

0539:

Removal of NTS Exit Commodity Charges for Distributed Gas

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This modification proposes revised distribution charging arrangements in respect of Distributed Gas such that transmission exit commodity charges are not applied.



Responses invited by 08 October 2015.



Low Impact:
Customers, Shippers, Transporters

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<p>This Draft Modification Report is issued for consultation responses, at the request of the Panel on 17 September 2015. All parties are invited to consider whether they wish to submit views regarding this modification.</p> <p>The close-out date for responses is 08 October 2015, which should be sent to enquiries@gasgovernance.co.uk. A response template, which you may wish to use, is at http://www.gasgovernance.co.uk/0539.</p> <p>The Panel will consider the responses and agree whether or not this modification should be made.</p>		Systems Provider: Xoserve														
<p>The Workgroup recommends the following timetable:</p> <table border="1"> <tbody> <tr> <td>Initial consideration by Workgroup</td> <td>28 July 2015</td> </tr> <tr> <td>Amended Modification considered by Workgroup</td> <td>n/a</td> </tr> <tr> <td>Workgroup Report presented to Panel</td> <td>04 September 2015</td> </tr> <tr> <td>Draft Modification Report issued for consultation</td> <td>17 September 2015</td> </tr> <tr> <td>Consultation Close-out for representations</td> <td>08 October 2015</td> </tr> <tr> <td>Final Modification Report published for Panel</td> <td>09 October 2015</td> </tr> <tr> <td>UNC Modification Panel decision</td> <td>15 October 2015</td> </tr> </tbody> </table>		Initial consideration by Workgroup	28 July 2015	Amended Modification considered by Workgroup	n/a	Workgroup Report presented to Panel	04 September 2015	Draft Modification Report issued for consultation	17 September 2015	Consultation Close-out for representations	08 October 2015	Final Modification Report published for Panel	09 October 2015	UNC Modification Panel decision	15 October 2015	 commercial.enquiries@xoserve.com
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1 Summary

Is this a Self-Governance Modification?

The Modification Panel determined that this is not a self-governance modification because it is expected to have a material impact on the transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

There was no consensus within the Workgroup as to the self-governance status of this modification, with some participants agreeing with Panel and others disagreeing as the impacts of this modification would have no material impact as the value of any rebate would be insignificant compared to DN revenue.

Why Change?

Transmission Exit commodity charges are applied in respect of all gas offtaken at Distribution Supply Points. Gas entered through Distributed Gas entry points does not use the Transmission system and so, to be cost reflective, Transmission Exit commodity charges should not apply to this gas.

Solution

It is proposed that the Distribution Transportation charging methodology in respect of Distributed Gas entry points is revised so that an additional rebate element, set as the level of Transmission Exit commodity charges, is provided.

Relevant Objectives

It is proposed that implementation of this modification would further Relevant Objectives a), b) and c).

Implementation

No implementation timescales are proposed. However, to be consistent with the timing of changes to transportation charges, 1st April 2016 may be a suitable implementation date.

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

There are no impacts on other industry change.

2 Why Change?

At present, NTS Exit commodity charges are applied in respect of all gas offtaken at Supply Points connected to Distribution Networks. Where gas is input into Distribution Networks at embedded DN Entry points, that gas will not physically enter the NTS and will utilise only the Distribution Network for transportation to the DN Supply Point - flows from DN Entry Points are currently far below the DN Network throughput and are forecast to be below this level for the foreseeable future. For such transportation of gas from DN Entry points to DN Supply Points it is not cost reflective for NTS Exit commodity charges to be applied since the gas does not physically utilise the NTS.

3 Solution

Since current transportation charging arrangements consider entry and exit separately and do not normally link entry at a location with exit at a particular Supply Point, the easiest manner to achieve the cessation of NTS Exit commodity charges for transportation from DN Entry points to DN Supply points is to provide a rebate at the level of the NTS Exit commodity charges for gas entered at a DN Entry point. NTS Exit commodity charges would continue to apply in respect of all gas offtaken at DN Supply Points while a rebate at the DN Entry point would offset the application of the NTS Exit commodity charges at the DN Supply Point, resulting in zero net exposure to the level of this charge for such gas flows.

The use of an entry commodity charge rebate in this manner is consistent with the established charging methodology, as approved by Ofgem and implemented through UNC Modification 0391.

It is proposed that the charging methodology is changed so as to introduce a commodity charge rebate for gas entered at DN Entry points. It is proposed that this commodity charge rebate is defined as being at the combined NTS TO and SO Exit commodity charge rates applicable at DN Supply Points, as amended by National Grid NTS from time to time. The DNs would not, therefore, need to set this rebate level nor give notice of its level since it is proposed that the charging methodology cross refers to the charge rates set by National Grid NTS, ensuring that the rebate would always be in line with the NTS Exit Commodity Charge rate.

Under this proposed modification, no new charge/rebate would be introduced –the level of the existing charge/rebate would be adjusted. There would thus be no implementation or additional ongoing costs associated with this modification.

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	This modification would not create or amend a User Pays service. Transporters need to ensure that invoice calculations reflect their obligations. This is a transporter responsibility and therefore it is not a User Pays modification. However, no implementation or additional ongoing costs are expected as a result of the modification since it would merely change the levels of the existing distribution transportation charges.
Identification of Users of the service, the proposed split of the recovery between Gas Transporters and Users for User Pays costs and the justification for such view.	<i>Not applicable</i>
Proposed charge(s) for application of User Pays charges to Shippers.	<i>Not applicable</i>
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.	<i>Not applicable</i>

4 Relevant Objectives

Impact of the modification on the Relevant Charging Methodology Objectives:	
Relevant Objective	Identified impact
a) Save in so far as paragraphs (aa) or (d) apply, that compliance with the charging methodology results in charges which reflect the costs incurred by the licensee in its transportation business;	Impacted
aa) That, in so far as prices in respect of transportation arrangements are established by auction, either: <ul style="list-style-type: none"> (i) no reserve price is applied, or (ii) that reserve price is set at a level - <ul style="list-style-type: none"> (I) best calculated to promote efficiency and avoid undue preference in the supply of transportation services; and (II) best calculated to promote competition between gas suppliers and between gas shippers; 	Not applicable
b) That, so far as is consistent with sub-paragraph (a), the charging methodology properly takes account of developments in the transportation business;	Positive
c) That, so far as is consistent with sub-paragraphs (a) and (b), compliance with the charging methodology facilitates effective competition between gas shippers and between gas suppliers; and	Positive
d) That the charging methodology reflects any alternative arrangements put in place in accordance with a determination made by the Secretary of State under paragraph 2A(a) of Standard Special Condition A27 (Disposal of Assets).	Not applicable
e) 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.	Not applicable

The proposed distribution charging methodology change takes account of the fact that gas from DN Entry points does not physically enter the transmission system. It is therefore more cost reflective that the net transportation costs for transportation of gas from such DN Entry points to DN Supply Points does not include any transmission charging element.

The proposed distribution charging methodology change takes account of the ongoing development of Distributed Gas.

The proposed charging methodology change would result in a reduction in the cost of transportation for gas sourced through DN Entry points and thus may facilitate the enhanced development of such gas sources which could in turn better facilitate effective competition between gas shippers. In addition, improving costs reflectivity supports the development of effective competition.

The proposed modification does not conflict with paragraphs 2, 2A and 3 of Standard Special Condition A4 of the Transporter's Licence since any change in charges would be applied based on the methodology prevailing at the time.

Some participants consider this modification would have a negative impact on relevant objective a) as it is not reflective of the costs to be incurred by Distribution Networks for administering the rebate.

Some consider the use of the DN regime to affect an NTS rebate based on an NTS charge, is in principle distorting DN price reflectivity.

5 Implementation

No implementation timescales are proposed. However, to be consistent with the timing of changes to transportation charges, 1st April 2016 may be a suitable implementation date.

Note:

- It is assumed that should this modification be implemented, notice would be included in the January 2016 Notice of Revised LDZ Gas Transportation Charges.
- Transporters advise that this modification would have limited implementation costs.
- Distribution Networks would need to refer to the applicable NTS Exit commodity charges within their own charging statements.

6 Impacts

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

There are no impacts on other industry change.

Impact Assessment of issues raised under Modification 0508

The rationale for withdrawing the modification was documented and published at:
<http://www.gasgovernance.co.uk/0508>

The key points of challenge outlined in the previous report, which were reconsidered by this workgroup, were:

2.1 No NTS Service for DN Embedded Entry flows - *Gas entered into the Distribution Pipeline System at Distributed Gas Entry Points does not benefit from any NTS service and therefore should not bear any associated cost;*

Some participants offered the opinion that, as gas does not flow from DNs into the NTS, Distributed Gas does not directly benefit from any NTS service and should not bear any NTS costs.

2.2 Robustness of Regime - *That the regime for determining and applying the rebates should be robust;*

Some participants consider that as the regime is not proposing to determine a rate and that it would use a rate published by National Grid NTS for the rebate, the regime is robust.

Some participants questioned whether this charge provides a service, which DN Entry sites benefit from. If they benefit then the full rebate may not be appropriate. It was noted that the vast majority of NTS Exit commodity costs were compressor costs indicating that most of the rebate should be given.

2.3 Distributional Impacts - *The rebates provided by GDNs at the Distributed Gas Entry Point would be reflected to customers downstream.*

Some participants offered the view that this modification would not create subsidies as it proposes to redistribute costs for better cost reflectivity; leading to a fair allocation/distribution of charges across the different customer types. Overall Transporter's allowed revenue would not change, the net bill to Shippers would remain unchanged as it simply reapportions costs across the market. This would be no different to any charge or methodology review.

Some participants consider the materiality of the proposals in this modification were so small an impact that they would be lost in rounding in the DN revenues. It was also noted that the methodology could be revisited if it was deemed no longer appropriate.

National Grid Distribution estimated that the impact of distributed gas would be 0.18% of their revenues by 2020, allowing sufficient time to put in place amended arrangements should the materiality increase in future years and that this modification has a low impact on the medium term planning horizon.

7 Legal Text

Text Commentary

Amendments have been made to UNC TPD Section Y to reflect the modifications intention in providing DN Entry Points with a rebate of the TO Exit (Flat) and SO Commodity NTS charges. This has been carried out by including this value within the current value invoiced to DN Entry Points (the total can be a credit or debit) as it was felt that this was the most efficient way to incorporate this into legal text.

Text

The Text published alongside this report has been prepared by Scotia Gas Networks, and no issues were raised by the Workgroup regarding its content.

8 Recommendation

The Panel have recommended that this report is issued to consultation and all parties should consider whether they wish to submit views regarding this modification.

Panel ask that respondents provide clear views and supporting evidence on the self-governance status identified in Section 1 of this report focusing, in particular, on whether they believe this proposal is likely to have a material impact upon competition in the shipping, transportation or supply of gas.