

## Stage 01: Proposal

# 0XXX:

## Amendment to the Enduring Annual NTS Exit (Flat) Capacity Application Processes

To increase the level of choice available to Users when applying for Enduring annual NTS Exit (Flat) capacity by enabling an adhoc application to request a Capacity start date beyond Y+4 up to Y+6 and an application within the July Application Window to request a non October start date.



The Proposer recommends that this modification should be sent directly to consultation



High Impact:  
Shipper Users, DN Users and National Grid NTS



Medium Impact:  
Insert name(s) of impact



Low Impact:  
Insert name(s) of impact

What stage is this document in the process?



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## About this document:

This document is a proposal, which will be presented by the Proposer to the Panel on 21 July 2011. The Panel will consider the Proposer's recommendation, and agree whether this modification should proceed to consultation or be referred to a Workgroup for assessment.



3 **Any questions?**

5 Contact:

6 **Joint Office**

6  [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

9  **0121 623 2115**

12 Proposer:

13 **Fergus Healy**

14  [Fergus.Healy@uk.ngrid.com](mailto:Fergus.Healy@uk.ngrid.com)

15  **01926 65 5031**

Transporter:


**National Grid NTS**

 ...@...

 **0000 000 000**

Xoserve:

**Insert name**

 [commercial.enquiries@xoserve.com](mailto:commercial.enquiries@xoserve.com)

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# 1 Summary

## Is this a Self-Governance Modification

National Grid NTS believes that this Proposal is a Self Governance Modification Proposal as it meets the following self governance criteria:

### Implementation

(i) is unlikely to have a material effect on:

- (aa) existing or future gas consumers; and
- (bb) competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes; and
- (cc) the operation of one or more pipe-line system(s); and
- (dd) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
- (ee) the uniform network code governance procedures or the network code modification procedures; and

(ii) is unlikely to discriminate between different classes of parties to the uniform network code/relevant gas transporters, gas shippers or DN operators.

## Why Change?

Users have indicated via UNC Workgroup 0376 that they wished to increase the choice that is available to them when applying for Enduring Annual NTS Exit (Flat) Capacity. Currently, Enduring annual NTS Exit (Flat) Capacity can be applied for during the Annual Application Window in July for an October year+4, Y+5 or Y+6 start date. If this does not meet the User's application date or first capacity date requirements then an adhoc application process can be used however the ad-hoc process is restricted to Y+4. Shipper Users have indicated that these limitations do not provide sufficient time or certainty to them and are an unacceptable risk when investing in a Power Station or Storage development.

## Solution

Users have indicated via UNC Workgroup 0376 they wish to see additional choice introduced to the Ad hoc Application Process and the Annual Application Window process with respect to Enduring annual NTS Exit (Flat) Capacity. This can be achieved through introducing the following changes into the UNC:

Ad hoc Application Process:

- Extend the time for applications from Y+4 to Y+6

Annual Application Window:

- Allow applications during the July Annual Application Window for start dates of the 1<sup>st</sup> of any month between October Y+4 and September Y+6 rather than the 1<sup>st</sup> October only.

## Impacts & Costs

National Grid NTS has requested a Rough Order Magnitude cost from xoserve to assess the system development costs of the above changes.



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Q: What is "The Annual Application Window"

A: In a Gas Year (Y) it is the period commencing at 08:00 hours and ending on 17:00 hours on each Business Day in July.

Q: What is "The Ad-Hoc Process"

A: An application for Enduring Annual Exit (flat) capacity may be made at any time between 1 October and 30 June in Gas Year (Y) where the application is new or exceeds 10 Gwh/day or is greater than 125 % of existing baseline

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## Implementation

The proposer believes that subject to the appropriate outcome, the Proposal could be implemented with immediate effect. However no specific implementation date is proposed.

## The Case for Change

Users have indicated during Workgroup 0376 that they required additional flexibility when applying for Enduring Annual NTS Exit (Flat) Capacity, in effect this proposal will enable Users to make well founded investment decisions as well as offering the flexibility for Users to tailor their capacity requirements closely to the date for which that capacity is required.

## Recommendations

The Proposer recommends that this Proposal should proceed to consultation at the same time as Modification Proposal 0376. The changes introduced as part of this Proposal have been discussed as part of Workgroup 0376.

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## 2 Why Change?



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Currently, Enduring Annual NTS Exit (Flat) Capacity can be applied for during the July Annual Application Window for capacity to be registered as held from 1 October in Gas years Y+4, Y+5 and Y+6. However, this October start date might not suit a User's development time lines both for the application date or the registered start date of holding capacity. This lack of flexibility in choice for any start date other than October may result in inefficient system investment and increased cost to customers because Users may be constrained to timelines that might not be suitable. For example, a Shipper User may prefer to commission a power station during the lower priced summer months when gas and power prices are less volatile than at the start of the winter period in October.

Changing the Enduring Annual NTS Exit (Flat) Capacity registered holding date to the first of any calendar month may result in more efficient network investment because capacity can then be delivered on the date it is required, thus capacity does not have to be paid for when it is not required and this will result in lower cost to their customers.

Developers and Users can also apply for Enduring Annual NTS Exit (Flat) Capacity using an ad-hoc process. However, the ad-hoc process is restricted in that a User cannot signal a Capacity start date that is later than the 1 October Y+4. This limitation does not provide sufficient time where the User wishes to provide National Grid NTS with a longer signal for their Capacity requirement to give National Grid NTS sufficient time to reinforce the network removing an unnecessary risk when investing in a Power Station or Storage development.

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## 3 Solution



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To provide more choice for Users when applying for Enduring annual NTS Exit (Flat) Capacity, the following changes to the UNC are proposed.

Ad hoc Application Process:

- Extend the time for applications from Y+4 to Y+6

Annual Application Window:

- Allow applications made during the July Annual Application Window for Enduring Annual NTS Exit (Flat) Capacity to be registered with effect from the 1<sup>st</sup> of any month in Gas Year Y+4, Y+5 and Y+6 rather than just the 1<sup>st</sup> October within each Gas Year.

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## 4 Relevant Objectives

Implementation is expected to better facilitate the achievement of **Relevant Objectives a, b, c, d, e and f.**

### Proposer's view of the benefits against the Code Relevant Objectives

Description of Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	Yes
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.	Yes
c) Efficient discharge of the licensee's obligations.	Yes
d) Securing of effective competition: (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.	No
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.	No
f) Promotion of efficiency in the implementation and administration of the Code	No



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### **Standard Special Condition A11 a). Efficient and economic operation of the pipe-line system.**

- Implementation of this Proposal would facilitate the provision of more accurate capacity requirements by Users. This would aid National Grid NTS to effectively plan the development of the Transmission system on a more economic and efficient basis.

### **Standard Special Condition A11 b). Co-ordinated, efficient and economic operation of (i) the combined pipeline system, and/or (ii) the pipeline system of one or more other relevant gas transporters**

- Enabling applications during the Annual Application Window for specified dates other than the 1st October is expected to result in more efficient investment by National Grid NTS and lower costs to customers. If Users can specify a non 1st October start date because this suits their development time frame then investment by National Grid NTS can be made on a more timely basis to meet the needs of the customer. This means that NG can invest "Just in Time" and costs can be minimised for customers because they do not have to pay for capacity during periods when they cannot make use of it. For example, a User wants to commission a CCGT starting in April. Currently a User would need to apply for Enduring Annual NTS Exit (Flat) Capacity to be registered with effect from the 1 October six months earlier than the date that is required. The User then has to pay exit capacity charges for those months even though they cannot use the

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Capacity. Thus, the proposed change would enable better facilitation of Relevant Objective (b).

**Standard Special Condition A11 c). Efficient discharge of the licensee's obligations**

- By extending ad hoc applications from Y+4 to Y+6, Users may give more advance notice to National Grid NTS of their capacity requirements. This increased notice should allow National Grid NTS to plan and invest in the network in a more efficient manner, undertaking activities at the most cost effective time and in the most efficient manner. This would therefore facilitate achievement of GT Licence obligations, enabling better facilitation of Relevant Objective (c).



## 5 Impacts and Costs



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### Costs

Include here any proposal for the apportionment of implementation costs amongst parties.

Indicative industry costs – User Pays	
Classification of the proposal as User Pays or not and justification for classification	
No system costs have been identified as part of this proposal	
Identification of Users, proposed split of the recovery between Gas Transporters and Users for User Pays costs and justification	
Not applicable	
Proposed charge(s) for application of Users Pays charges to Shippers	
Not applicable	
Proposed charge for inclusion in ACS – to be completed upon receipt of cost estimate from Xoserve	
Not applicable	

### Impacts

Impact on Transporters' Systems and Process	
Transporters' System/Process	Potential impact
UK Link	<ul style="list-style-type: none"> <li>None</li> </ul>
Operational Processes	<ul style="list-style-type: none"> <li>National Grid NTS may be required to amend its operational and planning processes</li> </ul>
User Pays implications	<ul style="list-style-type: none"> <li>None</li> </ul>

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> <li>No material impact</li> </ul>
Development, capital and operating costs	<ul style="list-style-type: none"> <li>Reduced Costs due to capacity being booked on a more efficient basis.</li> </ul>
Contractual risks	<ul style="list-style-type: none"> <li>Reduced due to Users being able to request variable start months via the annual application process</li> </ul>

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## Where can I find details of the UNC Standards of Service?

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In the Revised FMR for Transco's Network Code Modification **0565 Transco Proposal for Revision of Network Code Standards of Service** at the following location:  
<http://www.gasgovernance.co.uk/sites/default/files/0565.zip>

Impact on Users	
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"><li>• None</li></ul>

Impact on Transporters	
Area of Transporters' business	Potential impact
System operation	<ul style="list-style-type: none"><li>• None</li></ul>
Development, capital and operating costs	<ul style="list-style-type: none"><li>• More efficient development of the network due to capacity being signalled further in advance</li></ul>
Recovery of costs	<ul style="list-style-type: none"><li>• Not applicable</li></ul>
Price regulation	<ul style="list-style-type: none"><li>• None</li></ul>
Contractual risks	<ul style="list-style-type: none"><li>• None</li></ul>
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"><li>• None</li></ul>
Standards of service	<ul style="list-style-type: none"><li>• None</li></ul>

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	<ul style="list-style-type: none"><li>• Change to rules required</li></ul>
UNC Committees	<ul style="list-style-type: none"><li>• None</li></ul>
General administration	<ul style="list-style-type: none"><li>• None</li></ul>

Impact on Code	
Code section	Potential impact
UNC TPD B3.2.1	<ul style="list-style-type: none"><li>• Amend to reflect that a User may apply for Enduring Annual NTS Exit (Flat) Capacity from the 1<sup>st</sup> of any month within Gas Years Y+4, Y+5 &amp; Y+6</li></ul>
UNC TPD B3.2.4(a) (ii)	<ul style="list-style-type: none"><li>• Amend to reflect that a User may apply for Enduring Annual NTS Exit (Flat) Capacity from the 1<sup>st</sup> of any month within Gas Years Y+4, Y+5 &amp; Y+6</li></ul>
UNC TPD B3.2.4(b) (ii)	<ul style="list-style-type: none"><li>• Amend from Y+4 to Y+6</li></ul>
UNC TPD B3.2.10(c)	<ul style="list-style-type: none"><li>• Amend from Y+4 to Y+6</li></ul>

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Impact on UNC Related Documents and Other Referenced Documents	
ExCR	<ul style="list-style-type: none"> <li>Changes will need to be reflected in document</li> </ul>
Network Entry Agreement (TPD I1.3)	<ul style="list-style-type: none"> <li>None</li> </ul>
Network Exit Agreement (Including Connected System Exit Points) (TPD J1.5.4)	<ul style="list-style-type: none"> <li>None</li> </ul>
Storage Connection Agreement (TPD R1.3.1)	<ul style="list-style-type: none"> <li>None</li> </ul>
UK Link Manual (TPD U1.4)	<ul style="list-style-type: none"> <li>None</li> </ul>
Network Code Operations Reporting Manual (TPD V12)	<ul style="list-style-type: none"> <li>None</li> </ul>
Network Code Validation Rules (TPD V12)	<ul style="list-style-type: none"> <li>None</li> </ul>
ECQ Methodology (TPD V12)	<ul style="list-style-type: none"> <li>None</li> </ul>
Measurement Error Notification Guidelines (TPD V12)	<ul style="list-style-type: none"> <li>None</li> </ul>
Energy Balancing Credit Rules (TPD X2.1)	<ul style="list-style-type: none"> <li>None</li> </ul>
Uniform Network Code Standards of Service (Various)	<ul style="list-style-type: none"> <li>None</li> </ul>

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"> <li>None</li> </ul>
Gas Transporter Licence	<ul style="list-style-type: none"> <li>None</li> </ul>

Other Impacts	
Item impacted	Potential impact
Security of Supply	<ul style="list-style-type: none"> <li>Improved due to better facilitation of competition be better meeting customer needs</li> </ul>
Operation of the Total System	<ul style="list-style-type: none"> <li>None</li> </ul>
Industry fragmentation	<ul style="list-style-type: none"> <li>None</li> </ul>
Terminal operators, consumers, connected system operators, suppliers, producers and other non code parties	<ul style="list-style-type: none"> <li>Increased certainty and better matching of requirements for developer of NTS Exit Capacity</li> </ul>

## 6 Implementation

This Proposal can be implemented following a decision to so except during the Annual Application Process i.e. 1 – 31<sup>st</sup> July.



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## 7 The Case for Change



In addition to that identified the above, the Proposer has identified the following:

### Advantages

- Incremental Entry capacity applications benefit from flexible application dates and 1st of month start dates. This mod would better align Entry and Exit processes.

### Disadvantages

- Changes to the ExCR will be required.

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## 8 Legal Text

*Text, either suggested or formal, should be inserted at this point. The status of this text should also be stated.*

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## 9 Recommendation



The Proposer invites the Panel to:

- DETERMINE that Modification XXXX progress to Consultation at the same time as Modification Proposal UNC0376

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