

Amend obligation for the acceptance of EPDQD revisions made after D+5

Transmission Workgroup

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What?

- UNC states that no revisions to EPDQD will be made after D+5
- National Grid NTS proposes the removal of this obligation;
 - so EPDQD amendments can be accepted after this timescale,
 - and the inclusion of a new reporting obligation for revisions submitted after D+5.

Why?

- National Grid NTS accepting late EPDQD revisions to ensure accurate shipper allocations
- If National Grid NTS risks enforcement action if they continue to accept late revisions without amending code
- If National Grid no longer accepts late revisions and enforces D+5, this will have an adverse impact on shipper allocations
- Therefore National Grid needs to continue accepting these late revisions and the UNC needs to be aligned to current practices.

How?

- Amend paragraph E 1.4.2 of UNC;
 - Obligation in code for amendments after D+5 to not be accepted will be removed,
 - Will be replaced with a requirement for amendments submitted after this timescale to be subject to a reporting obligation.

Legal Text – TPD Section E

1.4 System Daily Quantities: Entry

- 1.4.1 In respect of each System Entry Point, the "**Entry Point Daily Quantity Delivered**" is the aggregate quantity of gas delivered to the Total System on a Day at that System Entry Point, ascertained as described in Section I2.5 (subject to paragraph 1.7.1).
- 1.4.2 The amount determined to be the Entry Point Daily Quantity Delivered in respect of any System Entry Point for the Gas Flow Day may be revised at any time:
- a) up to and including the 5th Day following the Gas Flow Day;
 - b) after the 5th Day following the Gas Flow Day and up to (but not after) the Entry Close-out Date if the Transporter is provided with:
 - i. the identity of the System Entry Point;
 - ii. the Gas Flow Day in question;
 - iii. a reasonably detailed explanation of why such revision was not made in accordance with (a) above;
 - iv. any other information in connection with the revision as the Transporter may reasonably require; and
 - v. the consent of the person providing information under this paragraph (b) to the publication of that information by the Transporter
- ~~up to and including the 5th following Day, but no revision will be made to such quantity after the 5th Day after the Gas Flow Day.~~
- 1.4.3 In respect of the Total System the "**Total System Daily Quantity Delivered**" is the aggregate quantity of gas delivered to the Total System on a Day, determined as the aggregate of the Entry Point Daily Quantities Delivered for all System Entry Points.

Justification for Self-Governance

- Changes would codify current practices, but with addition of reporting requirement for late amendments
- Unlikely to have a material effect on competition in the shipping, transportation or supply of gas conveyed through pipes, the UNC governance procedures or the network code modification procedures
- Could result in a positive effect on consumers;
 - Incentivises accuracy of data in a timely manner,
 - accurate data results in more accurate costs.

Justification for Proceeding to Consultation

- Change ensures that UNC codifies current practices
- Feedback received from sub-terminals, shippers and the CVA shows that they support the continuation of current practices
- Main parties impacted by this change are sub-terminals, and other entry-points submitting late amendments, who are not party to the UNC.
- These non-UNC parties have been offered the opportunity to provide feedback through a questionnaire or telephone interview, with responses received from 11 sites.

Conclusion

- We would welcome your comments on;
 - The proposed legal text,
 - Identification as self-governance,
 - Proposal to move directly to Consultation after Panel.