








UNC Workgroup Report		At what stage is this document in the process?
<h1>UNC 0720S:</h1> <h2>Amendments to the Agreed Target Quantity at the Moffat Interconnection Point</h2>		<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p>Purpose of Modification:</p> <p>This Modification seeks to change the definition of Agreed Target Quantity in the Interconnection Agreement between <u>National Grid Gas plc and GNI (UK) Ltd.</u></p>		
	<p>The Workgroup recommends that this modification should be subject to self-governance</p> <p>The Panel will consider this Workgroup Report on 16 July 2020. The Panel will consider the recommendations and determine the appropriate next steps.</p>	
	<p>High Impact:</p> <p>n/a</p>	
	<p>Medium Impact:</p> <p>National Grid Gas Transmission, GNI (UK), Shippers</p>	
	<p>Low Impact:</p> <p>n/a</p>	

Commented [L01]: Awaiting revised Mod further to Discussion in JulyTWG

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Timetable		
Modification timetable:		
Initial consideration by Workgroup	02 April 2020	
Workgroup Report presented to Panel	16 July 2020	
Draft Modification Report issued for consultation	16 July 2020	
Consultation Close-out for representations	07 Aug 2020	
Final Modification Report available for Panel	13 July 2020	
Modification Panel decision	20 Aug 2020	
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Commented [LO2]: Extension requested to September at July UNC Panel.

1 Summary

What

National Grid's National Control Centre are observing large late in the day changes to the rates and End of Day quantities to be offtaken at the Moffat interconnector (as notified to National Grid by GNI(UK)¹ via Exit Flow Profiles). This is understood to be due to issues with the mechanism used to calculate the Agreed Target Quantity (ATQ). Currently, Exit Flow Profiles sent to National Grid by GNI(UK) contain an End of Day quantity based purely on the aggregation of the prevailing net shipper nominations for the island of Ireland, Stranraer, and any Operational Balancing Account (OBA) Cumulative Steering Difference (CSD) correction. This is defined as the 'Agreed Target Quantity'.

GNI(UK) is bound by the Interconnection Agreement (IA) to notify National Grid of an ATQ that shall be obtained from the aggregate net confirmed nomination quantities. However, since the introduction of the EU Network Code on Balancing and the Corrib field coming online, GNI(UK) are experiencing issues with this mechanism within day. Shippers are understating volumes at the beginning of the day, and accurate (higher) nominations are not being provided until later in the day. National Grid and GNI(UK) wish to enable GNI(UK) to provide an ATQ which more accurately predicts End of Day quantities earlier in the Gas Day.

Why

Late notification of changes to flow cause operational balancing issues for both National Grid and GNI(UK). This could lead to inefficient compressor usage by both National Grid and GNI as well as the possibility of the system operators taking residual balancing actions that may not be needed. The shipper community is also affected as late notification of changes to flow can cause inaccuracies in the Predicted Closing Linepack (PCLP) published by National Grid. As the only available linepack forecast made available externally by National Grid, inaccuracies have the potential to have a material impact on market prices and trading behaviour. National Grid is of the opinion that making this change to the IA would have a positive impact on all of these issues.

How

This Modification proposes changes to both the Interconnection Agreement between National Grid and GNI (UK) and the tripartite agreement between National Grid, GNI (UK) and GNI² at the Moffat interconnector, which will provide a change in the way in which the ATQ is calculated. This change will aim to provide all parties with a much more accurate representation of End of Day quantities earlier in the Gas Day.

The current methodology states that GNI(UK) must submit an ATQ which is equal to the aggregate net of shipper nominations plus a Cumulative Steering Difference Correction (CSDC). The proposed change to the ATQ calculation is to add in an additional GNI forward flow quantity calculated with reference to the aggregate exit demand within GNI's system (including Virtual Reverse Flow) minus the anticipated entry quantities at other entry points (these are currently Bellanaboy (Corrib) and Inch, but there may be more in due course).

¹ GNI (UK) is a transmission system operator for the gas interconnector between Moffat in Scotland and the Republic of Ireland and the Isle of Man, which is physically connected to the NGG System at the Moffat Interconnection Point.

² Gas Networks Ireland Limited (GNI) is the transmission system operator for the Republic of Ireland's gas transmission system (GNI System) for the transmission of gas to, in and from the Republic of Ireland.

For the avoidance of doubt this Modification does not seek to make any changes to the way in which the Steering Difference and Operational Balancing Account are managed. In accordance with the EU Interoperability Code, GNI (UK) and National Grid would seek to maintain an OBA balance that is as close to zero as possible.

2 Governance

Self-Governance

This Modification should provide incremental benefit through improved quality of information. However, the issue is limited to a single point (Moffat Interconnection Point) and so it is not considered to have a material enough impact upon the operation of the market to warrant an Authority decision.

UNC Panel determined in March 2020, meets the criteria for Self-Governance as this Modification is unlikely to have a material impact on the operation of the market, gas consumers, competition, pipeline operations, security of supply, governance procedures and does not discriminate between code

Requested Next Steps

This Modification should:

- be subject to self-governance
- Proceed to Consultation

3 Why Change?

As per the Interconnection Agreement between GNI (UK) and National Grid, and the tripartite agreement between National Grid, GNI (UK) and GNI, GNI (UK) currently provide National Grid with flow notifications for Moffat which are obtained using aggregate net shipper nominations.

The combination of low shipper nominations earlier in the Gas Day and the large upward renominations late in the Gas Day, generate unreliable End of Day estimates early in the day. The uncertainty created by inaccuracies in End of Day Quantities submitted to National Grid, may result in inefficient use of compression, and impair efficient balancing resulting in an increased cost to Industry. There is also an impact on the accuracy of the PCLP, which as the only available linepack forecast made available externally by National Grid, can have significant impact on market prices and trading behaviour.

By continuing to accept these faults with the current mechanism for calculating End of Day quantities we are missing an opportunity to improve the economic and efficient operation of the NTS.

4 Code Specific Matters

Reference Documents

UNC EID (European Interconnection Document)

UNC TPD (Transportation Principal Document)

EU Interoperability Network Code

5 Solution

To help resolve the issue, GNI (UK) and National Grid wish to amend the IA, and National Grid, GNI (UK) and GNI wish to amend the tripartite agreement, to change the way in which Exit Flow Profiles are calculated. The proposed solution is to re-define the ATQ to include an additional flow quantity submitted by GNI. The additional flow quantity will be determined by GNI with reference to the aggregate exit demands within GNI's system (including Virtual Reverse Flow) minus the anticipated entry quantities at entry points other than Moffat. (This currently includes Bellanaboy (Corrib) and Inch).

Analysis carried out by GNI demonstrates this change would result in a more accurate estimation of Moffat demand earlier in the gas day. GNI (UK) would re-align the Agreed Target Quantity with the Aggregate Net Nominations i.e. revert to the current method for determining the ATQ, at midnight, such as there is no expected impact on the OBA at the end of the day.

In the event of a transportation constraint in the NTS that impacts upon National Grid's ability to export gas at Moffat, then upon notifying GNI(UK) of an Exceptional Event the additional GNI forward flow quantity GNI forward flow quantity shall be zero unless otherwise agreed by the parties.

This UNC Modification seeks to implement the new methodology by revising the wording in the Moffat IA and tripartite as per UNC European Interconnector Document (EID), Section A section 4, which states 'Relevant Interconnection Provisions' will not be amended other than with approval from shippers / pursuant to a Code Modification.

The wording in the IA annex H and the Tripartite annex B shall be amended as per the appendix to this document.

6 Impacts & Other Considerations

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

None

Consumer Impacts

This Modification aims to both improve data provision for the shipper community and the efficient commercial operation of the NTS, this may benefit a range of gas market stakeholders including consumers.

Consumer Impact Assessment

(Workgroup assessment of proposer initial view or subsequent information)

Criteria	Extent of Impact
Which Consumer groups are affected?	<ul style="list-style-type: none"> Domestic Consumers Small non-domestic Consumers Large non-domestic Consumers Very Large Consumers
What costs or benefits will pass through to them?	There is an assumption that overall the market will improve balancing efficiencies and in turn this will result in cost savings for consumers.

When will these costs/benefits impact upon consumers?	This would be immediate on implementation,
Are there any other Consumer Impacts?	None identified.
General Market Assumptions as at December 2016 (to underpin the Costs analysis)	
Number of Domestic consumers	21 million
Number of non-domestic consumers <73,200 kWh/annum	500,000
Number of consumers between 73,200 and 732,000 kWh/annum	250,000
Number of very large consumers >732,000 kWh/annum	26,000

Cross Code Impacts

None

EU Code Impacts

COMMISSION REGULATION (EU) 2015/703 establishing a network code on interoperability and data exchange rules Article 4, paragraph 2 states:

Before concluding or amending an interconnection agreement which contains the rules referred to in Article 3 (c) rules for the matching process; (d) rules for the allocation of gas quantities; (e) communication procedures in case of exceptional events; transmission system operators shall invite network users to comment on the proposed text of those rules at least two months before the agreement is concluded or amended. The transmission system operators shall take the network users' comments into account when concluding or amending their interconnection agreement.

The UNC Modification process has allowed Users to comment and the Proposer believes that it satisfies the requirements of the EU Interoperability Code as shown above in terms of the consultation and the two months notice.

Central Systems Impacts

None

Workgroup Impact Assessment

Background

Discussion at the Transmission Workgroup and UNC Panel commenced in March 2020 whereby the Proposer highlighted that this is a transparency Modification which provides the governance for National Grid and GNI (UK) Ltd to amend the Interconnection Agreement

The Proposer outlined that the key change as follows:-

Amending Annex B (Nominations) of the Tripartite Agreement between National Grid, GNI(UK) and GNI, and amending Annex H (Operational Balancing Account and Allocation Principles) of the Interconnection Agreement between National Grid and GNI(UK) to reflect that the Agreed Target Quantity (ATQ) for each Gas Flow Day shall additionally include an additional GNI forward flow quantity. This quantity is additional in the

sense that it is added to the GNI net forward flow shipper nominations and it shall be determined with reference to the aggregate Exit demands on the GNI Transportation System.

The proposer outlined that the key benefit as follows: To improve the GNI forecast End of Day quantities to enable GNI(UK) to submit more accurate Offtake Profile Notifications (OPN's) at the start of the day at the Moffat Interconnector resulting in National Grid and the market having more accurate data at the start of the day.

The proposer highlighted that the intention will be to net off the Shipper nominations in order to provide the expected flow quantity and then finally to net off any non-Moffat entry supplies which will leave the expected flow quantity at Moffat.

The proposer provided a presentation on the mechanics of how this currently operates and what changes would be anticipated. This presentation can be located on the following link: <https://www.gasgovernance.co.uk/0720/070520>.

Workgroup Participants did not raise any questions relating to the presentation. The proposer identified the key changes to (Annex B and H). Some minor points relating to the Modification (GNI system demand), were raised by Workgroup Participants and the Proposer updated the Modification to V2.0 (25 June 2020).

The Proposer would like to explore the option of including information from both GNI and PTL (TSO for Northern Ireland) and thus another update to the Modification (to bring it to v3.0) is expected. Therefore, the Workgroup requests an extension to the reporting date to September 2020, with the possibility of reporting to August where possible.

Commented [LO3]: To be confirmed at July UNC Panel

Governance

UNC Modification Panel raised two questions; one relating to commercial impact suggesting that by switching the driver to GNI data this could skew the market and requested that the Proposer provides clarification of what protections would be put in place.

The Proposer believes that the current regime can skew the market by having too low an offtake estimated at Moffat at the start of the day and this Modification seeks to rectify this by ensuring the GB market has access, via the published PCLP value, to the most accurate data possible. The Proposer also advised Workgroup that there are two protection in place-

1. at Midnight the process for determining the ATQ shall revert back to the current arrangements to ensure no impact on the Operations Balancing Arrangements (OBA)
2. in the event of constraints, the process to determine the ATQ will revert back to current arrangements and this will ensure that commercial actions take effect in a timely manner.

The second question raised by UNC panel, was to consider the materiality of the proposal in terms of governance of the Modification. The Proposer advised that this Modification should follow Self Governance as it is an incremental change to improve data accuracy at a single point on the network which has no large materiality impacts on the market identified.

A Workgroup Participant requested clarification on whether domestic demand relates to Republic of Ireland (ROI) or the whole of Irelands demand. The proposer advised that it did relate to (ROI), specifically demand from the GNI network only.

The Proposer discussed with Workgroup how National Grid would deal with constraint scenarios and provided an updated version of the Modification to explain this. The Workgroup reviewed the changes at the July meeting.

An early representation had been raised on the initial version of the Modification. The proposer noted these changes to clarify the relationship of GNI(UK) and GNI and agreed that some of the language used in the Modification needed to be updated and as a consequence a further version of the Modification was reviewed during the June 2020 Workgroup.

It was agreed at the July Workgroup meeting that the Workgroup request that this Modification:

- Request a further extension to September 2020, with the possibility of reporting to August where possible.

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) Coordinated, efficient and economic operation of <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers. 	None
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 Co-operation of Energy Regulators.	None

The implementation of this proposal will better facilitate the relevant objectives of the UNC:

a) efficient and economic operation of the pipeline system:

The increased accuracy of End of Day quantities earlier in the gas day could result in improved balancing, more efficient use of compression and improved data provision to industry via a more accurate PCLP figure. These factors all contribute to a more efficient and economic operation of the pipeline system.

b ii) efficient and economic operation of the pipeline system of one or more relevant gas transporters

As Moffat Interconnector connects the Transmission Systems operated by National Grid and GNI, the benefits outlined in the paragraph above will be consistent across both systems.

Commented [RH4]: Relevant Gas Transporters is GB only

The Workgroup agreed with the statements above by the Proposer in relation to the Relevant Objectives.

Note relevant gas transporters is GB only – so reference to GNI is useful but not against b)ii)

8 Implementation

As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

9 Legal Text

This Modification requires no changes to UNC text. However, to enact these changes, amendments will be made to the Moffat Interconnection Agreement between GNI (UK) and National Grid and also to the Tripartite agreement between National Grid, GNI(UK) and GNI.

The proposed amendments to the Interconnection Agreement and the Tripartite agreement are submitted as separate documents which can be found here: <https://www.gasgovernance.co.uk/0720>

10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

- Self-governance modification procedures should apply
- This proposal requires further assessment and should be returned to Workgroup.

*The Workgroup requests an extension to **report back to Panel in September 2020**, or earlier where possible.*