UNC Transmission Workgroup Minutes

Thursday 02 July 2020 via Microsoft Teams

Attendees

Loraine O'Shaughnessy Chair)	(LOS)	Joint Office
Helen Cuin (Secretary)	(ECS) (HC)	Joint Office
Adam Bates	(AB)	South Hook Gas
Andrew Pearce	(AP)	BP
Angus Paxton	(AP)	Poyry
Anna Shrigley	(AS)	Eni Trading & Shipping
Anna Stankiewicz	(ASt)	National Grid
Bethan Winter	(BW)	Wales & West Utilities
Bill Reed	(BR)	RWE
Christiana Sykes	(CS)	Shell
Chris Wright	(CW)	Exon Mobil
Emma Buckton	(EB)	Northern Gas Networks
Iwan Hughes	(IH)	VPI Immingham
Jeff Chandler	(JCh)	SSE
Jennifer Randall	(JR)	National Grid
John Costa	(JCo)	EDF Energy
Julie Cox	(JCx)	Energy UK
Kamila Nugumanova	(KN)	ESB
Kamla Rhodes	(KR)	Conoco Phillips
Leyon Joseph	(LJ)	SGN
Malcolm Montgomery	(MM)	National Grid
Max Lambert	(ML)	Ofgem
Nick Wye	(NW)	Waters Wye Associates
Paul Youngman	(PY)	Drax
Phil Hobbins	(PH)	National Grid
Pavanjit Dhesi	(PD)	Interconnector
Richard Fairholme	(RF)	Uniper
Shiv Singh	(SS)	Cadent
Steven Britton	(SB)	Cornwall Energy
Steve Pownall	(SP)	Xoserve
Terry Burke	(TB)	Equinor
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Copies of all papers are available at: <u>www.gasgovernance.co.uk/tx/020720</u>

1. Introduction and Status Review

Loraine O'Shaughnessy (LOS) welcomed all parties to the meeting and confirmed the order of the agenda.

1.1. Approval of minutes (04 June 2020)

The minutes from the previous meeting were approved.

1.2. Review of Outstanding Actions

0301: Ofgem Update - Decision to reject Uniform Network Code (UNC) 667: Inclusion and Amendment of the Entry Incremental Capacity Release Net Present Value test in the Uniform Network Code: Ofgem to provide further clarity on the progression of decarbonisation in order to better understand the decision to reject Modification 0667.

Update: Max Lambert (ML) explained that this was ongoing and an action update would be provided in due course. Julie Cox (JCx) asked if Ofgem could provide a view on the context of the proposal and the likely timelines for an action plan. ML agreed to provide some timelines as a post meeting update. **Carried Forward**

0302: Ofgem Update - Decision to reject Uniform Network Code (UNC) 667: Inclusion and Amendment of the Entry Incremental Capacity Release Net Present Value test in the Uniform Network Code: With reference to the NPV Test to progress decarbonisation, Ofgem to provide clarity on the direction of travel.

Update: As above ML explained this action was also ongoing and further to the request for Ofgem to provide a view and some indicative timelines ML agreed to provide a post meeting update. **Carried Forward.**

0601: Modification 0726 (Urgent): All Workgroup Participants to submit any questions to Jon Dixon, Ofgem. Joint Office will publish these alongside the Modification.

Update: Julie Cox (JC) enquired whether interest payments would attract a rate of return for the networks. ML advised that he would provide a post meeting update which had been included in the Ofgem decision letter. (see below) **Carried Forward.**

Post Meeting Note: In response to the question regarding Modification 0726 'COVID-19 Liquidity relief scheme for Shippers' from Julie Cox, relating to how interest would be treated under the implementation of the Modification, Ofgem would like to forward on the below response to this query lifted from page 3 of Ofgem decision letter on 23 June 2020:

"Some respondents queried how this interest would be treated for price control purposes. As noted in our open letter, any interest accrued by the GTs net of their cost of capital would be used to offset any bad debt that may accrue as a result of scheme participants' failure to repay deferred charges plus interest, once all avenues to recover the money have been exhausted. In the event that there is no such bad debt, the interest charged would be treated as revenue and offset against other transportation charges."

1.3. Ofgem update

Max Lambert (ML) provided an overview of the Industry Updates which have been published on the meeting page for this meeting for further information, covering:

Modification 0729 Applying a discount to the Revenue Recovery Charge at Storage Points: Urgency Application

ML advised that this has not been granted Urgent status as the request against the urgency criteria set out in Ofgem's published guidance was not justified.

Ofgem information for energy licensees on coronavirus (COVID-19) response – 30 June update

In April 2020, Ofgem published information regarding the reprioritisation of their forward work to allow the industry to focus on critical operations to keep consumers and staff safe. ML provided a link to the Ofgem webpage which outlines the updated expectations and information: <u>https://www.ofgem.gov.uk/publications-and-updates/ofgem-information-energy-licensees-coronavirus-covid-19-response-30-june-update</u>

Authority decision on Modification 0726 'COVID-19 Liquidity Relief Scheme'

This Modification was granted urgent status and has been implemented on 24 June 2020.

Modification 0727 Increasing the Storage Transmission Capacity Charge Discount to 80%: Urgency Application

This Modification had been granted Urgent status. The UNC Modification Panel are considering the representations received on 03 July 2020 and will provide Ofgem with a recommendation for an Ofgem decision.

Modification 0728A/B/C/D Introduction of a Conditional Discount for Avoiding Inefficient Bypass of the NTS: Urgency Application

These Modifications had been granted Urgent status. The UNC Modification Panel are considering the representations received on 03 July 2020 and will be providing Ofgem with their recommendations for an Ofgem decision.

Statutory Consultation on the proposed addition of a new exit point to National Grid Gas Plc (NTS) Gas Transporter Licence

On 12 June 2020, Ofgem published a statutory consultation proposing to modify Part F of Special Condition 5G (Determination of Incremental Obligated Exit Capacity volumes and the appropriate revenue drivers to apply and the creation of Zero Licence Baseline Capacity Exit Points) of National Grid Gas Plc's (NTS) Gas Transporter Licence.

The proposal is to add one new exit point, "Saltholme Power Station", to Table 8: Licence Baseline Exit Capacity, in Part F of Special Condition 5G.

Ofgem are seeking views on the issues raised in this statutory consultation by 10 July 2020 to: <u>max.lambert@ofgem.gov.uk</u> or <u>Gas.TransmissionResponse@ofgem.gov.uk</u>.

Further information is published at: <u>https://www.ofgem.gov.uk/publications-and-updates/statutory-consultation-proposed-addition-new-exit-point-national-grid-gas-plc-nts-gas-transporter-licence</u>

Modification 0721 'Shipper submitted AQ Corrections during COVID-19'

ML confirmed that Ofgem decided to reject this Modification on 02 June 2020, and concluded that implementation of UNC721 would not better facilitate the achievement of the relevant objectives.

1.4. **Pre-Modification discussions**

LOS explained that at the last meeting Jennifer Randall (JR) had noted the intention to table a pre-modification for Request 0705R. JR clarified that this related to the capacity requirements and believed this would entail a methodology change not a UNC Modification. JR confirmed she would explain more under Workgroup 0705R discussions.

LOS also referred to Modification 0729 – Applying a discount to the Revenue Recovery Charge at Storage Points and asked if Nick Wye (NW) would like to introduce the Modification to the Transmission Workgroup. NW confirmed that this will be considered at the NTSCMF on Tuesday 07 July.

Julie Cox (JCx) advised of a new Modification currently being considered for off-peak and firm capacity and whether off-peak capacity can be purchased day head (by 2/3pm). JCx explained the background to firm day ahead capacity and potential opportunities for the development of a within day off-peak / interruptible capacity product. Having looked at the discounts which have been reduced she believed there was an opportunity to raise a Modification to allow off-peak interruptible capacity to be purchased within day.

John Costa (JCo) believed there were some gaps in the current arrangements, and he wanted to see a Modification raised to address these. He explained some preliminary discussions are taking place with National Grid and hoped National Grid would raise the Modification. Phil Hobbins (PH) clarified that National Grid had been advised of the Modification on the morning of today's meeting and this would need further consideration with capacity experts on how best to progress the concept.

Jennifer Randall (JR) confirmed that National Grid may wish to consider this further under the Access Review, to consider the capacity issues and was happy to follow this up offline and come back next month with some more information for the Workgroup.

Pauly Youngman (PY) asked about the potential system changes for the Modification and suggested such Modification could focus on mimicking current definitions and using current arrangements, amending elements of the systems to allow the arrangements.

Anna Shrigley (AS) supported the thinking behind the Modification, she believed PRISMA have a solution for this, a default function which anticipated paying the reserve price, which minimises the scope for errors. AS noted that under the UNC there is no provision or remedy for administration errors, so this is really important.

Post Meeting Note: AS wished to clarify regarding the introduction of Within Day Interruptible Capacity Auctions, consideration could also be given to aligning Gemini interruptible auctions with PRISMA interruptible auctions and introduce interruptible products for Yearly, Quarterly and Monthly Auctions. AS suggested given that these interruptible products are already established on PRISMA, it would be easier to justify their introduction to the UNC.

AS clarified on Prisma, interruptible auctions are held once a day after the closure of the respective firm auction product.

Auction Calendar for interruptible capacity products										
Y,Q,M	see above	see above	The day after closure of respective firm product 09:00.	see above	The day after closure of respective firm product (7:00)	no later than next business day *	Ascending Clock auction			
Day	daily	D1	17:30	17:30-18:00	At the time the auction starts	no later than 30 minutes *	Uniform Price auction			
	*09:00 after closing of the bidding round									

Nick Wye (NW) asked about the intention for entry and exit, the drivers, and about the complications releasing interruptible capacity within day, which may cause problems. Paul Youngman (PY) did not believe this was insurmountable.

JR confirmed the need for National Grid to consider this offline to enable them to provide a view on the potential Modification.

PH expressed a preference for advanced notice of pre-modifications to avoid on the fly conversations, and to better aid Workgroup discussions. He suggested that all pre-modifications should be ideally supported with a draft outline of the suggested change.

LOS reiterated the importance of receiving information in advance of the meeting to aid discussion and to give workgroup adequate time to review, JC advised that unfortunately due to technical issues experienced by JC that the information was provided late and thanked workgroup for allowing this to be tabled.

It was agreed, to support progressing the concept introduced today, that the Workgroup would benefit from further offline discussions with interested parties. It was suggested in support of this National Grid should arrange an offline meeting and for the Joint Office to circulate an email for parties to register their interest in joining discussions. This would then aid more information being provided at the next Workgroup meeting.

New Action 0701: National Grid (JR) to arrange an offline meeting to consider and define the scope/requirements of a within day off-peak / interruptible capacity product.

New Action 0702: National Grid (PH/JR) to consider further the concept of a within day offpeak / interruptible capacity product Modification with interested parties and provide an update at the next meeting.

New Action 0703: Joint Office (LOS) to circulate an email inviting interested parties to engage with National Grid in the development of a within day off-peak / interruptible capacity product.

Post Meeting Note: Action 0703 complete. Email issued on 03 July 2020.

2. European Codes Update

2.1. National Grid update (PH)

Phil Hobbins (PH) provided an EU Gas Quality Update confirming that the European Committee for Standardisation (CEN) is continuing to work on including a Wobbe1 Index range within the harmonised gas quality standard EN 16726:2015.

PH confirmed that the CEN taskforce (Taskforce 1) had produced a report which captures its previous three years' work. This report has been circulated for comment to members of the taskforce which National Grid has seen via European Network of Transmission System Operators for Gas (ENTSOG).

The key proposals which have not changed are:

- A 'wide' EU entry range of 46.44 MJ/m3 to 54.00 MJ/m3 (15/15 reference conditions)
- To establish a 'classification' system for exit points

PL explained that the report summarises the work which has been done and what the proposals are, there was nothing new to note, however feedback was requested before moving to the next stage. PH provided a table of formulas for the Exit Classification System and confirmed that some work has been undertaken on looking at past index ranges.

PH explained that the next step will be to review the CEN report to enable CEN to provide a submission to the Madrid Forum in October. PH reported that this is likely to remain within CEN governance for the rest of 2020 and National Grid do not expect a formal CEN vote to adopt the proposals into the standard, until there is clarity on the regulatory framework for implementation of the exit classification system. PH explained that National Grid are not intending on feeding in any comments to the report. The Taskforce will reconvene in September to look to finalise the report in October.

PH confirmed that the report is relevant in context for the Institution of Gas Engineers and Managers (IGEM) consultation which proposes changes to the UK gas quality specification and reminded the Workgroup that this IGEM consultation closes on 30 July 2020.

PH believed IGEM have organised for an GSMR Review webinar on the 09 July 2020. PH confirmed that he will provide a copy of the invite to the Joint Office for onward circulation and prior permission has been provided from IGEM to share the invite to register for the webinar.

New Action 0704: Joint Office (LOS) to circulate IGEM webinar for the 09 July 2020.

Paul Youngman (PY) referring to the governance, enquired in the absence of a wider agreement how National Grid envisage this operating. PH explained there is some uncertainty, however National Grid wish to retain access to ENTSOG. PH was not sure what this would look like going forward and couldn't provide much more information at the present time.

PH asked whether the Workgroup would like a copy of the CEN Wobbe index Report. It was agreed to publish the report as a supporting paper for today's meeting.

Post Meeting Note: CEN Wobbe index Report circulated on 02 July 2020.

¹ The Wobbe Index is a measure of the interchangeability of fuel gases and their relative ability to deliver energy. It gives an indication of whether a turbine or burner will be able to run on an alternative fuel source without tuning or physical modifications.

2.2. Consequential impacts of coronavirus

LOS confirmed that Ofgem had provided an update in item 1.2 on recent modifications raised. LOS asked PH if he would like to give an update from National Grid in respect of recent webinars being held.

PH confirmed National Grid had been providing bi-weekly COVID-19 webinars, however these have been ramped down with updates being provided by exception. PH also confirmed that National Grid have moved to a GNCC 3 hours shift pattern (from 12 hours) and are continuing to monitor activities.

3. Workgroups

- 3.1. 0705R NTS Capacity Access Review 0671 New Capacity Exchange process at (Report to Panel 15 October 2020) www.gasgovernance.co.uk/0705
- 3.2. 0720S Amendments to the Agreed Target Quantity at the Moffat Interconnection Point

(Report to Panel 16 July 2020) www.gasgovernance.co.uk/0720

4. Issues

No issues were raised.

5. Any Other Business

5.1. Gemini System Enhancements

PH provided a summary of the Gemini System Enhancements (GSE) project, explaining that the scope of GSE project includes a number of items that will improve the application of the Gemini system. PH confirmed that a Workshop was held 18 months ago, and work has been undertaken with Xoserve to ascertain what can be incorporated into this project.

PH reported that further Workshops will be held on various dates between 9 July and 23 July 2020, and these have been advertised within the Ops Forum and Xoserve have issued invites, however the current take-up has been low.

PH encouraged involvement and asked if anybody wishes to participate in the workshops or would like more information to contact the team or the project mailbox: <u>mailto:box.Xoserve.GeminiSystemEnhancements@Xoserve.com</u>

6. Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Time / Date	Venue	Workgroup Programme
10:00 Thursday 06 August 2020	Teleconference	Standard Agenda
10:00 Thursday 03 September 2020	Teleconference	Standard Agenda
10:00 Thursday 01 October 2020	ТВС	Standard Agenda
10:00 Thursday 05 November 2020	ТВС	Standard Agenda
10:00 Thursday 03 December 2020	ТВС	Standard Agenda

			Action Table (as at 02 July 2020		
Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0301	05/03/20	1.2	Ofgem Update - Decision to reject Uniform Network Code (UNC) 667: Inclusion and Amendment of the Entry Incremental Capacity Release Net Present Value test in the Uniform Network Code: Ofgem to provide further clarity on the progression of decarbonisation in order to better understand the decision to reject Modification 0667.	Ofgem	Carried Forward
0302	05/03/20	1.2	Ofgem Update - Decision to reject Uniform Network Code (UNC) 667: Inclusion and Amendment of the Entry Incremental Capacity Release Net Present Value test in the Uniform Network Code: With reference to the NPV Test to progress decarbonisation, Ofgem to provide clarity on the direction of travel.	Ofgem	Carried Forward
0601	04/06/20		<i>Modification 0726 (Urgent):</i> All Workgroup Participants to submit any questions to Jon Dixon, Ofgem. Joint Office will publish these alongside the Modification.	All	Carried Forward
0701	02/07/20	1.4	National Grid (JR) to arrange an offline meeting to consider and define the scope/requirements of a within day off-peak / interruptible capacity product.	National Grid (JR)	Pending
0702	02/07/20	1.4	National Grid (PH/JR) to consider further the concept of a within day off-peak / interruptible capacity product Modification with interested parties and provide an update at the next meeting.	National Grid (PH/JR)	Pending
0703	02/07/20	1.4	Joint Office (LOS) to circulate an email inviting interested parties to engage with National Grid in the development of a within day off-peak / interruptible capacity product.	Joint Office (LOS)	Email issued 03/07/20
0704	02/07/20	2.1	Joint Office (LOS) to circulate IGEM webinar for the 09 July 2020.	Joint Office (LOS)	Pending

UNC Workgroup 0705R Minutes NTS Capacity Access Review

Thursday 02 July 2020 via Microsoft Teams

Attendees

Loraine O'Shaughnessy Chair)	(LOS)	Joint Office
Helen Cuin (Secretary)	(HC)	Joint Office
Adam Bates Andrew Pearce	(AB)	South Hook Gas BP
	(AP)	
Angus Paxton	(AP)	Poyry
Anna Shrigley Anna Stankiewicz	(AS) (ASt)	Eni Trading & Shipping National Grid
Bethan Winter	()	Wales & West Utilities
Bill Reed	(BW)	RWE
	(BR) (CS)	Shell
Christiana Sykes Chris Wright	(CS) (CW)	Exon Mobil
Emma Buckton	(CW) (EB)	Northern Gas Networks
Iwan Hughes	(EB) (IH)	VPI Immingham
Jeff Chandler	(III) (JCh)	SSE
Jennifer Randall	(JR)	National Grid
John Costa	(JCo)	EDF Energy
Julie Cox	(JCx)	Energy UK
Kamila Nugumanova	(SCX) (KN)	ESB
Kamla Rhodes	(KR)	Conoco Phillips
Leyon Joseph	(LJ)	SGN
Malcolm Montgomery	(MM)	National Grid
Max Lambert	(ML)	Ofgem
Nick Wye	(NW)	Waters Wye Associates
Paul Youngman	(PY)	Drax
Phil Hobbins	(PH)	National Grid
Pavanjit Dhesi	(PD)	Interconnector
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Copies of all papers are available at: <u>www.gasgovernance.co.uk/0705/020720</u>

The Workgroup Report is due to be presented at the UNC Modification Panel by 15 October 2020.

1. Introduction and Status Review

Loraine O'Shaughnessy (LOS) welcomed all parties to the meeting.

1.1. Approval of minutes (04 June 2020)

The minutes from the previous meeting were approved.

1.2. Approval of Late Papers

None to approve.

1.3. Review of outstanding actions

0404: Exit User Commitment: Option D: National Grid (JR) to look further into option D and provide more clarity in September.

Amended Action 0404: National Grid (JR) to explore longer-term options for the exit capacity regime (including mirroring the entry regime on the exit side and zonal options and feed into consultation. Review Date: September 2020.

Update: Jennifer Randall (JR) explained the two-stage approach which had been discussed and agreed at the last meeting. JR suggested amending the action and confirmed an update will be provided in September. **Carried Forward**

0501: Grid to develop consultation regarding the User Commitment options in September. **Update:** JR confirmed an update will be provided in September. **Carried Forward**

0601: Exit User Commitment: Ofgem (ML) to provide an update from NTSCMF which will be circulated to Workgroup.

Update: Max Lambert (ML) confirmed this related to an NTSCMF Action, he believed David O'Neill would be providing the draft determinations to NTSCMF next week (07 July), when an update can then be provided to Transmission. **Carried Forward.**

2. Discussion

2.1. Entry User Commitment

JR provided an update on the Capacity Access Review and provided an overview of National Grid's proposal in relation to the substitution and the incremental process.

During the June Workgroup, JR advised that a draft Modification would be provided for July Panel however after analysing the requirements, JR confirmed that to implement these changes a change to the Entry Capacity Release Methodology Statement would be required and there would be a need to apply to Ofgem for a derogation to the requirement for an independent examination. JR clarified there would be no changes to the UNC. JR explained the need to appoint an independent examiner to make the changes and that National Grid are beginning to talk to Ofgem about applying for a derogation.

New Action 0701: *Entry User Commitment:* National Grid (JR) to provide a progress update on the changes to the User Commitment requirements in the ECR methodology.

2.2. Exit User Commitment

JR provided a summary of the User Commitment Reduction and confirmed that this option is considering whether User Commitment for capacity within baseline could be reduced, either to 1 year or to zero. JR recapped that at June's Transmission Workgroup the concern with this option is that it could lead to capacity bookings jumping around meaning that analysis for substitution and funded incremental capacity is undermined and inefficient solutions being identified.

JR explained that to quantify the issue National Grid have undertaken 2 pieces of analysis to quantify the risk and help draw up some assumptions. JR confirmed that further work will be undertaken with DNs and an update will be provided in due course.

New Action 0702: *Exit User Commitment:* National Grid (JR) to discuss the User Commitment Reduction analysis with DNs and provide an update on progress next month.

Julie Cox (JCx) enquired if this would be a UNC or methodology change. JR anticipated this being a methodology change at the moment but would confirm if this is the case.

New Action 0703: *Exit User Commitment:* National Grid (JR) to confirm whether a change to the Exit User Commitment requirements for capacity within baseline would require a UNC or Methodology change.

JR went onto explain Substitution confirming that a supporting presentation has been provided as a guide to the Exit Capacity Substitution Methodology for workgroup to review and feedback any comments to her<u>https://www.gasgovernance.co.uk/0705/020720</u> JR explained the option around providing more information about a capacity signal which is to be met through substitution. JR confirmed that a notice is provided regardless of how the capacity signal met through substitution is made (Enduring / QSEC or PARCA).

JCx asked about the PARCA process and the appropriate notice timings for substitution.

JR explained that Anna Stankiewicz (AS) had previously presented the timescales and the post notice actions. AS clarified the need to consider the mechanism to allow a response, as there is no process currently in place to react to a notice following enduring substitution requests. AS suggested, there would be a need to go back to the PARCA route, to use an opportunity to request capacity, as a quick fix.

JCx wished to consider the benefits and transparency, and that parties can only apply for PARCAs at certain times of the year. Considering the July process and booking up to baseline JCx believed this was an administration process and that the "closed" period could be reduced. JR explained the reconciliation process and substitution triggers, she clarified this is an all or nothing process whereas PARCA could provide other options.

Paul Youngman (PY) stressed he was struggling with Ofgems' view that there is plenty of capacity available for all users in terms of the PARCA rationalising process. He challenged why the industry have got a process where capacity is effectively nullified and challenged the purpose of the process, if there is excess capacity everywhere. JR explained there is not an excess of capacity everywhere, excess is not available in certain areas and this is why the PARCA process exists.

JR explained the fundamental nature of substitution where there is not an excess of capacity in certain places, and the capability of the network.

Max Lambert (ML) agreed to take away the concerns/comments raised about the PARCA process, and view of available capacity.

New Action 0704: Substitution: Ofgem to review the concerns raised about the availability of excess capacity and previously provided view, that there is plenty of capacity available through the PARCA process.

JR agreed to provide more analysis from National Grid at the next meeting.

It was suggested that National Grid also undertake a review of the 3-month process and work through a scenario for the Workgroup as it was understood the booking process under PARCA didn't need 3 months.

New Action 0705: *Substitution:* National Grid (JR) provide a view of the 3-month PARCA process.

The Workgroup considered the substitution process, where the substitution is coming from and better transparency.

JR went on to explain that when a notice is provided, it is asked whether this can be more specific in terms of the location. JR explained when a PARCA application is made, confidentiality agreements come into effect, limiting the information that can be shared about PARCAs with the industry. JR clarified that a further paper had been provided with some supporting information on the process. The Workgroup considered the Confidentiality statements, disclosure agreements and what options were available.

New Action 0706: *Substitution:* National Grid (JR) to consider transparency of projects and the use of Confidentiality statements and disclosure agreements.

New Action 0707: *Substitution:* National Grid (JR) to look at reducing analysis timescales required post enduring application process if that process were to be limited to capacity within baseline and impact this may have on the PARCA process being unavailable.

Malcom Montgomery (MM) explained in relation to capacity disruption, if consumption is in the opposite direction the substitution is unwound.

The Workgroup was also concerned with the prioritisation downstream. Shiv Singh (SS) asked about donor points and explained why DNs are not a donor point.

JR explained that there is an option around whether a party who is active at the entry/exit point that capacity is to be used to fulfil a substitution application can be given first refusal of that capacity. JR explained at the last Workgroup National Grid explained the disadvantages of a First Refusal option and that the process could end up in a perpetual cycle of substitution analysis.

JCx believed that the substitution process is overly complicated and needed further consideration. Angus Paxton (AP) believed this was created to mitigate the baselines in the licence, and originally raised in the context of entry capacity and the same concept is applied to exit.

JR confirmed a review is on the radar and agreed substitution needed further consideration. JR explained what is required and wished to note that this is more than minimal work.

JR presented a further option around whether National Grid can place greater reliance on the information DNs provide under UNC OAD Section H.

Bethan Winter (BW) challenged if this is applied to Shippers and not DNs. ML confirmed there are provisions for Shippers and provisions for Shippers and DNs.

Nick Wye (NW) asked for an overview of the short and longer term solutions. LOS suggested a timeline to provide this information. JR confirmed that this would be beneficial.

New Action 0708: National Grid (JR) to provide a timeline of work under the CAR in preparation for Panel update in October 2020 and to provide better visibility of the options.

3. Exit Consultation

See Action 0601.

4. Next Steps

Workgroup to consider:

- Entry User Commitment Update and how methodology change is progressed
- Exit User Commitment and Substitution and progress on any proposals

5. Any Other Business

None.

6. Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Time / Date	Venue	Workgroup Programme
10:00 Thursday	Teleconference	Entry User Commitment
06 August 2020		Exit User Commitment

		Substitution
		Timeline of Short / Long term solutions
		Commence development of Request
10:00 Thursday 03 September 2020	Teleconference	Development of Request Workgroup Report
10:00 Thursday 01 October 2020	ТВС	Completion of Request Workgroup Report

	Action Table (as at 02 July 2020)							
Action Ref			Action	Owner	Status Update			
0404	02/04/20	2.1	Amended: National Grid (JR) to explore longer-term options for the exit capacity regime (including mirroring the entry regime on the exit side and zonal options and feed into consultation. Review Date: September 2020.	National Grid (JR)	Carried Forward until September			
0501	07/05/20	2.1	National Grid to develop consultation regarding the User Commitment options in September.	National Grid (JR)	Carried Forward until September			
0601	04/06/20	2.2	<i>Exit User Commitment</i> : Ofgem (ML) to provide an update from NTSCMF which will be circulated to Workgroup	Ofgem (ML)	Carried Forward			
0701	02/07/20	2.1	<i>Entry User Commitment:</i> National Grid (JR) to provide a progress update on the changes to the User Commitment requirements in the ECR methodology.	National Grid (JR)	Pending			
0702	02/07/20	2.2	<i>Exit User Commitment:</i> National Grid (JR) to discuss the User Commitment Reduction analysis with DNs and provide an update on progress next month	National Grid (JR)	Pending			
0703	02/07/20	2.2	<i>Exit User Commitment</i> : National Grid (JR) to confirm whether a change to the Exit User Commitment requirements for capacity within baseline would require a UNC or Methodology change.	National Grid (JR)	Pending			
0704	02/07/20	2.2	Substitution: Ofgem to review the concerns raised about the availability of excess capacity and previously provided view that there is plenty of capacity available through the PARCA process	Ofgem (ML)	Pending			

0705	02/07/20	2.2	<i>Substitution:</i> National Grid (JR) provide a view of the 3-month PARCA process	National Grid (JR)	Pending
0706	02/07/20	2.2	<i>Substitution:</i> National Grid (JR) to consider transparency of projects and the use of Confidentiality statements and disclosure agreements.		Pending
0707	02/07/20	2.2	Substitution: National Grid (JR) to look at reducing analysis timescales required post enduring application process if that process were to be limited to capacity within baseline and impact this may have on the PARCA process being unavailable.	National Grid (JR)	Pending
0708	02/07/20	2.2	National Grid (JR) to provide a timeline of work under the CAR in preparation for Panel update in October 2020 and to provide better visibility of the options.		Pending

UNC Workgroup 0720S Minutes Amendments to the Agreed Target Quantity at the Moffat Interconnection Point

Thursday 02 July 2020

via Microsoft Teams

Attendees

Joint Office
National Grid
Wales & West Utilities
RWE
Shell
Exon Mobil
SSE
ESB
National Grid
Ofgem
Waters Wye Associates
Drax
National Grid
Interconnector UK
Cadent
Gazprom
Cornwall Energy
Xoserve
Equinor

Copies of all papers are available at: <u>www.gasgovernance.co.uk/0720/020720</u>

The Workgroup Report is due to be presented at the UNC Modification Panel by 16 July 2020.

1.0 Introduction and Status Review

Rebecca Hailes (RH) welcomed all parties to the quorate meeting.

Malcolm Montgomery (MM) confirmed that he received a communication expressing interest in having a similar arrangement to GNI UK from PTL (the TSO Operator for Northern Ireland). He suggested that the Workgroup continue, however, developing the Workgroup Report.

The Workgroup briefly considered the option of progressing the Modification as it is for GNI UK or delaying submission of the Workgroup Report to allow the incorporation of the necessary amendments for PTL.

RH confirmed a Workgroup Report would need to be submitted to meet the requested Panel reporting date anyway and suggested the Workgroup request a short extension.

1.1. Approval of minutes (04 June 2020)

The minutes from the previous meeting were approved.

1.2. Approval of Late Papers

None to approve.

1.3. Review of outstanding actions

0601: MM to provide an amended Modification incorporating Workgroup request for clarification on what GNI System Exit Demand specifically refers to and the solution where constraints occur.

Update: See item 2.0. Closed.

2.0 Review Amended Modification

MM provided a brief recap on the intent of the Modification to allow GNI UK more flexibility to provide End of Day quantities earlier in the Gas Day.

MM provided an overview of the Modification's amendments (v2.0).

Paul Youngman (PY) asked for further clarification on what an Exceptional Event would be. MM explained that this would be a Transportation constraint. PY asked if this was defined and where this was defined. MM explained this is defined within the Interconnection Agreement. PH confirmed that an Exceptional Event means any unplanned event that is not reasonably controllable, and this arises from the EU Interoperability Code. MM clarified that National Grid are using the existing structure and not changing any existing definitions.

PY suggested that the Workgroup should review the definition of Transportation Constraints as he believed it may only refer to entry points with the UNC General Terms. The Workgroup considered GTC Section 2.4.1.

MM provided a marked-up update to the Moffat Interconnection Agreement Annex B – Nominations, Section 2.1. No further comments were made from the Workgroup on the amendments to Annex B. MM confirmed there were no further changes to Annex H, shared with the Workgroup in June.

Upon reviewing the Modification, a number of further amendments were suggested which National Grid (MM) agreed to pick up when incorporating changes to include PTL.

3.0 Development of Workgroup Report

The Workgroup considered and updated the draft Workgroup Report, noting some extra suggested changes for the Modification.

As National Grid preferred to include PTL within the scope of the Modification it was agreed that an interim report would be provided to the UNC Modification Panel in July, with a request for a two-month extension, until September 2020, with the ability to report back in one month.

The Workgroup reviewed all sections with the Workgroup Report. It was clarified that the text changes do not involve changes to the UNC, these changes are to the Moffat Interconnection Agreement and these will be published alongside the report.

The Workgroup reviewed the Relevant Objectives and suggested that the Proposer might remove positive impact on Relevant Objective b):

- b) Coordinated, 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.

This is because the Workgroup believed that the relevant gas transporters are GB gas transporters.

RH requested that when the Modification is updated it should mirror the changes discussed and recorded within the Workgroup Report.

4.0 Next Steps

RH confirmed that an interim Workgroup Report would be submitted to the July UNC Panel meeting with a request to extend the Workgroup until September 2020. Workgroup will look to review a further amendment to the Modification at the July meeting and if possible, look to submit the Workgroup report one month early to the July Panel if possible.

5.0 Any Other Business

None.

6.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Time / Date	Venue	Workgroup Programme
10:00 Friday 06 August 2020	Teleconference	Amended Modification to include PTL Completion of Workgroup Report
10:00 Friday 03 September 2020	Teleconference	Contingency Meeting for Completion of Workgroup Report

Action Table (as at 02 July 2020)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0601	05/06/2020	3.0	MM to provide an amended Modification incorporating Workgroup request for clarification on what GNI System Exit Demand specifically refers to and the solution where constraints occur.	(MM)	Closed