Transmission Workgroup (Issues) Minutes
Tuesday 01 May 2012
31 Homer Road, Solihull B91 3LT

Attendees

Tim Davis (Chair)	(TD)	Joint Office
Lorna Dupont (Secretary)	(LD)	Joint Office
Bethan Winter	(BW)	Wales & West Utilities
Charles Ruffell	(CR)	RWE npower
Chris Wright	(CW)	Centrica
Claire Spedding	(CS)	National Grid NTS
Dave Adlam	(DA)	National Grid Distribution
David Mitchell	(DM)	Scotia Gas Networks
Derek Jamieson	(DJ)	ESBI
Elaine Calvert	(EC)	National Grid NTS
Erika Melen	(EM)	Scotia Gas Networks
Gerry Hoggan*	(GH)	ScottishPower
Glenn Bryn-Jacobsen	(GBJ)	National Grid NTS
Graham Jack	(GJ)	Centrica
Grant McEachran*	(GM)	Ofgem
Iain Morgan	(IM)	Ofgem
Jeff Chandler*	(JC)	SSE
Julie Cox	(JCx)	Energy UK
Mark McKenzie	(MM)	National Grid NTS
Mike Wassell	(MW)	National Grid NTS
Natasha Ranatunga	(NR)	Ofgem
Phil Pyne	(PP)	National Grid NTS
Rekha Theaker*	(RT)	Waters Wye Associates
Richard Fairholme	(RF)	E.ON UK
Rob Cameron-Higgs	(RCH)	Wales & West Utilities
Steve Fisher	(SF)	National Grid NTS

** via teleconference*

1. Introduction

Copies of all papers are available at www.gasgovernance.co.uk/tx/010512.

TD welcomed attendees to the meeting.

2. Review of Minutes and Actions from the last meeting

2.1 Minutes

The minutes were approved.

2.2 Actions

TR0101: Network flexibility - Provide evidence (data) to demonstrate that network usage is changing and will continue to do so, and that regime change is needed to accommodate this.

Update: Presented - see 3.2 below. **Closed.**

3. Issues

3.1 Aligning the connections and capacity processes

Presentation 1: Business Plan Summary

PP gave a presentation.

Changing Operational Environment

Drivers for change were outlined and illustrated, including changing sources of supply, decarbonisation of electricity generation, new environmental legislation, approaching obsolescence of existing assets, changes in user behaviour, and the changing European regulatory environment.

Business Plan March 2012 Submission

Baseline Plan expenditure together with the proposed responses to manage risk and uncertainty was illustrated. The vast majority of ex ante funding is not included in Capex and PP explained why this was so. The mechanisms proposed will adjust the Baseline Plan within the credible range. The proposed process for dealing with the Network Flexibility Uncertainty Mechanism (UM) was reiterated.

PP briefly explained the RIIO framework, pointing out that Ofgem's proposal was to run a Price Control Finance Model each November to calculate the following year's revenue. An illustration of TO Revenue forecast was provided, and PP observed that 72p going into RAV and 28p into 'fast money' would give a 'spike'. This had been revised to give a split cap rate, which lowers the peak in the allowed revenues (capitalising 90% of any incremental spend). The combined effect flattens the profile. GJ questioned if National Grid NTS would obtain a higher level of revenue as a consequence.

Suggested Developments

It was recognised that there were a number of areas in need of further discussion and agreement to support the necessary changes to the UK gas industry, and that it was appropriate to take advantage of this opportunity to change and better align the regulatory and commercial regimes in parallel to maintain their fitness for purpose. Attention was drawn to the need to review Neutrality as in the evolution of a more dynamic network it would seem more appropriate to consider Entry and Exit as a single entity. Charging methodologies would not be considered through a price control review process.

Views were sought on the proposals. Responding to a question from JC, EC confirmed that a recap of 100% rather than 90% had ben considered but discounted; there was a need to get 'fast money' through to support cash flow and fund the initial construction phase. EC confirmed that financial ratios were being looked at.

Presentation 2: Business Plan - Arrangements for Incremental Capacity

EC gave a presentation, reiterating the main drivers for regulatory and commercial change. Attention was drawn to certain key points to be borne in mind. EC confirmed that National Grid NTS was not proposing to change the commercial regime around baseline, or make any changes before April 2013. However, developments within Europe may force a revision of assumptions at some point.

The key principles for capacity release were outlined, together with the proposed regulatory and commercial changes. EC asked for views. GJ pointed out that more detail was required; parties needed to see what sort of services National Grid NTS will be offering and any improvements, ie making capacity available more quickly, and may be reviews of National Grid NTS' planning.

EC explained that 2 build seasons were required to deliver the construction, and National Grid NTS did recognise that this may need to be done more quickly. RT questioned what the effect would be, of reducing obligated lead times to release incremental capacity to Y+2, on charging? EC responded that signals are already provided and SO incentives (TPCR3 and 4 rules) will continue. GJ asked if there was any reason it was restricted to an October start date. EC responded the October deadline was used as a default (It was when most parties asked for capacity to be delivered). PP added that National Grid NTS need to be able to flow the output from this into Ofgem's financial model for November – allocation was therefore needed in October.

JCx did not believe this to be consistent with the principles of Modification 0376, which allows signals to relate to different times. EC responded that if delivery to a different point was valued by customers then National Grid NTS would respond to that. It takes some months to be able to start and mobilise the work; there is a natural cut-off, ie need to know that work can start in the March.

JCx was concerned that there seems to be an underlying assumption that work can only be done in the summer – 'the build season' – and this was not driven in a very customer-focused way. Maybe the default ought to be April, enabling commissioning and storage ready for the winter.

GJ observed that from a User's perspective it would be useful to have more flexibility – October could be prohibitive depending on the requirements of a plant.

MM pointed out that the financeability question was quite key for National Grid NTS; if there was no trigger provided by the November model, it would have to bear any costs (cost of capital) until the next year's model. JCx suggested that this needed looking at more closely; if it involved many projects at once it could potentially present difficulties in financial terms, but she saw no reason why everyone should be constrained by an October deadline. PP indicated that there might generally be a relatively modest cash flow issue, but there may be heavier implications as similar signals may drive significantly different investment requirements.

Referring to Incentives, JC commented there seemed to be a lack of choice for industry as opposed to Modification 0376. Certainty on start dates for developers was somewhat lacking. CW asked what was happening to Incremental lead times. EC explained how National Grid NTS was trying to keep both parts of a project on track without lengthening the process, although some things were outside its control. CW observed that it sounded rather less certain at the front end of the process than currently was the case. EC commented that a more fixed leadtime might come with more experience of the process, and National Grid NTS was trying to build in more flexibility where appropriate. GJ

pointed out that if the first part was not conducted properly it may be problematic, and he would like to see something that drives performance on both parties. CS explained what was proposed in terms of potential incentives and increased transparency.

Referring to the setting of principles, GJ stated that he would prefer not to start with a worst-case scenario. EC said that it was very difficult to put an incentive around the pre-planning stage. GJ indicated there would be a need for absolute transparency and reasonable expectations on both sides. RF commented that it seemed to be assumed that everything is worst-case and thus IPC, but projects may go through local planning and he asked would capacity then be available sooner? EC said it depended on the sort of project, so parts of the process could be longer/shorter. Reasonable endeavours were proposed to shorten/report on these timescales, and it was proving very difficult to devise a 'one size fits all' regime. She was not sure that permits were the best way forward. DJ added that there should be clarity and visibility to make timescales as short as possible, and there would be a need to see what timescales might actually be over different scenarios. A case-by-case process seemed the right way forward, but mechanisms and expectations needed to be fully understood. EC agreed that timely exchange of information between both parties was critical to achieve as much certainty as possible.

CS indicated that National Grid NTS was trying to keep flexibility in the first part of the process; the earlier parties were tied in the less certainty there seemed to be, and there was a desire to provide appropriate 'break-out' points. DJ asked how the question of long lead-time items would be approached. EC responded that some commitment from the parties involved would be expected, but if items were not used they might potentially go into a stock for future use. More customer-focused ways were being considered, that avoided extending timescales by not ordering or being ready.

EC confirmed there were no changes to QSEC etc for baseline, and there were no plans to change any of the lead times or existing processes for capacity.

Moving on to a process to release incremental capacity, EC said that in responding to feedback received from customers, consideration had been given to a split auction, and went on to explain two models, with a brief discussion ensuing. EC believed this phased approach to be more credible. GJ asked if there was any reason why baseline should not be released earlier – could National Grid do better at Exit and should it have discretion at that release. MW and SF noted this suggestion for further consideration.

TD summarised that customers just want capacity, and are not concerned whether it is baseline or incremental, obligated or non-obligated.

MW acknowledged the need to develop a generic PCA for discussion.

RF indicated that customers would have concerns relating to Terms and Conditions. It would need to be made clear to the customer what the implications might be of buying/not buying capacity at appropriate points.

EC confirmed that there would be phased commitment points in the PCA and certain 'break-out' points; a set of principles and a generic agreement were being worked up and would be shared.

It was confirmed that non Users can sign the PCA, but there will be a point at which the non User will need to appoint a Shipper to make the capacity commitments to keep the project on track. National Grid NTS will also need to demonstrate to the customer that it has carried out the required activities. Assuming that both documents were presented at the same time, RF suggested that 3 months would be a reasonable window in which to sign both.

The processes to release incremental capacity (both with and without the requirement for major planning consent) were described and illustrated. Depending on the complexity there could be more User commitment points within the process. JCx queried the second one – calling it a User commitment point was confusing if it was supposed to be a 'check point' only.

How much is charged to the individual or socialised will be a discussion for the NTSCMF; the need to tread carefully so as not to create barriers to entry was recognised. There were various ways of securitising but it would be for NTSCMF to consider the appropriate mechanisms.

Responding to a question from TD, NR confirmed that the November model date was fixed. IM added that most charges would be on a known basis, however if there was significant debate that indicated majority views against this the position would be reviewed and reconsidered.

RF was concerned that there was misalignment with the customer processes, suggesting that the PCA comes later in the process and explained what would happen under Modification 0373. EC observed that there was a sequential process for National Grid NTS. GJ suggested that some timescales should be applied to clarify this. There was a brief discussion on the efficient use of resources at various points in the process when no great degree of certainty was apparent.

EC asked IM if there should be socialised charges to deal with pre-planning activity. IM responded that he was not endorsing proposals at present; further input from stakeholders was required before Ofgem would formulate a view, and referred to customer feedback that commercial discussions would have been of more benefit before the submission of the proposals. More input would be required before October to enable assessment as quickly and as efficiently as possible. An understanding of the impacts will be required and the arguments regarding the starting point. Ofgem is aware that Modification 0373 was being developed and one of the challenges in the assessment will be to identify consistency in the arrangements.

RF believed it to be evident that National Grid NTS did not favour carrying out the planning activities before any formal signing, and referred to the electricity model, questioning why parties should not do things earlier and share planning costs, thereby potentially reducing timescales by a couple of years. CS pointed out that overt external engagement on what were initially speculative enquiries might not be the best approach when considering reactions of local communities to potential change. MM added that a formal commitment would be required to commence external engagement.

Responding to a question from CW, EC explained the opportunities for substitution and the implications; this needs to feed into part of the PCA discussions. The Planning Inspectorate could easily challenge if not 'fully justified'. National Grid NTS was seeing this as a far more collaborative process and will engage to point out potential opportunities to the customer. Collaborative working must be in greater evidence to external parties. CW observed that he could see all sorts of problems at Entry, so it would have to be a very robust process with no loopholes. EC added that it was obviously more complicated where multiple parties were involved, and there would need to be certain points at which a decision must be made in order to move forward and give sufficient comfort/guarantees about capacity and this will be accessed/provided. DJ agreed that there needed to be some assurance very early in the process that infrastructure and capacity will be there, and that there were sensibly timed breakout points. EC pointed out that from a standing start there may be times when it is actually impossible to meet obligated lead-times

and this should also be recognised. GJ suggested that there might be a wider scope for the earlier release of capacity at entry, and perhaps parties could be approached and asked if they would be willing to release some. He went on to question if the current rules were actually inhibiting National Grid NTS from being as flexible as they potentially could be – sensibly widening the degree of flexibility may avoid potentially unnecessary investment, and perhaps this should be considered. SF agreed this was worth further consideration.

Where major planning consent was not required there was less time to deliver the capacity, and the timescales are therefore compressed. 'One size fits all' was not necessarily appropriate going forward.

The stages at which revenue drivers might be invoked were discussed. As in the Business Plan, a 7 year phasing was used for pipelines; the assumption was 2 build seasons and a year's aftercare. EC explained the worked examples, observing there was a need to offer capacity at a point that gives certainty to all parties whilst looking at efficient levels of investment and trying to achieve the optimum balance between constraint costs and investments. RF observed that the attendance at this meeting indicated there was much active interest in achieving improvements in the process.

EC summarised the revenue driver funding treatment. JC questioned what the cost of capital would be to support the business. Picking up an earlier point, PP answered that, without appropriate funding, it was potentially an extra 1.2% on top of the cost of capital (from 7.5% to 8.7%).

Attention was then drawn to charging implications.

EC indicated she would be happy to be contacted if further questions arose following the meeting.

Presentation 3: Developing the Connections and Capacity Processes – Commercial Changes

MW gave a presentation, indicating that the focus was to be on the potential commercial regime that may need to be adopted, the seeking of the industry's views as to what was viable, and the identification of any concerns or alternatives.

The key principles of potential change were reiterated, and the high level proposed changes were outlined (including Baseline release, substitution, incremental release and transitional arrangements) and these were then discussed. MW clarified 'incremental' and 'associate'.

JCx questioned how it would all fit together- should the Pre Capacity Agreement (PCA) be signed first or should a party seek to obtain a bit of capacity here or there first? MW responded that signing the PCA first was the best guarantee. EC added that it is a change to the Exit products, creating an incremental product in effect, and definitions in the UNC may have to change. JCx commented that this might result in 3 sorts of long-term exit capacity. Responding to a question from TD, MNW confirmed that a process would be required for all Entry/Exit capacity.

Concerned that there were lot of issues within these areas, JCx indicated that further thought was required (especially given baseline levels that were too high). GJ suggested a resetting of User Commitment (UC) at appropriate points (splitting out proposes a potentially higher UC?) The potential for a mismatch between baseline and incremental was noted by MW. It was suggested that National Grid NTS consider sourcing capacity through 'surrender' from other parties, ie develop a 'surrender process'.

Action TR0501: National Grid NTS to develop more detailed Connections and Capacity processes (commercial changes, pros and cons) for review and discussion.

Attention was drawn to other considerations that might need to be taken into account as developments progressed. Was the NPV test still an appropriate economic test? TD asked if there were any alternatives being suggested. JC did not see a problem with the NPV test as it currently stands. CW suggested adding some sort of certainty to indicate that a party/parties had passed an NPV hurdle. MW believed that this might be covered under a PCA or be managed through bi-lateral discussions with multiple parties.

The discussion then moved on to consider Substitution. MW confirmed that the retainer process has been used. GJ queried if there was potential for discrimination regarding how exit capacity was to be made available to different Users. PP referred to the retainer process as providing protection, but noted that there has to be a point at which a party must buy or release capacity. GJ believed that more thought should be given to Exit User Commitment and avoiding sterilising capacity and suggested that some examples would help to clarify the position. JC agreed that more detail was required and worked examples would be very beneficial to aiding understanding.

Action TR0502: National Grid NTS to provide more detail and worked examples of how exit capacity was to be made available in different circumstances.

Proposed key changes in respect of incremental release were then explained and discussed. GJ questioned if the moratorium would be removed and MW noted this for consideration. GJ went on to suggest splitting products. Responding to a question from NR, MW confirmed that incremental would be restricted to PCA signatories. NR pointed out that some changes were to be expected resulting from developments in the European regime and that reconsideration might therefore be necessary in the future. JCx believed this would not be inconsistent with European developments that had been indicated so far.

MW observed that a sensible industry-agreed solution was required to manage transitional projects. JCx asked what buyback costs would be, and EC indicated that work was being carried out in this area. EC indicated that the modelling of potential buyback is relatively simple but ascertaining the costs is more difficult. Should there be a cost per unit per connectee? What were the views on market price? What is an appropriate charge to put in the modelling? JCx suggested a range of numbers, or perhaps a scaleable option.

Action TR0503: National Grid NTS to provide more detail and worked examples of the incremental processes and management of any transitional requests/arrangements.

Attention was drawn to other considerations across other areas that might need to be taken into account as developments progressed, and views were sought. Questioning the need for ARCAs in the future, MW reiterated that a PCA does not actually reserve capacity – it gives an indication of when capacity might be available. RF commented that there did not seem to be much of a transition period. JCx thought this would apply to any project with consent. EC commented there might not be any commitment behind the capacity bookings. CS believed that this might be able to be agreed through works agreements. PP pointed out that the external consultation for National Grid NTS is more onerous and has not started yet.

Next Steps

National Grid NTS will seek to provide more details on:

- Alignment of capacity and connections
- Long term "non-firm"
- Substitution – introduction of a substitution "reserve" for Entry and Exit and an Exit "retainer"

TD pointed out that a draft modification can often help to clarify what was required and MW will consider what should go into a draft modification concerned with the alignment of capacity and connections.

Views were sought on whether April 2013 implementation seemed achievable; Shippers were not sanguine in respect of this and a reluctance to provide a more positive response indicated that more clarity was required. JCx commented that Price Control deadlines should not drive this – it was better to get it right

CW asked for a clear indication on when discussions on the charging elements might take place. MW believed these needed to be worked up in parallel with any modification and a PCA. He indicated that a PCA might be referred to in the UNC but may not form part of it, however RF countered that Shippers might prefer to see this as part of the UNC to give transparency and certainty to its governance.

It was suggested that a meeting around mid-June should be arranged assuming a draft modification has been developed by that time.

Presentation 4: Business Plan - Incentives

CS gave a presentation on the development of SO Incentives in relation to timely connections and constraint management, and highlighted three potential new areas for incentivisation (maintenance, capacity scaleback, and provision of enhanced services for NTS users). A brief discussion ensued.

RF commented that the timescales were not the most challenging at present but was conscious to see how it works out with at least 6 months experience, before spending any money on further adjustment. JC agreed with RF and JCx added that she thought it rather premature for consideration of any incentive, pointing out that if National Grid NTS believed it could do better at this early stage then it should automatically demonstrate that in its performance.

Discussing pre-capacity application delivery, it was agreed that some reporting might be required but at this stage it was too early to decide on what might be most appropriate.

Discussing post-capacity application delivery, it was questioned which party would pay the incentive and which party received the penalty. It was believed there should be more flexibility rather than solely be predicted in the October model, and until a view on that was established it was not possible to conclude what, if anything, might be appropriate. JC commented that he would support something that gives more flexibility.

All sorts of questions might arise in this area - could a developer pay National Grid NTS to accelerate the process? Who bears the risk? How would such an option if exercised affect other projects? Were there issues of transparency? Were there opportunities for 'playing the system'? Should the industry be paying for something that only one party might benefit from?

TD commented that the view appeared to be that National Grid NTS should not be incentivised to deliver what the customers want if it has been asked for in good time.

PP commented that, for example, 2 runs of the finance model in a year would impact allowed revenues and potentially affect charges.

RF suggested that a fixed date should be included in the connection agreement rather than having complex incentives.

Moving on to the consideration of constraint management, CS indicated that this was trying to keep it in line with Exit.

Looking at the potential new areas for incentivisation, GJ suggested it was a waste of time discussing incentives related to maintenance as long as what was in UNC TPD L4.1.3 remained unchanged. RF pointed out that maintenance should be a '7 days a week' activity, and not just a Monday-Friday activity as was currently the case. This was 'a missed opportunity' for National Grid NTS who should be responding to their customers' needs, ie a requirement for 24/7 and weekend maintenance. It was hard to measure any incentive for this. Better communication was required and the ability to do maintenance at weekends when there was less demand on the system. EC asked if this should be valued as 'an extra service' and attract an incentive; currently the concept of weekend working was not taken into account.

JCx commented that EC had given a lot more detail in today's discussions than was present in the documents that the industry was currently trying to formulate responses to, and pointed out that the eventual responses may not therefore reflect what is actually required. She added that she was currently obliged to put in "Not enough information.' In many sections as the lack of detail makes it really hard to give responses of any real value.

RF commented that he had not seen any firm proposals regarding maintenance and yet Shippers come to meetings and clearly indicate what they want.

GBJ then presented on the area of capacity scaleback, and the restoration of curtailed rights was discussed. MW confirmed that there were instances of restoration once it has been scaled back. RF believed it was very hard to police, as it was very much discretionary subject to the perceived balance of risk to National Grid NTS. JCx thought it very difficult to ascertain a value.

Summarising views on this, TD noted that the proposals were not warmly welcomed by those present, and suggested that GBJ give further consideration to this area.

CS concluded the presentation with a consideration of the provision of enhanced services, and these were briefly discussed. DJ suggested that provision of higher gas pressures could also be considered as a useful additional service.

CS confirmed that there were no current constraints so there was no perceived value at present, but there could be in the future. RF believed not; if Shippers want it they can progress appropriate modifications themselves to initiate these areas. JCx agreed with RF's view.

3.2 Network flexibility

Presentation 1 – Flex information

In response to Action TR0101 (Provide evidence (data) to demonstrate that network usage is changing and will continue to do so, and that regime change is needed to accommodate this.) GBJ presented various graphs on the capability of the system (trend and directions).

Attention was drawn to slide 2, which demonstrated the huge disparity between the information on supply at the beginning of the Day and the eventual balance at the end of the Day. The import of the information indicated by the graphs was discussed as the presentation progressed.

There could be a 30m mismatch during the Day between supply and demand. Incursion into and loss of linepack affects pressures and how National Grid NTS is able to respond to other industry parties. It brings operational challenges, even if it is seen to be 'good' for the wider market. The range within which National Grid NTS is able to manage the pressures is finite, and compressor usage can be quite heavy at times to cope with the position. It also affects planning and maintenance. Correlation between demand and flows, and the view of what assets are needed in the ground, appears to be disappearing, and it is becoming increasingly complex to establish a true view. It is becoming more evolutionary and National Grid NTS' interventions may become more apparent as it gets closer to the 'tripping point'. National Grid NTS was questioning at what point does it become insufficient for System Operations (SO) to try and manage, and a regime change becomes necessary?

Nomination positions were discussed. If it was noticed that these were off mark and there were large imbalances, or there was 'odd' behaviour, National Grid NTS does contact the originators(s), but if all is flowing as nominated there could still be an imbalance. CW questioned if there was an extra cost for Shippers in the continual reconfiguring by SO. GBJ indicated there was a cost associated with running the compressors but not huge; the question was more along the lines of had the industry reached the boundaries where it could/should no longer expect SO to manage this increasingly volatile position when an imbalance could be so large it would have to go to market, or it cannot manage the pressures.

CW pointed out that until the root of the problem could be identified it was hard to know what the best and most efficient solution might be.

Presentation 2: Customer Requirements within RIIO-T1 Period - Update

MW gave a presentation, recapping on the scope for new products. Responding to the feedback from the previous meeting, National Grid NTS will progress amendments to the OCS/OPS process via the Offtake Arrangements Workgroup; current National Grid NTS thinking was to formalise the offline process run in 2011 incorporating seasonal pressures/flex. A 'strawman' was under development. National Grid NTS will hold bi-lateral discussions on NTS Entry Ramp Rate and Notice Period products with interested parties and will keep the Workgroup informed of developments in this area.

Next Steps

It was agreed to close this Issue, and National Grid NTS will continue monitoring and reporting and will provide updates on Flex as appropriate.

IM urged those present to consider the principles and what they meant in terms of the Price Control.

4. Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/Diary

The next Transmission Workgroup meetings are scheduled as follows:

10:00 03 May 2012, at ELEXON, 350 Euston Road, London NW1 3AW

and subsequently

10:00 on the first Thursday of each month, at ELEXON, 350 Euston Road, London NW1 3AW

EXCEPT (in light of the Olympic Games):

10:00 02 August 2012, at National Grid, 31 Homer Road, Solihull B91 3LT]

Action Log – UNC Transmission Workgroup (Issues): 01 May 2012

Action Ref	Meeting Date(s)	Minute Ref	Action	Owner	Status Update
TR 0101	31/01/12	2.2	Network flexibility - Provide evidence (data) to demonstrate that network usage is changing and will continue to do so, and that regime change is needed to accommodate this.	National Grid NTS (PG)	**Closed**
TR 0501	01/05/12	3.1	National Grid NTS to develop more detailed Connections and Capacity processes (commercial changes, pros and cons) for review and discussion.	National Grid NTS (MW/EC)	
TR 0502	01/05/12	3.1	National Grid NTS to provide more detail and worked examples of how exit capacity was to be made available in different circumstances.	National Grid NTS (MW/EC)	
TR 0503	01/05/12	3.1	National Grid NTS to provide more detail and worked examples of the incremental processes and management of any transitional requests/arrangements.	National Grid NTS (MW/EC)	