













UNC Request	At what stage is this document in the process?
<h1>UNC 0670R:</h1> <h2>Review of the charging methodology to avoid the inefficient bypass of the NTS</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block; background-color: #f0f0f0;">01 Request</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block; background-color: #4a90e2; color: white;">02 Workgroup Report</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block; background-color: #fff9c4;">03 Final Modification Report</div> </div>
<p>Purpose of Request:</p> <p>To conduct a review and assessment of the charging methodology that is a feature of the overall Gas Transportation Charging framework to avoid the inefficient bypass of the NTS (currently the NTS Optional Commodity charge). This review would assess the objectives, identify requirements, analyse potential options and propose an enduring proportionate solution.</p>	
	<p>The Workgroup recommends that the Panel now consider this report.</p>
	<p>High Impact: All parties that pay NTS Transportation Charges and / or have a connection to the NTS, and National Grid NTS</p>
	<p>Medium Impact: N/A</p>
	<p>Low Impact: N/A</p>

Commented [RH1]: Workgroup to review whether this is still accurate

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4	Modification(s) Error! Bookmark not defined. Error! Bookmark not defined.	enquiries@gasgovernance.co.uk
5	Recommendation	1645159
About this document		 0121 288 2107
<p>This report will be presented to the panel on 15 August 2019.</p> <p>The Panel will consider whether to agree with Workgroup that</p> <ul style="list-style-type: none"> Request 0670R should be returned to Workgroup 0670R for further assessment and A Workgroup Report should be submitted for consideration at the October 2019 Panel. 		<p>Proposer:</p> <p>Daniel Hisgett</p> <p> Daniel.Hisgett@nationalgrid.com</p> <p> 01926 653634 or 07583 060099 or 07971500855</p> <p>Transporter:</p> <p>Colin Williams</p> <p> colin.williams@nationalgrid.com</p> <p> 01926 655916 or 07785451 776</p> <p>Systems Provider:</p> <p>Xoserve</p> <p> commercial.enquiries@xoserve.com</p> <p> telephone</p>

Commented [RH4]: Check with Dan Hisgett that he is happy to propose

Commented [RH5]: Need Dan Hisgett contact details

Commented [RH2]: Modify as needed

Commented [RH3]: This may need to be rewritten in line with whatever Workgroup decides on 30 July 2019

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Commented [RH6]: Steve Pownall to supply phone number if possible

1 Request Summary

Request Update July 2019

The following paragraph is designed to update the reader as to what has happened in the time 0670R has been under consideration.

Request 0670R was raised on 08 October 2018. At that time Modification 0621 - *Amendments to the Gas Transmission Charging Regime* and its alternatives were with Ofgem awaiting a decision on implementation. The Request was made in light of this. On 20 December 2018 Ofgem issued a Decision Letter¹ outlining its decision to reject implementation of the modification and all of its alternatives. Soon after, on 17 January 2019 National Grid NTS raised Urgent Modification 0678 - *Amendments to Gas Transmission Charging Regime* and thereafter 10 alternatives were raised. The Final Modification Report was sent to Ofgem for consideration on 29 May 2019. As at 23 July 2019 there has been no decision on whether Ofgem will implement one of the 0678 Modifications, if any.

Ofgem gave the following indication to the UNC Modification Panel on 18 July 2019:

“... it was unlikely that a decision would be made by 01 August 2019, given the steps which are likely to be carried out in order to do so. Ofgem confirmed that consultants are being appointed to support the analysis to go into the impact assessment. He further clarified that Ofgem had not yet completely finished the procurement process for these external consultants.

Alongside the work to develop the impact assessment, Ofgem is considering the TAR NC compliance of the submitted Modifications. Based on this work Ofgem may, if appropriate, consult on a 'minded to' decision or other appropriate output.

Panel Members noted that the process should not be rushed given the scale of the impact.

Panel Members requested a timetable for the decision making process and a progress update at Panel from Ofgem each month going forward until a decision is made.

LK recognised the importance of the issue to industry and agreed to give an offline update to Panel on progress.”

Why is the Request being made?

The NTS Optional Commodity Charge product was introduced in 1998 to avoid inefficient bypass of the National Transmission System (NTS) by large sites located near to entry terminals. The charge is an alternative to investment, so the formula to calculate individual rates is derived from an estimated cost of laying and operating a dedicated pipeline of NTS specification. Shippers can currently elect to pay the NTS Optional Commodity Charge as an alternative to the NTS System Operator (SO) and Transmission Operator (TO), Entry and Exit Commodity Charges.

Due to changing behaviours, the NTS Optional Commodity Charge (also referred to as “Short-haul”), has seen a significant increase in its use which has impacted on other charges in a way that was not originally envisaged. As a result, it could be applied in situations that are considered inconsistent with its original purpose.

¹ All material relating to Modification 0621 can be found here:

<http://www.gasgovernance.co.uk/0621>

Taking on learning from recent Modifications 0636, 0653 and 0621, National Grid, as Proposer of Request Modification 0670R, recognises the benefit of considering this aspect of charging as part of a separate review. More importantly **it should be considered as an integral part of an overall methodology and not in isolation, prior to a solution being proposed.** It is considered that returning to the principles of the product will help to facilitate an industry consensus before a solution is raised, thereby helping to reduce the risk of multiple alternatives, saving time and helping to progress with the implementation of a Modification, if required.

The purpose of this Request therefore, is to conduct a review and assessment of the charging methodology that is a feature of the overall Gas Transportation Charging framework to avoid inefficient bypass of the NTS. This review would consider:

- The objectives;
- Identify requirements and scope;
- Identify principles on which to base any solution;
- Analyse potential options (including ideas already explored e.g. elements proposed under 0636/A/B/C/D and 0653); and
- **Propose an enduring proportionate solution within the charging framework.**

Commented [RH7]: As this aspect of the review is not yet completed, it could be argued that the Review Workgroup should not close yet.

This review is considered necessary and should be performed, regardless of the outcomes of other related UNC Modifications, due to the time required for the review and potential implementation timescales. Modification 0621 - *Amendments to the Gas Transmission Charging Regime* and its alternatives are in progress and in most proposed solutions, a charge is retained that discourages inefficient bypass of the NTS. This retained charge has been developed under the supported notion that this is a topic that should be reviewed separately to give it appropriate time for examination, with most alternative proposals having no optional charge after the transitional period (as of October 2021) and most industry parties supporting a separate review to put in place a suitable charging structure for this from 2021. There is an expectation that arrangements from 2021 should be reviewed as part of a dedicated review group.

This proposal is to review the method by which the avoidance of inefficient bypass is managed, as part of the NTS Transportation Charging Framework. This review allows time and focus to consider whether and how the charging proposals for discouraging inefficient bypass should be catered for within any Gas Transportation Charges, including the objectives of any such arrangement that it should be measured against. It is hoped that participants will begin the review looking at the principles first, rather than trying to refashion any existing potential solution options. The assessment of these objectives and principles will determine the full scope of the review.

Scope

The purpose of this Request is to create a Workgroup to conduct a review and assessment of the charging methodology that is used to avoid the inefficient bypass of the NTS as a feature of the overall charging framework.

This review would assess the objectives of the charging arrangements that discourage inefficient bypass of the NTS and identify the most effective way to incorporate these into the Transportation Charging framework. In addition to reviewing the objectives of any such arrangement, the process is suggested to identify requirements, then analyse and propose potential enduring solutions within the charging framework. This can be carried out independent from, and with an awareness of, UNC Modifications that are currently awaiting decisions, to provide enough time for implementation. The level

Joint Office of Gas Transporters

of detail of any considered options will be part of the workgroup discussions, to ensure this is appropriate, given that 0621 may not be decided upon until 2019.

UNC0621 and its alternatives are currently subject to Ofgem decision. This review can determine ways in which it is most efficient to manage the incentive, through the overall charging arrangements, to avoid bypass and use the NTS. The target of this review and likely Modification (post awareness of UNC0621 decision) would be for implementation for October 2021 charges.

The Workgroup will address consequential changes to UNC derived from the review, including any potential minded to positions that may come from Ofgem's impact assessment, and evaluate the impacts from the proposed solution(s). Compliance with EU Tariff Code (Regulation 2017/460) will be a feature of the discussions. The timelines for any potential change will be part of the discussions.

Impacts & Costs

Costs associated with the Request Proposal are currently unknown.

Impact and cost depend on the nature of the proposed solution, if any.

Recommendations

The Request aims to create a Workgroup to conduct a review and assessment of the charging methodology that is used to avoid the inefficient bypass of the NTS (currently the NTS Optional Commodity charge) as part of the overall Gas Transportation Charging framework. This review would assess the objectives, identify requirements, identify principles on which to base any solution; analyse potential options and propose an enduring proportionate solution.

The Proposer considers the proposal should be issued to a Workgroup in order to conduct a holistic review, prior to determining any solution and identify an enduring solution to be taken forward as a future Modification.

Additional Information

Links to relevant charging Modifications that have been discussed recently:

[0678/A/B/C/D/E/F/G/H/I/J \(Urgent\) - Amendments to Gas Transmission Charging Regime](#)

<https://www.gasgovernance.co.uk/0678/>

0621/A/B/C/D/E/F/G/H/J/K/L - Amendments to Gas Transmission Charging Regime

<https://www.gasgovernance.co.uk/0621/>

0636/A/B/C/D - Updating the parameters for the NTS Optional Commodity Charge

<https://www.gasgovernance.co.uk/0636/>

0653 - Updating the parameters for the NTS Optional Commodity Charge – Introducing the NTS Optional Capacity Charge

<https://www.gasgovernance.co.uk/0653/>

Field Code Changed

2 Impacts and Costs

Consideration of Wider Industry Impacts

There is the potential for wider industry impacts; the areas affected and scale are dependent on the solution identified as part of this Request and may also be influenced by other code modifications and

developments. The extent of any potential impact will be considered alongside the development in the review.

Impacts

Impact on Central Systems and Process	
Central System/Process	Potential impact
UK Link	<ul style="list-style-type: none"> Not yet known
Operational Processes	<ul style="list-style-type: none"> Not yet known

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> Not yet known
Development, capital and operating costs	<ul style="list-style-type: none"> Not yet known
Contractual risks	<ul style="list-style-type: none"> Not yet known
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> Not yet known

Impact on Transporters	
Area of Transporters' business	Potential impact
System operation	<ul style="list-style-type: none"> Not yet known
Development, capital and operating costs	<ul style="list-style-type: none"> Not yet known
Recovery of costs	<ul style="list-style-type: none"> Not yet known
Price regulation	<ul style="list-style-type: none"> Not yet known
Contractual risks	<ul style="list-style-type: none"> Not yet known
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> Not yet known
Standards of service	<ul style="list-style-type: none"> Not yet known

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	<ul style="list-style-type: none"> Impact is unlikely
UNC Committees	<ul style="list-style-type: none"> Impact is unlikely
General administration	<ul style="list-style-type: none"> This request is likely to be a significant piece of work for the Joint Office to support and manage
DSC Committees	<ul style="list-style-type: none"> Not yet known

Impact on Code	
Code section	Impacted
UNC TBD Section Y and UNC TBD Section B.	<ul style="list-style-type: none"> Impacted

Impact on UNC Related Documents and Other Referenced Documents	
Related Document	Potential impact
Network Entry Agreement (TPD I1.3)	<ul style="list-style-type: none"> Not yet known
General	Potential Impact
Legal Text Guidance Document	<ul style="list-style-type: none"> Impact is unlikely
UNC Modification Proposals – Guidance for Proposers	<ul style="list-style-type: none"> Impact is unlikely
Self Governance Guidance	<ul style="list-style-type: none"> Impact is unlikely
TPD	Potential Impact
Network Code Operations Reporting Manual (TPD V12)	<ul style="list-style-type: none"> Not yet known
UNC Data Dictionary	<ul style="list-style-type: none"> Not yet known
AQ Validation Rules (TPD V12)	<ul style="list-style-type: none"> Not yet known
AUGE Framework Document	<ul style="list-style-type: none"> Not yet known
Customer Settlement Error Claims Process	<ul style="list-style-type: none"> Not yet known
Demand Estimation Methodology	<ul style="list-style-type: none"> Not yet known
Energy Balancing Credit Rules (TPD X2.1)	<ul style="list-style-type: none"> Not yet known
Energy Settlement Performance Assurance Regime	<ul style="list-style-type: none"> Not yet known
Guidelines to optimise the use of AQ amendment system capacity	<ul style="list-style-type: none"> Not yet known
Guidelines for Sub-Deduct Arrangements (Prime and Sub-deduct Meter Points)	<ul style="list-style-type: none"> Not yet known
LDZ Shrinkage Adjustment Methodology	<ul style="list-style-type: none"> No impact
Performance Assurance Report Register	<ul style="list-style-type: none"> No impact
Shares Supply Meter Points Guide and Procedures	<ul style="list-style-type: none"> No impact
Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and	<ul style="list-style-type: none"> No impact

Impact on UNC Related Documents and Other Referenced Documents	
Local Gas Supply Emergency	
Standards of Service Query Management Operational Guidelines	<ul style="list-style-type: none"> No impact
Network Code Validation Rules	<ul style="list-style-type: none"> No impact
	<ul style="list-style-type: none">
OAD	Potential Impact
Measurement Error Notification Guidelines (TPD V12)	<ul style="list-style-type: none"> No impact
	<ul style="list-style-type: none">
EID	Potential Impact
Moffat Designated Arrangements	<ul style="list-style-type: none"> Not yet known
IGTAD	Potential Impact
	<ul style="list-style-type: none"> Not yet known
DSC / CDSP	Potential Impact
Change Management Procedures	<ul style="list-style-type: none"> Not yet known
Contract Management Procedures	<ul style="list-style-type: none"> Not yet known
Credit Policy	<ul style="list-style-type: none"> Not yet known
Credit Rules	<ul style="list-style-type: none"> Not yet known
UK Link Manual	<ul style="list-style-type: none"> Not yet known
	<ul style="list-style-type: none">

Impact on Core Industry Documents and other documents	
Document	Potential impact
Safety Case or other document under Gas Safety (Management) Regulations	<ul style="list-style-type: none"> Impact is unlikely
Gas Transporter Licence	<ul style="list-style-type: none"> Impact is unlikely

Other Impacts	
Item impacted	Potential impact
Security of Supply	<ul style="list-style-type: none"> Not yet known
Operation of the Total System	<ul style="list-style-type: none"> Not yet known
Industry fragmentation	<ul style="list-style-type: none"> Not yet known

Terminal operators, consumers, connected system operators, suppliers, producers and other non code parties	<ul style="list-style-type: none">• Not yet known
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3 Terms of Reference

Background

To conduct a review and assessment of the charging methodology that is a feature of the overall Gas Transportation Charging framework to avoid the inefficient bypass of the NTS (currently the NTS Optional Commodity Charge). This review would assess the objectives, identify requirements, identify principles on which to base any solution, analyse potential options and propose an enduring proportionate solution.

Topics for Discussion

- Understanding the objectives
- Understand/develop the principles on which to base any solution
- Assessment of alternative means to achieve objective
- Development of Solution (including business rules if appropriate)
- Assessment of potential impacts of the Request
- Assessment of implementation costs of any solution identified during the Request
- Assessment of legal text

Outputs

Produce a Workgroup Report for submission to the Modification Panel, containing the assessment and recommendations of the Workgroup including a draft modification where appropriate.

Composition of Workgroup

The Workgroup is open to any party that wishes to attend or participate.
A Workgroup meeting will be quorate provided at least two Transporter and two User representatives are present.

Meeting Arrangements

Meetings will be administered by the Joint Office and conducted in accordance with the Code Administration Code of Practice.

4 Request Workgroup Assessment

The Workgroup accepted the list of topics for discussion in section 3 above.

Workgroup focused on narrowing the scope of the Review during November and December 2018, whilst examining and agreeing principles on which to build a suitable product during December 2018 and into January 2019. Assessing ideas which might achieve the objective took place also in December 2018 and January 2019.

The Ofgem Decision Letter on Modification 0621 and its alternatives which was issued late in December 2018 gave plenty of information for the Workgroup to discuss. In particular the compliance issues summarised in Slide 9 of the slide pack from National Grid for the 05 February 2019 0670R meeting. (see: <http://www.gasgovernance.co.uk/0670/050219>)

In February 2019 Workgroup 0670R broadly agreed that the objective was to

Avoid inefficient bypass of the NTS.

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The original reasoning of the objective still held true. There is an enduring need despite of or due to future of gas uncertainty. Bypass of the NTS can be considered in a wider context of bypass of the NBP. Inefficient bypass is defined in this context from the existing network perspective. The construction and use of independent pipelines bypassing the NTS risks increased costs as they are spread over a smaller base.

Also in February 2019, Workgroup 0670R broadly agreed that the Core Principles should be:

- Compliant with relevant legislation
- Historical decisions considered
- UNC Charging Relevant Objectives
- UNC Relevant Objectives
- Defined commitment to product
- Cost reflectivity.

Regarding cost reflectivity, two of the topics Workgroup discussed at length without coming to a clear consensus were:

- Difficulty in defining project/pipeline costs (pipeline diameters, distance and flow rate, inflationary cost updates, whether to assume load factor, cost of capital, potential complexity factor as distance increases etc.)
- Difficulty of determining the value of receiving transmission service.

Ideas for a charging methodology to avoid the inefficient bypass of the NTS

National Grid summarised three ideas which Workgroup had discussed:

- Idea 1 - The NTS Optional Capacity Charge as contained in Modification 0653, raised by Centrica.
- Idea 2 - NTS Bypass Avoidance Charge suggested as a capacity discount methodology by National Grid.

- Idea 3 - Cost Reflective Bypass Avoidance Charge, a charge defined by route, suggested by Waters Wye Associates.

The raising of Modification 0678 on 17 January 2019 and its alternatives which followed thereafter meant that efforts to develop shorthaul proposals began to look more to the arena of Modification 0678 to develop these proposals. For example, Modification 0678B which was raised by Centrica on 06 February 2019 contains a shorthaul type product as part of its methodology which resembles Idea 2 above.

The March and April 2019 meetings of 0670R were essentially deferred, due to Workgroup 0678 commitments.

In April 2019 National Grid issued its Optional Charge Analysis document with analysis to support Workgroup 0678 (see: <http://www.gasgovernance.co.uk/0670/300419>). It was intended to provide indicative information regarding the potential impact of any optional charges or lack thereof. Note that Cost of Gas and gas source had been deemed to be out of scope.

Workgroup noted that the following topics for discussion had not been deemed to be appropriate since a draft Modification has not been forthcoming as part of the Review Workgroup:

- Development of Solution (including business rules if appropriate)
- Assessment of potential impacts of the Request
- Assessment of implementation costs of any solution identified during the Request
- Assessment of legal text.

Almost all Workgroup participants had been heavily involved in Workgroup 0678 and contributed to the Final Modification Report 0678 which was submitted to Ofgem on 29 May 2019.

June and July 2019

National Grid suggested Workgroup summarise its work to date by grouping under the following three headings:

- A. New Design
- B. Refinement of option available via those presented in 0678 Alternatives
- C. No bypass product

Some Workgroup participants were uneasy with both A and B, a Workgroup participant summarised the views:

In its 02 July presentation, National Grid set out recommendations for the workgroup report, which included the potential for a “new OCC design” and/or “refinement of option available via those presented in 0678 alternatives”. While it is the case that the Proposers of the OCC alternatives, which include an OCC product, maintain the view that their Proposals are compliant with EU law; better facilitate the relevant charging objectives; and are consistent with the observations set out by Ofgem in its Modification 0621 rejection letter, it would be inappropriate, in the view of the Proposers, for a workgroup to critique a solution which currently sits with Ofgem for a determination. Were this to be permitted, then it would undermine the UNC governance process and effectively extend the UNC consultation process beyond the permitted dates. To this end, a number of Workgroup Participants are concerned

Commented [RH8]: Wording here is from Nick Wye, WatersWye Associates

that National Grid felt it appropriate to air its criticisms-observations of the 0678 proposals in a Workgroup presentation it gave to the 04 June meeting. In short, it is not the role of a Workgroup to pre-judge the outcome of any Modification Proposal nor critique its validity where a Modification is currently with Ofgem for a decision.

Regarding the prospect of no bypass product, a majority of Workgroup Participants felt that from a compliance perspective with TAR NC the product is not necessary/mandatory. There is no provision under TAR NC stating that such a product is required.

It is the view of [several] workgroup participants that ~~However,~~ without an incentive to use the NTS there will be undesirable consequences of fewer Users of the NTS. Thus, there should be a charge or product of some sort that avoided inefficient bypass of the NTS. Workgroup agreed a well-designed product is desirable. Workgroup also noted that Ofgem has urged participants of Request Workgroup 0670R to continue work at pace.

In 30 July workgroup , National Grid clarified that the material and suggestions for Workgroup Report structure was for discussion and understands the points raised. However, as the proposer, it believes that there should discussions and development in this area to provide more timely delivery of any future proposed changes, should they be required. As the proposer of 0670R, National Grid believes it would be remiss not consider future development beyond 0678 and does not believe this undermines the governance of 0678 or 0686 currently with Ofgem for decision as each of these will be considered on the material and impacts present to Ofgem. Considering potential changes in such a manner, discussing in workgroup is an effective and efficient method of UNC development to be better prepared should, on reflection of further developments and updates out of any modification with Ofgem, any further modification be required.

National Grid summarised the work carried out by Workgroup to date as follows (taken from slide 6 of its 06 July 2019 slide pack):

Criteria in considering Inefficient Bypass approach

- Eligibility
- Redistribution of revenue as a consequence
- Existing contracts
- Commitment, and how or if it should be included, and considering the impacts
- Duration and review and product
- How it interacts with other charges

Several Workgroup participants requested that an additional criteria should be added to the top of the list:

- Economic test

A Workgroup participant provided the following view of the requirements of a future shorthaul product:

Any inefficient by-pass product would need to be well defined and suitably cost reflective of the service being provided, fully recognising the risks and commitments associated with self-provision. Compliance with EU regulations is essential and is likely to require a restricted conditional availability of any such product.

Commented [RH9]: Text here from Debra Hawkins TPA Solutions

A further Workgroup participant provided the following view of the requirements of a future shorthaul product:

Commented [RH10]: Text here from Nick Wye WWA

During the examination and development of potential OCC solutions, the majority of workgroup attendees agreed that an OCC product was desirable and necessary (to avoid inefficient bypass) and any future OCC methodology should be cost reflective. To that end, any such methodology should be based, broadly, upon a valuation of the costs to build and maintain a pipeline of equivalent size and length to an OCC route. This approach was adopted by Modification Proposals 0678 D/G/H/J. The cost based approach also formed the basis of Idea 2, proposed to Workgroup 0670R by National Grid and Idea 3, proposed to Workgroup 0670R by WWA in January 2019.

European Proposals

Workgroup requested and National Grid examined and brought back an update on other Member State's Proposals of conditional products. Most were not easy to apply in GB but provided a helpful frame of reference in terms of compliance (especially considering ACER's views) and potential options. For more information see slides 7-10 of the National Grid slide pack for 02 July 2019: <http://www.gasgovernance.co.uk/0670/020719>.

Brexit

The assumption throughout Workgroups was that whatever the outcome of the UK leaving the European Union and whenever that took place, the intent expectation would be to have a similar regulatory regime in place in the UK as could be found in Europe. This can be reviewed and considered further if any changes to the current approach, of full compliance with EU Codes being necessary, were to change.

National Grid began to flesh out some aspects of an alternative shorthaul proposal, for discussion, at the June meeting. At the 02 July meeting possible themes below were analysed in more detail:

- Eligibility criteria that is not a decision based on optional charge vs RPM
- Reflection of transmission services received in any charge levied
- Level of uptake and redistribution impact
- Consideration of who as well as where
- Tiered approach to application and charge

The latter theme was explored in greater depth though Workgroup did not find much of the resulting analysis very useful. National Grid commented that analysis for the workgroup report should only be that of use and, if it helpful to get feedback on the analysis presented for discussion. National Grid also commented that the analysis for produced as a means to facilitate discussion on aspects of development.

Most Workgroup participants only found two aspects of the data useful - in Slide 18 of the slide pack, the far right hand side bar and the far left hand side bar. These show the two extremes of the scenarios presented:

- The far left hand side bar represents a scenario where no NTS Bypass Product exists (the NTS Bypass Product is removed and not replaced). This scenario assumes no users bypass the system and all users pay the Reserve Price.
- The far right hand side bar represents a scenario where no NTS Bypass Product exists (the NTS Bypass Product is removed and not replaced). This scenario assumes all volumes would

be there in setting charges but then choose to not use the NTS. Therefore, it assumes all current NOCC users bypass the system and all IBP revenue is lost from those users.

Regarding Slide 19 some Workgroup participants felt the points made on slide 19 covering the 0678 Modifications with Ofgem were not helpful. On Slide 21 some Workgroup participants felt the word refinement should be removed. Some Workgroup participants took exception to the word redistribution.

Most Workgroup participants considered that it was appropriate to look at lost revenue as a consequence of Users who come off the NTS.

National Grid believes it is essential to consider how much revenue is, by consequence of any update of a Shorthaul product, has on the remaining charges and User base who would pay as a result. This would, in National Grid's view allow impacts on other charges to be more predictable and stable.

General Summary on the current position of the 0670R review group:

The review workgroup [as a majority?] support the inclusion of a Shorthaul type product as part of the Transportation Charging arrangements.

Developing consensus in this area in terms of design and application may be challenging as there are differing views on this.

Understanding more on what the UNC baseline this would potentially be changing from is considered necessary to fully inform any potential modification that could come off concluding 0670R and updates from 0678 and 0686 will provide this.

Possible next steps

Workgroup noted that a baseline needs to be understood in order to meaningfully develop any 'shorthaul' type charge. This would be known once any decisions on the charging modifications 0678 and 0686.

Workgroup discussed whether Request Workgroup 0670R should close or remain open, pending further input from Ofgem regarding its consideration of Modification 0678 and its alternatives.

Option 1

One suggestion was to ask Panel to refer the Request 0670R back to workgroup to enable discussions to continue if/when needed and to enable quick standup of Workgroup to discuss any Ofgem input which may be forthcoming.

A Workgroup Participant summarised thus:

[A number of Workgroup participants] believe that the 0670 R Workgroup should be temporarily suspended until such time as Ofgem makes a determination on Modification 0678 (and its alternatives) or provides interim feedback focused on the legitimacy of the OOC products contained with the various proposals.

Commented [RH11]: Text here from Nick Wye, WWA

The temporary suspension of Workgroup could take several formats. Placing 0670R on the NTSCMF monthly agenda with a note to say no updates expected until **xx Month** whilst allowing submission of questions or discussion starters/topics could be a way of efficiently maintaining a UNC Workgroup presence whilst awaiting input from Ofgem. There are several possible triggers for a formal resumption of normal Workgroup meetings. Examples include:

- e.g. if Ofgem reach a conclusion on compliance on one of the 0678 Modifications which contain a shorthaul product (0678B, D, G, H, I, J)
- e.g. Ofgem impact assessment completed with a 'minded to' implement one of the Modifications which does not contain a shorthaul product.
- e.g. Any relevant updates from the proposer related to any further development that could include the two points on Ofgem updates

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One of the **Workgroup Participants** notes that Ofgem should

- set out clearly the reasoning behind its views;
- provide suitably well-defined guidance on any future 'shorthaul' product construction; AND
- where Ofgem's conclusion means it is appropriate, allow industry enough time to develop a suitable product to allow implementation in parallel with any Modification 0678 reforms.

Commented [RH12]: Concepts here from Nick Wye WWA

National Grid, as the proposer supports an approach where the Workgroup is not formally closed, remains an open workgroup to provide inputs and it provides, in its view, several benefits to take account of relevant updates and inputs:

- Timely discussion on any development including response to any Ofgem or industry updates and inputs;
- Given the interest in this topic, it provides a useful means to keep up to date and also provide input where it may be challenging to resource attending regularly;
- Retaining a as a workgroup on NTSCMF's agenda, a regular opportunity to discuss and keep on top of discussions, updated and also any related charging matters from other areas of development on NSTCMF's agenda and outputs.

Option 2

Another suggestion was to close the Workgroup entirely and await Ofgem input before discussing any response as part of any Modification Workgroup raised subsequently. Several parties raised concerns around enabling smaller players to input into the process in the intervening period. Based on a potential timetable submitted by National Grid to Workgroup on 04 June 2019 (Slide 27) it is likely that the duration of workgroup process required for this could be approximately 6 months, depending on any alternatives being submitted frequency of workgroup meetings, any Urgency request etc.

30 July 2019

At the Workgroup meeting on 30 July 2019, Workgroup Participants discussed potential closure of the Request Workgroup. The conclusion was...

Either

- agreed that the most appropriate course of action was to request an extension from Panel, potentially until October 2019.
- were split as to what was most appropriate and therefore could not reach a consensus as to whether to request an extension from Panel...

Commented [RH13]: Alan, please select the most appropriate or re-write...

5 Recommendation

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that

- Request 0670R should be returned to Workgroup 0670R for further assessment and
- A Workgroup Report should be submitted for consideration at the October 2019 Panel.

Commented [RH14]: Modify as needed