participant)	This should not be a self-governed modification as this clarification is necessary to mitigate the material effect on Users of reconnecting to the Network after a non-compliance event.	-
Castle Cement Limited (Non-Designated Party)	Yes	-

Question 8:	The Legal Text proposes introducing a requirement upon T&SCO's to notify the Vented Quantity to the CDS within two Business Days of receipt of it from the User. Do you believe two Business Days is an sufficient amount of time for T&SCO's to notify the CDS of the Vented Quantity? Please provide your rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Net Zero North Sea Storage Limited (T&SCo)	This seems sufficient and is consistent with providing the result of a flow meter adjustment to the CDS in paragraph 13.3 of Section F.	-
EET Hydrogen (HPP1) Ltd (Third Party Participant)	T&S Co to comment on this.	-
Castle Cement Limited (Non-Designated Party)	Castle Cement Limited are content that this is achievable, but two business days seems unnecessarily short particularly when the vented	See comments below in Q9

	volumes are very small compared to the total CO2 flow.	

Question 9:	Is there anything further you wish to be taken into account?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Net Zero North Sea Storage Limited (T&SCo)	There are some inaccuracies / minor issues in the modification report: • The statement on ETS liability in the proposed solution is not correct. The T&SCO retains the ETS liability for this equipment, though the user will need to reimburse the T&SCo. • In the relevant objectives, more detail could be provided on what the specific T&SCo obligations are relating to prudent operation of the network. • The relevant objectives have not been updated to reflect the commentary from workgroup. • The impact assessment has not been updated to reflect the comments in the workgroup, particularly that the main impact will be on users and will be positive, in that this provides them with a mechanism to be compliant with the entry	Thank you for these comments, amendments have been made where the Secretary believes it is beneficial for the Modification Report.

	specification, as opposed to preventing non-compliance. There is also a positive impact on T&SCos for faster restarting of operations, leading to an increase in stored carbon. • The second bullet points for the T&SCo and User Impact assessments appear to be generic statements taken from the template. • In the alternative proposal section, there is no description of why the alternative proposal from DESNZ was taken as the primary proposal. • The commentary around the direction from the regulator in section 4 is not correct. It is NEP's understanding that this was not a formal direction from the regulator, as such it would be more appropriate to state that a code modification was deemed the most appropriate approach after considering other options.	
EET Hydrogen (HPP1) Ltd (Third Party Participant)	Yes, please see below amendments to the proposed legal text. Note: insertions in bold, deletions struck through <u>Section F</u>	The legal text has been updated to v1.1 and the comments below show what as been included:

	10.12 (c) there is a superfluous 'to' after 'vent' in the second line. 10.12 b) and d) the drafting "*owned by the User*" should be removed as the Non-Compliant CO2 will also be in the pipeline infrastructure owned by T&SCo. The Delivery Point is upstream of the T&S Co's isolation valve. *(b) at the time when the User is required to commence any procedures to cease delivery of Non-Compliant CO2 (whether in whole or in part, as the case may be), there* *is Non-Compliant CO2 in the pipeline infrastructure ~~owned by the User~~ between the Metering Point and the Delivery Point; and* *Or* *(d) the User needs to remove carbon dioxide from the pipeline infrastructure ~~owned by the User~~ between the* *Metering Point and the Delivery Point for the purpose of routine or emergency maintenance,*	This has been removed in v1.1 of the legal text The "owned by the User" text has been removed

	10.12 d) missing a closing bracket “)” after *“(referred to here as Downstream Venting Event”*. 10.12 (e) and (f) should be indented further as subparagraphs of the previous paragraph rather than continuation of the same list. 10.13 should read ***The User must:*** *a) only …* *b) design ….* *10.14 a) ii) the User is able to recommence delivery of carbon dioxide ~~that is compliant~~* ***in compliance*** *with the Entry Provisions;* 10.14 c) The time period required for User to prepare such statement seems onerous when we have not yet determined or agreed the Isolation Procedure. EETH suggest increasing this timing requirement to match the timing for T&SCo to provide information stated in 10.15. *10.14 c) as soon as reasonably practicable and in any event no later than ~~twenty-four~~*	The bracket has been added. These two sub-clauses have been indented and renumbered (i) and (ii) This text has been amended with "Where a User has a Downstream Vent, the User must:" This text has been amended This amendment has not been made as the Proposer wants it to remain as 24 hours.

	forty-eight *(~~24~~ 48) hours after the end of the Downstream Venting Event, provide to the T&SCo:* 10.14 d) As the information will be determined by the T&SCo, it could be onerous as Users don't know what they will require and the timeline is unknown. We have inserted 'reasonably' required but it would be useful to understand what would be 'reasonably required'. Also included drafting so that it is clear that these requirements are in accordance with the Annexure H Isolation Procedure and not paragraphs above. *10.14 d) provide to the T&SCo all information* ***reasonably*** *required by the T&SCo to enable the T&SCo to:* *i) comply with its obligations under the ETS Legislation and Guidance; and* *ii) determine the ETS Liabilities, with respect to the carbon dioxide that has been vented*	This text has been amended to "10.14 d) provide to the T&SCo all information **reasonably** required **(in accordance with the Isolation Procedure)** by the T&SCo to enable the T&SCo to: "

	in accordance with the Terms of Reference of the Isolation Procedure for a Downstream Venting Event in Annexure H *Section H 27.2* Incorrect reference, 10.16 should be replaced by 10.14 *Where the T&SCo has notified a Vented Quantity to the CDS pursuant to paragraph* ***10.14*** *of Section F (Network Design and Specification),* <u>Section J</u> 4.7 Alternative drafting suggestion Where ***e) there has been a Downstream Venting Event in accordance with the provisions of paragraph 10.12 of Section F, and a T&SCo ETS Liability arises as a result of the Downstream Venting Event,*** *such User shall be liable to compensate the T&SCo for all costs associated with such ETS Liabilities.*	This reference has been amended to 10.15 The Proposer believes that the legal text suggested here and the current proposed legal text have the same intent and therefore this has not been changed as the proposed legal text has been consulted on.

	Annexure H – Isolation Procedure ToR 1. h) needs to be redrafted to include the exception of the Downstream Venting Event. Suggest the following drafting: *h) **except in the case of a Downstream Venting Event,** not require Users to take delivery of carbon dioxide from the T&S Network or vent or purge carbon dioxide that has passed through the Delivery Point and entered the T&S Network;* Seems incomplete, suggest including drafting like in other procedures *Downstream Venting Events* ***i) detail the responsibilities of T&SCo and User(s) relating to isolation in the case of a Downstream Venting Event and*** *j) set out:* *(i) a method that is compliant with ETS Legislation and Guidance for obtaining the Vented Quantity; and*	This change has not been made. This is not permitted by the wider regulations and neither is it permitted by the ETS therefore it was believed to be unnecessary. This change has not been made. This is not permitted by the wider regulations and neither is it permitted by the ETS therefore it was believed to be unnecessary.

	(ii) any data reporting requirements associated with this method.	
Castle Cement Limited (Non-Designated Party)	No	-