

UNC Workgroup 0501/0501A/0501B/0501C Minutes
Treatment of Existing Entry Capacity Rights at the Bacton ASEP to
comply with EU Capacity Regulations
Thursday 11 December 2014
at Eni House, 10 Ebury Bridge Road, London SW1W 8PZ

Attendees

Bob Fletcher (Chair)	(BF)	Joint Office
Mike Berrisford (Secretary)	(MB)	Joint Office
Andrew Corkhill	(AC)	Eni
Anthony Miller	(AM)	Centrica Storage
Anna Shrigley	(AS)	Eni
Danielle Stoves	(DS)	Interconnector UK
David McCrone	(DM)	Ofgem
Debra Hawkin*	(DH)	TPA Solutions
Fergus Healy	(FDH)	National Grid NTS
Graham Jack	(GJ)	Centrica Energy
Greyham Davis	(GD)	National Grid NTS
Matthew Hatch	(MH)	National Grid NTS
Nick Wye*	(NW)	Waters Wye
Richard Miller	(RM)	Ofgem
Simon Witter	(SW)	Eni

*via teleconference

Copies of all papers are available at: <http://www.gasgovernance.co.uk/0501/111214>

1. Introduction and Status Review

Opening the meeting, BF thanked Eni for kindly hosting the meeting at their London Office.

1.1 Minutes

RM provided a brief overview of his proposed amendments to the previous meeting minutes (28 November) during which no one present raised any concerns. Thereafter, the minutes of the previous meeting were approved.¹

1.2 Actions

0501 1102: National Grid NTS (MH) & Eni (AS) to discuss what constitutes constraint management and provide feedback in due course.

Update: AS advised that this action would be covered within Eni 'UNC Mod 501C' presentation under item 2.2.1 below. **Closed**

0501 1103: Eni (AS) to consider the discussion points raised within the Workgroup and ensure that suitable BR's considering both the 'what if' and 'what if not' considerations (i.e. detailed provision of complete rules) are provided within an amended version of Modification 0501C.

¹ Post meeting note: a revised version (v2.0) of the 28 November 2014 meeting minutes was published on the Joint Office web site following this meeting at: <http://www.gasgovernance.co.uk/0501/281114>

Update: BF advised that a draft Modification 0501C had been published for discussion at the meeting and further details are also to be provided within the Eni 'UNC Mod 501C' presentation under item 2.2.1 below. **Closed**

2. Discussion

DM advised that the expectation is that the public consultation on the Statutory Licence Change would be published Friday 12 December 2014, with a closing date of Friday 16 January 2015.

2.1 High Level Cost Assessment in Support of Modification 0501C

MH provided an overview of Xoserve's very high-level costing analysis for 0501C explaining that there is very little detail to go with the figures as this was an indication at this stage and would require a Detailed Cost Analysis (DCA) to be raised to give more certainty on the cost. Currently the projection is for Xoserve system costs in the range of £150k – £400k, although it may be possible to narrow the range in time for consideration at the January 2015 Workgroup meeting. He was keen to stress that no National Grid IS related costs have been identified or included at this time, as Xoserve need to identify impacts first; before National Grid IS can assess if there are any resulting impacts to the National Grid systems. He also suggested that any costing information submitted to the January 2015 UNC Panel in support of the modifications would be limited in detail.

FH highlighted that National Grid NTS have asked Xoserve to provide a relatively complex solution based on the Modification 0501C as it stands and went on to suggest that Xoserve would be hard pressed to provide any more meaningful (detailed) costing analysis due to their focus on Phase 2 delivery and limited spare resource capacity.

MH advised that to develop a more detailed ROM (Rough Order of Magnitude) or more relevant, a DCA (Detailed Cost Analysis) would take a minimum 6 week lead time which is a luxury the Workgroup simply does not have. Furthermore, additional complexity is involved should the Workgroup advocate a transitional (interim) and enduring solutions approach – until a much clearer view on what could potentially be delivered is given, better design and costing information would not be forthcoming. It was suggested that if the Workgroup proposes an interim manual / systems solution workaround solution for capacity trades, rebates and overruns (which are yet to be bottomed out fully), this would potentially impact heavily on analysis requirements.

2.2 Summary Review of Modification Changes (0501, 0501A, 0501B and 0501C)

AM explained that Centrica Storage believe that their modification (0501B) is robust and suitably developed and requested that if anyone had any comments to contact him outside of this meeting to discuss. He went on to add that he believes that Denton's have sought to provide a means to alleviate the liability issues within their legal text drafting for 0501B – FH pointed out that this was the respective legal teams preference and not a National Grid NTS one.

BF indicated that he considers that both 0501 and 0501A are now at a point where they are also suitably developed.

2.2.1 Eni UNC Mod 501C presentation

Opening, AS explained that the presentation had been developed around recent discussions between Eni and National Grid NTS.

The following is intended as a summary of what turned out to be an extensive discussion around various aspects of the presentation.

Constraint Management

National Grid NTS explained that from their perspective, this process remains largely unchanged before confirming that both bundled non-residual and bundled residual need to be included within 0501C. However, they believe that the more general bundled/unbundled SMPS aspects need further consideration. Some parties

felt that this matter relates more to Shipper entitlement order, rather than a constraint order at the IPs.

LTUIOLI

In respect of the UIOLI ranking order it was noted that the proposals do not prevent Ofgem from issuing a Capacity Withdrawal Notice at which point RM suggested that they (Ofgem) could consider amending their guidance note with regards to capacity to be withdrawn. RM noted that this modification introduces new residual capacity and non-residual capacity rights which is a new concept. There is always the option to issue an instruction to National Grid NTS to remove capacity, but 501C brings in new concepts of capacity 'types'. Some parties believe that hard coding the provision within Code poses no problem, although they would request that Ofgem notes this fact.

RM explained that current regulation provisions are silent (on the matter of residual capacity) within their guidance document at this time. It was suggested by GJ that if residual capacity is not a licence issue for Ofgem, then codifying provisions should be fine from his perspective. MH suggested that whilst the current presentation proposal is fine now, once CAM comes in to effect, National Grid NTS would need to know what capacity rights are to be withdrawn under a Ofgem instruction, whether its bundled or unbundled, residual or non-residual. As far as LTUIOLI is concerned, National Grid NTS would not take back any capacity from a User unless directed to do so by Ofgem.

When asked, RM indicated that whilst he does not believe that Ofgem would have concerns relating to the proposed LTUIOLI order, he would be keen to know what the Interconnector preference / views on the bundled/unbundled, residual/non-residual matters would be, including any perceived potential impacts. DS explained the Interconnector approach to bundled/unbundled capacity withdrawals and how their regulators (CREG and Ofgem) are required to make the decisions about the quantity and duration of capacity to be removed but would not be expected to specify whether this is bundled or unbundled (not the Interconnectors/TSOs themselves).

NW suggested that at this time this is simply a hypothetical discussion especially bearing in mind that at previous Workgroup meetings it had been acknowledged that guidelines are to be developed, this in turn questions the 'value' of seeking to hard code the provisions within the UNC via 0501C, as he sees little benefit behind doing so. MH pointed out that from a National Grid NTS point of view, if Ofgem instruct them to remove capacity they will follow the instruction accordingly – in essence as long as they have a level of certainty over 'what' capacity is being removed from the Shipper, they are okay with this. MH suggested that the order in which National Grid NTS removes capacity does not need to be placed in code. Where underutilisation is identified; Ofgem would be discussing this with the shipper directly anyway to obtain justification as to why capacity is not being used. As part of that process, if capacity is to be removed, then the shipper concerned would agree with Ofgem as to which 'type' would be removed. Ofgem would then instruct National Grid NTS as to the quantity, duration and 'type' of capacity to be withdrawn. This was agreed by the workgroup as a sensible approach going forward.

MH confirmed that National Grid NTS would look to ensure that their guidance document properly aligns with any proposed Ofgem approach.

New Action 0501 1201: *In respect of LTUIOLI - Ofgem (RM) to provide confirmation of its preferred LTUIOLI order.*

New Action 0501 1202: *In respect of LTUIOLI - Ofgem (DM) to provide a view on the updated process between Ofgem and shippers as to capacity removal including the 'type' to be withdrawn.*

Capacity Transfers (interim solution)

National Grid NTS highlighted that the cost to consider any changes to the capacity product would require a DCA, as these are not expected to be simply marginal costs. NW suggested that in that case, depending on what cost figures are produced, it might be preferable to view the interim solution as more of a long term (enduring) one.

FH then moved on to explain the fixed and residual capacity rights processes before questioning how the Workgroup expects these to work in an interim solution that potentially has 'knock on' effects on the invoicing processes – in his view the business rules around this matter need further clarity before National Grid NTS can look to provide a view on whether or not the proposals can be accommodated. RM enquired when it is envisaged that the 0501C interim solution might end, to which SW suggested that this would occur when any enduring solution (including costs) was clear. RM then asked when do the Workgroup expect to make a decision on which solution (interim or enduring) to go for, and would it be before an Ofgem decision on the modification(s) or after. ~~AC indicated that whilst Eni would give this some thought, he does not expect their view to be available before January 2015~~ AC indicated that Eni would think about how an interim solution would work from an implementation perspective in the context of the compressed CAM-driven timescale.

In attempting to summarise, BF explained that one possible option would/could propose that 0501C becomes a transitional (interim) solution based modification which would then be followed up at a later date by a more enduring solution based modification.

MH asked the Workgroup what they thought Xoserve would need to deliver in terms of an interim style solution (i.e. what additional work is needed, including possible National Grid NTS – Xoserve offline processes in support of a transitional solution e.g. capacity transfer aspects). It was also noted that the issues are not just related to capacity transfers but also include areas such as rebates, overruns and capacity rights which will all need to be considered in due course. SW acknowledged that this is something that would need to be discussed and developed with Xoserve involvement.

~~AS explained that she does not think that either Modification 0501 or 0501B have the ability to preserve fungibility, or in fact provide pragmatic solutions, although 0501A at least provides a possible workable solution to allow the return of capacity. To this end, she believes that Eni's 0501C provides the best solution as it preserves fungibility whilst providing a pragmatic solution.~~

AS explained that neither Modification 0501 or 0501B have the ability to preserve fungibility or full value and although pragmatic they are wholly inadequate solutions. Modification 501A provides a simple pragmatic solution to restore value whereas Modification 501C seeks to provide a full and adequate solution whilst limiting capacity return.

GJ suggested that phasing overrun, rebate and capacity rights aspects was one possible option to which MH reminded the Workgroup that any overrun and rebate solutions would need to be in place by 1st November 2015.

AS went on to voice her concerns relating to the proposed January 2015 moratorium for capacity transfers to which FH responded explaining that the moratorium was not fixed as January but to the approval by Ofgem of the modification (0501 0501A and 0501B). FH further clarified that 0501C involves residual capacity rights aspects that the other modifications do not have. He went on to add that should the Proposer's wish to 'open up' their respective modifications along similar lines to 0501C then they have that right, but for the avoidance of any doubts, National Grid NTS would not be changing 0501 as there was very little time to meet the November 2015 implementation date.

Discussion then focused on concerns relating to why it appears to take so long for National Grid NTS and Xoserve to provide accurate cost information as this is potentially constraining delivery of a suitable solution. Responding, FH provided a brief explanation for the ROM request process and how the UNC Panel are involved in making a formal DCA request to Xoserve to provide the information. He once again pointed out the potential risk of 'stranded costs' associated with the 0501C solution, whilst MH confirmed that he had requested a ROM very early in the Workgroup's deliberations. However, he is of the opinion that should the Workgroup now wish to include capacity transfers and residual capacity aspects in a solution then a DCA would definitely be needed in due course rather than the simpler ROM.

BF advised that it is not uncommon for modifications to proceed through the process based on ROM costs and the range of these costs being narrowed as rules are defined.

NW suggested that if the Workgroup believe that the modification (0501C) cannot be successfully progressed 'as-is', then why not look to providing a (simpler) solution that is both system and workaround based. Without making any undue promises, SW indicated that Eni would consider simplifying 0501C in order to get things moving in the right direction, allowing a ROM to be defined.

2.2.2 Draft Modification 0501C consideration

AS provided an overview of the most recent amendments to the (draft) 0501C Modification, as published for this meeting, fixing attention on the Business Rules in Section 3 – Solution.

Looking at those BR's that stimulated debate, we have:

High level view of the reallocation process

Rule 3 – highlighted to relate to dates a party can instigate system capacity transfers. FH suggested that this mixes two elements and questioned whether it actually facilitates efficient implementation of 0501C;

Rule 11 – new statement relating to a Bacton User extracted from 0501A;

Rule 12 – looks to provide a default rule that also caters for residual capacity scale down or up's to 'match' remaining residual capacity;

High level view – Residual Capacity following the reallocation process

Rule 3 – extracted from the UNC;

Rule 5 – the final paragraph "Where, on a given Day, a User holds both....." becomes a default rule;

Rule 6 – detailed debate around IUK unbundled capacity processes and potential impacts was undertaken during which DS once again reiterated her capacity returns and secondary market concerns relating to shippers buying bundled capacity when unbundled was available.

National Grid NTS suggested that if 0501C was to propose that a Daily Surrender Process (DSP) is offered, the Workgroup would need to consider starting the whole process afresh. SW suggested that one option would be to allow 0501C to carry on whilst another modification is raised to address DSP concerns. MH pointed out that post 2018 where National Grid NTS has sold capacity at the new Bacton IP, IUK cannot offer the bundled quantity until the contract on the National Grid NTS side ends and therefore subject to the Bacton reallocation outcome, unbundled capacity should be available on the IUK and BBL side. NW suggested that the principle remains that parties would only buy a bundled product to flow through the IUK. RM wondered whether there was any way of a **surrender** process [whereby residual UKCS capacity holders buying a bundled product to flow across the IP \(when unbundled interconnector capacity is not available\) can notify NGG that this is to](#)

avoid buying bacton capacity twice. This would then allow NGG to be able to offer this as discretionary firm capacity as shippers having to buy capacity twice should not have the optionality of flowing across all their capacity holdings if they get a rebate ex-post (i.e. shippers holding UKCS and IP capacity (but not using it) could offer it back, to which FH suggested thought that this is once again fundamentally looking at a brand new Daily Surrender Process.

~~SW did not think that there is a real issue here because he believes that the long-term capacity only provides a (financial) return against what you originally paid anyway.~~ SW thought that long term products could be secured against this uncertainty by concerned parties. It was for each user to decide an appropriate risk reward balance. The issue highlights the complexity of the imposed change and the challenge to deliver an equitable solution. However, DS voiced her concern that as capacity is booked as bundled on the IUK side but may not be utilised (as shippers could utilise the UKCS capacity instead) then capacity could be sterilised and IUK shippers who want capacity may be restricted by users who have purchased capacity, but may not use it. FH advised that whilst National Grid NTS has the ability to offer more capacity on a discretionary basis, it rarely releases it. Furthermore, this would need a Day Ahead notification and any subsequent within Day actions undertaken by a party places a risk on National Grid NTS that may necessitate it undertaking a scale-back exercise. DS suggested that this area is not a marginal sized issue and SW acknowledged the potential 'knock on' effect, but suggested that this could be resolved by raising another modification, before stating that it is not Eni's intention to resolve it through 0501C given National Grid's scope simplification challenge. MH pointed out that in essence these are bundled capacity issues relating to CAM and the rules relating to the offer of bundled and unbundled capacity.

As the debate continued, AC advised that 0501C is looking to preserve current processes and not extend existing services, whilst maintaining a 'total value' approach that provides optionality. GJ acknowledged that Eni are trying to 'balance' initial capacity positions (zero price value) with a view to buying IUK capacity at auction in the longer term. DS suggested that whilst 0501C seeks to resolve Eni's issues, she remains concerned about the potential 'knock on' effect on the rest of the industry, and especially IUK – it was recognised that there is potentially no easy resolution of parties opposing views on this matter.

~~When asked, AC agreed that Eni would make it clear in their amended modification that they are not intending to purchase unbundled capacity, preferring the bundled product instead, even if unbundled was available.~~ When asked, AC clarified that the modification would not commercially compromise a user with long term capacity and they would be free to choose when and how to buy future capacity, both bundled and unbundled, in response to market circumstances.

Rule 7 – National Grid NTS indicated that they struggle with the current invoicing aspects as the modification is too prescriptive, to which AC responded by suggesting Eni would look to keep it at a high-level and simply reference UNC TPD Section S. FH welcomed this and could give National Grid NTS some flexibility in developing a solution.

FH asked those present to note that National Grid NTS would need sufficient time and flexibility to manage the potential volume of overruns and rebates be issued on an 'as soon as practicably possible' basis. The Capacity Invoice created relating to the Bacton ASEP will also include weighted average capacity charge aspects.

As far as neutrality charges are concerned, FH suggested that further consideration of what and how items are handled through the neutrality route is needed.

When asked, MH indicated that National Grid NTS would need to think about how the Short Haul Tariff (commodity invoice) process would work in practice, as this is an entry/exit arrangement issue, for which CAM provisions are silent. GD confirmed

that there cannot be more than one Entry Point to the Exit Point. MH suggested that one possible solution involves a re-declaration process for when Bacton splits – in essence a contractual, rather than modification related issue. MH agreed to provide a view on the revised process.

During a brief discussion around unutilised capacity, AC agreed to reconsider the new definition contained in Item 1, rule 17.

New Action 0501 1203: National Grid NTS (MH/FH) to provide a view on whether or not a re-declaration process if needed once Bacton is split.

Timeline for Bacton Reallocation process

Opening, MH agreed to provide a copy of National Grid NTS's original diagram to enable Eni to tweak to satisfy 0501C requirements.

Rule 5(e) – aligned business days with 0501 provisions;

Rule 5(h) – new statement aligns with 0501A provisions;

Rule 6 – in essence, becomes the default rule;

Rule 13 - in essence, becomes the default rule;

Rule 16(d) – new statement aligns with 0501A provisions;

Implications of running the Bacton Capacity Reallocation process

Rule 2 – new statement (bullet) allowing transfer capacity to have residual rights;

Rule 7 – National Grid NTS suggest that care may be needed to avoid double counting where a party has residual capacity at UKCS IP and Bacton IP ASEP. SW suggested that this is not really an issue, as he believes parties would look at one ASEP before the other (i.e. the capacity would be utilised at the point where it is first held, then would only be available to utilise at the other ASEP if not fully utilised at the first one) – FH to consider and provide a view in due course.

Rule 13 – questions raised around User flexibility to utilise bundled/unbundled capacity at the IP. Suppression of full or partial overruns (i.e. overrun triggered, but not invoiced under certain circumstances) needs due consideration as it relates to reconciling overrun charges to 'match' a Users residual capacity.

When asked, Eni confirmed that they would be looking for provision of an invoice that comes already corrected from National Grid NTS.

At this time National Grid NTS are not in a position to commit their Market Operations personnel to look into the matter.

Rules 15, 16 & 17 - When MH pointed out that he believes that any ROM would not necessarily provide sufficient cost information and that there is no longer time to complete a detailed DCA, SW agreed in principle to the remove the bulk of the residual capacity with associated transfer rights aspects from within 0501C.

GJ highlighted a potential concern that based on M+2 overrun charges, it might be possible to end up with high value (accruing) invoices – MH agreed that how these would be managed in an interim solution would need to be considered, especially as National Grid NTS does not have the spare resource capacity to monitor individual Shipper overrun positions on a daily basis. Some parties queried this statement on the grounds that the information is already available to National Grid NTS. FH pointed out that there could be a significant resource implications involved; hence the previous suppressed overrun suggestion.

User Pays Table

Following discussion with Ofgem, Eni have added some additional wording whilst remaining committed to their original intent that the proposed changes are in response to a CAM and EU directive and therefore it is unreasonable to charge it

through the User Pays mechanisms as they wish to maintain existing flexibility in the products they purchased and not extend or enhance the service. It is simply maintaining an existing service. It was also suggested that no EU related modification should incur User Pays charges – this was not necessarily a universally supported view throughout the Workgroup. MH stated that the change was a GB proposal and both offline workarounds and changes to Xoserve systems were needed, both incurring costs. MH also suggested that any User Pays modification should identify the beneficiaries of the change and targeted appropriately, as this would assist parties responding to the consultation. MH suggested that a non Bacton user would not necessarily be expecting to be impacted and as such any proposer should make this clear as to who pays. Eni maintained their view regarding User Pays. MH stated that National Grid NTS along with other parties would comment on the User Pays aspect during the consultation process.

BF pointed out that the Workgroup Report would need to capture the various views in an impartial way in order to enable Panel and Ofgem to make informed decisions in due course. He noted that ultimately, it may well boil down to whether or not Ofgem would approve the modification(s) without an accompanying Agency Charging Statement (ACS).

The Proposers of each modification can define the split of costs.

Ofgem were asked to provide a simple (yes or no) high-level view on whether modifications should qualify for User Pays status as this could potentially avoid unnecessary and protracted discussions on the matter. DM asked the various proposers to provide supporting statements for their respective positions on User Pays as it would aid Ofgem in providing their high-level view.

When asked if User Pays status was advocated, whether or not a detailed costing split would be made available prior to consultation, BF suggested that this would need to be discussed amongst the Transporters as DNs are not impacted by this change.

Relevant Objectives Table

BF advised that for the Workgroup Report purposes, each modifications respective relevant objective would be recorded and considered. He requested that each Proposer consider how their respective modification would further the relevant objectives.

BF indicated that he would look to develop a tabulated representation for recording relevant objectives within the Workgroup Report and would also consider presenting respective business rules within various appendices.

New Action 0501 1204: National Grid NTS (FH) to provide a view on potential for double counting where a party has residual capacity at UKCS IP and Bacton IP ASEP (i.e. the capacity would be utilised at the point where it is first held, then would only be available to utilise at the other ASEP if not fully utilised at the first one).

New Action 0501 1205: *Suppression of overruns* - National Grid NTS (FH) to consider whether or not they might be able to provide an invoice that comes already corrected from National Grid NTS.

New Action 0501 1206: Eni (AS/SW/AC) & National Grid NTS (MH/FH) to consider the discussion points raised within the Workgroup and continue to work together with a view to developing a suitably amended version of Modification 0501C.

New Action 0501 1207: Ofgem (RM) to provide a simple (yes or no) high-level view on whether this modification should qualify for User Pays status.

New Action 0501 1208: All Proposers (0501, 0501A, 0501B and 0501C) to consider how their respective modifications would further the relevant objectives and be ready to provide their views for inclusion within the Workgroup Report at the 07 January 2015 meeting.

2.3 Consideration of Legal Text (0501, 0501A, 0501B and 0501C)

MH reminded those present that Denton's are looking to ensure that the legal text is aligned across all modifications whilst remaining 'fit for purpose'.

When asked, MH indicated that he believes that once an amended 0501C modification had been provided, suitable legal text could be developed.

2.4 Development of Workgroup Report

In recognising that it is highly likely that 0501C would be amended in response to the Workgroup discussions, further consideration was deferred.

3. Next Steps

When asked how the Workgroup Report would be developed, BF confirmed that the report would seek to provide a view from all of the Workgroup participants. Additionally, if Ofgem have any items they would like including within the report to please let him know in advance of the January 2015 meeting. BF also reminded those present that the Workgroup could ask Panel to consider asking specific questions as part of the formal consultation process. He also pointed out that should the majority of respondents believe that the modifications should be User Pays, it is highly likely that the Panel would direct the Workgroup reconsider the matter.

Concluding discussions, MH explained that for the avoidance of any doubt he would not be instigating preparation of a Details Cost Analysis (DCA) for 0501C at this time, but will continue to provide costs and impacts via the ROM process.

4. Any Other Business

None.

5. Diary Planning

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

Workgroup meetings will take place as follows:

Time/Date	Venue	Workgroup Programme
10:00 Wednesday 07 January 2015	Energy Networks Association, 6 th Floor Dean Bradley House, 52 Horseferry Road, London SW1P 2 AF	Completion of Workgroup Report

Action Table

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0501 1102	28/11/14	2.1	To discuss what constitutes constraint management and provide feedback in due course.	National Grid NTS (MH) & Eni (AS)	Update provided. Closed
0501 1103	28/11/14	3.3	To consider the discussion points raised within the Workgroup and ensure that suitable BR's considering both the 'what if' and 'what if not' considerations (i.e. detailed provision of complete rules) are provided within an amended version of Modification 0501C.	Eni (AS)	Update provided. Closed
0501 1201	11/12/14	2.2.1	<i>In respect of LTUIOLI</i> - to provide confirmation of its preferred LTUIOLI order.	Ofgem (RM)	Update to be provided.
0501 1202	11/12/14	2.2.1	<i>In respect of LTUIOLI</i> - to provide a view on an updated process relating to removal of capacity 'types'.	Ofgem (DM)	Update to be provided.
0501 1203	11/12/14	2.2.2	To provide a view on whether or not a re-declaration process for Short Haul is needed once Bacton is split.	National Grid NTS (MH/FH)	Update to be provided.
0501 1204	11/12/14	2.2.2	To provide a view on potential for double counting where a party has residual capacity at UKCS and Bacton IP ASEP (i.e. the capacity would be utilised at the point where it is first held, then would only be available to utilise at other ASEP if not fully utilised at the first one).	National Grid NTS (FH)	Update to be provided.
0501 1205	11/12/14	2.2.2	<i>Suppression of overruns</i> - to consider whether or not they might be able to provide an invoice that comes already corrected from National Grid	National Grid NTS (FH)	Update to be provided.

Action Table

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
			NTS.		
0501 1206	11/12/14	2.2.2	To consider the discussion points raised within the Workgroup and continue to work together with a view to developing a suitably amended version of Modification 0501C.	Eni (AS/AC/SW) & National Grid NTS (MH/FH)	Update to be provided.
0501 1207	11/12/14	2.2.2	To provide a simple (yes or no) high-level view on whether the modification should qualify for User Pays status.	Ofgem (RM)	Update to be provided.
0501 1208	11/12/14	2.2.2	To consider how their respective modifications would further the relevant objectives and be ready to provide their views for inclusion within the Workgroup Report at the 07 January 2015 meeting.	All Proposers	Update to be provided.