

Stage 01: Modification

0443:

Arranging Flow Swaps between NTS/LDZ Offtakes with increased lead times or for prolonged periods

At what stage is this document in the process?

- 01 Modification
- 02 Workgroup Report
- 03 Draft Modification Report
- 04 Final Modification Report

The current rules as set out in OAD do not allow for flow swaps between LDZ/NTS offtakes to be notified in advance or to run for prolonged periods. Introducing additional provisions will allow Transporters increased certainty when arranging maintenance timetables at sites.



The Proposer recommends that this modification should be:

- subject to self-governance
- assessed by a workgroup



High Impact:



Medium Impact:
DNOs and National Grid Transmission



Low Impact:

0443

Modification

~~04 January~~ 18 April 2013

Version ~~1~~2.0

Page 1 of 10

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Contents

1	Summary	3
2	Why Change?	4
3	Solution	5
4	Relevant Objectives	7
5	Implementation	8
6	Legal Text	9
7	Recommendation	10

About this document:

This modification will be presented by the proposer to the panel on 17 January 2013.

The panel will consider the proposer’s recommendation, and agree whether this modification should be subject to self-governance; and whether it should be issued for consultation or be referred to a workgroup for assessment.

[This modification is submitted in the full knowledge and support of all DNOs and National Grid NTS.](#)


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1 Summary

Is this a Self-Governance Modification?

It is proposed that this modification is subject to self governance as there is limited impact on customers or competition. This modification will only amend the arrangements between DNOs and National Grid Transmission.

Why Change?

The current provisions as set out in OAD I 2.4 and 2.5 only allow flow swaps between LDZ/NTS offtakes on Day One (D) of any planned or urgent maintenance and also does not enable either party to request a flow swap ahead of time i.e. before D-1. This places risk on NGT and DNOs when flows need to be amended between offtakes. This modification proposes an enhancement to [facilitate](#) this process.

Solution

It is proposed to ~~amend~~ [add](#) to the current provisions as set out in OAD I 2.4 and 2.5 to establish a ~~process of flow swap notifications between DNOs and NGT. The notice can be sent as early as [D-30] and will notify of a flow swap period and indicative volumes~~ [Long Term Flow Swap Agreement \(LTFSA\) that can be signed between DNOs and National Grid NTS. The agreement can be entered into at any time prior to the flow swap and may give confirmation of a flow swap period and applicable volumes. It is anticipated that for flow swaps resulting from emergency maintenance that the current process as set out in OAD I 2.4 and 2.5 will be utilised for Day 1 after which time a LTFSA can be signed between DNOs and National Grid NTS for any period of time required to complete the works.](#)

Relevant Objectives

~~Being able to get prior notice of any maintenance and the associated flow rates is beneficial to both parties for planning purposes thereby ensuring efficient operation of the combined networks. This will benefit relevant objectives a) and b) by offering benefits to both the transmission and distribution networks.~~

[Being able to agree a long term flow swap is beneficial to both parties for planning purposes thereby ensuring efficient operation of the combined networks. This will benefit relevant objectives a\) and b\) by offering benefits to both the transmission and distribution networks.](#)

As DNOs, under the proposed arrangements, will be able to flow swap whilst undergoing urgent or planned maintenance past Day One this will ensure that the 1 in 20 Licence Condition can be met by DNOs hence further facilitating relevant objective c).

As the modification is ~~amending the~~ [adding additional](#) rules ~~which currently do not function as intended due to not being able to flow swap past D this mod can be~~ [to those currently in place](#) under OAD I 2.4 and 2.5 [to enable flows to be swapped beyond D, this may be](#) seen to further facilitate the implementation of the code and so relevant objective f).

~~Any potential implementation costs will be confirmed following development and ROM.~~

Implementation

No implementation timescales are suggested.

0443

Modification

~~04 January~~ [18 April](#) 2013

Version ~~1~~2.0

Page 3 of 10

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2 Why Change?

Currently the Maintenance programme governing NTS/LDZ offtakes is governed by:

- Section G of the Offtake Arrangements Document (OAD)
- Safe Control and Operations Interface procedures
- Safe Control of operations processes

These processes can result in DNOs or National Grid NTS requiring flows to be swapped between LDZ/NTS offtakes for an amount of time. However, these potential resulting flow swaps between two or more offtakes can only be confirmed under Section I 2.4 and 2.5 of the OAD through a revised Offtake Profile Notice (OPN) at D-1 or D after the initial OPN has been provided. This means that for any planned or urgent maintenance, either requested by DNO or [NGT National Grid NTS](#), the flow swap can only be carried out on the first day as after this time one of the offtakes may not be flowing and so 2 or more OPNs cannot be amended as per the current UNC arrangements. There is currently no way around this within the existing UNC rules. It is also not currently possible for DNOs to notify [NGT National Grid NTS](#) or for [NGT National Grid NTS](#) to request a flow swap with earlier timescales providing the other party with increased notice. The ability to do this would ease planning for DNOs and [NGT National Grid NTS](#).

0443

Modification

~~04 January~~ 18 April 2013

Version ~~1~~ 2.0

Page 4 of 10

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3 Solution

It is proposed that a new process facility is created to enable flow swaps between LDZ/NTS Offtakes to be notified agreed as early as [D-30], to notify either DNOs or National Grid NTS of a longer running flow swap.

~~A new Flow Swap Notice (FSN) will be created. This will be sent by fax between DNOs and National Grid NTS and either party can request the flow swap. The FSN can be sent up to [30 days] prior to any planned flow swap required ([D-30]). The FSN can also be sent on the first day of any urgent flow swap to notify of the requirement for an ongoing flow swap period. The FSN will contain a start and end date of the flow swap period.~~

~~Once received, the FSN receiving party shall reply back to the FSN requesting party either accepting or rejecting the flow swap. If the flow swap is rejected reasons must be provided as to why this is being rejected. It is not proposed to amend the current NGT rejection rights as set out in OAD I 2.5.5 or the DNO rejection rights as set out in OAD I 2.4.5~~

~~Once approved by both parties the FSN shall be affective from the flow swap start date until the end date as set out on the FSN. During the flow swap period OPNs will then be sent with the flow swap values as agreed within the FSN without incurring overrun charges as per TPD Section B 3.13.10. For clarity, if an OPN has already been sent for a day included in the flow swap period i.e. on D, then a revised OPN will be sent reflecting the agreed values.~~

~~Once the FSN has been approved, either before the flow swap period commences or during the period (prior to the end date), the requesting party will be able to terminate the arrangements with agreement from the receiving party. Amendments to the accepted FSN can also be requested by either party and if agreed the requesting party will send an update FSN reflecting the agreed amendments. This FSN will then supersede the previous one once approved by the receiving party.~~

~~It is suggested that OAD I 2.4 and 2.5 be amended to accommodate this change.~~

~~It is not proposed to amend or affect any of the current maintenance notice arrangements as set out in OAD G.~~

A new Long Term Flow Swap Agreement (LTFSA) will be created. This will be agreed between DNOs and National Grid NTS, with either party able to request the flow swap. The LTFSA can be signed at any point prior to any planned flow swap required or on Day 1 of any flow swap resulting from emergency or urgent maintenance..

Where in the opinion of a DNO that it is necessary to further the safe and efficient operation of the LDZ, or National Grid NTS that it is necessary to further the safe and efficient operation of the NTS, the DNO or National Grid NTS may request to enter into a Long Term Flow Swap Agreement (LTFSA).

Either the DNO or National Grid NTS will comply with the request to enter into a LTFSA unless in their reasonable opinion entering into the LTFSA itself would materially prejudice the safe and efficient operation of the LDZ/NTS.

0443
Modification
04 January18 April 2013

Version 12.0

Page 5 of 10

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The calculation of the NTS Exit Overrun would take into account any additional quantity of gas offtaken at an LDZ/NTS Offtake for the Day at the LDZ/NTS Offtake following the application of the LTFSFA.

Either party would be able to request that the LTFSFA be amended or terminated.

A LTFSFA can be put in place for either single or multiple instances of flow swaps. Any flow swap will have clearly defined start and end date agreed between the DNO and National Grid NTS.

It is not proposed to amend the current provisions as set out in OAD I 2.4 and I 2.5.

It is not proposed to amend or affect any of the current maintenance notice arrangements as set out in OAD G.

User Pays
Classification of the modification as User Pays, or not, and the justification for such classification.
Not currently User Pays but await ROM <u>Not User Pays</u>
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.
Proposed charge(s) for application of User Pays charges to Shippers.
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.

4 Relevant Objectives

Impact of the modification on the Relevant Objectives:

Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	Positive
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.	Positive
c) Efficient discharge of the licensee's obligations.	Positive
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.	None
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.	None
f) Promotion of efficiency in the implementation and administration of the Code.	Positive
g) 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.	None

~~Being able to get prior notice of any maintenance and the associated flow rates is beneficial to both parties for planning purposes thereby ensuring efficient operation of the combined networks. This will benefit relevant objectives a) and b) by offering benefits to both the transmission and distribution networks.~~

Being able to agree a long term flow swap is beneficial to DNOs and National Grid NTS for planning purposes thereby ensuring efficient operation of the combined networks. This will benefit relevant objectives a) and b) by offering benefits to both the transmission and distribution networks.

As DNOs, under the proposed arrangements, will be able to flow swap whilst undergoing urgent or planned maintenance past Day One this will ensure that the 1 in 20 Licence Condition can be met by DNOs hence further facilitating relevant objective c).

As the modification is ~~amending the~~ adding additional rules ~~which currently do not function as intended due to not being able to flow swap past D this mod can~~ to those currently in place under OAD I 2.4 and I 2.5 to enable flows to be swapped beyond D, this may be seen to further facilitate the implementation of the code and so relevant objective f).

0443

Modification

~~04 January~~ 18 April 2013

Version ~~1~~ 2.0

Page 7 of 10

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5 Implementation

No implementation timescales are suggested as this is dependant on implementation requirements

0443

Modification

~~04 January~~ 18 April 2013

Version ~~1~~2.0

Page 8 of 10

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6 Legal Text

~~Legal text to be provided separately~~

OAD Section I

Add new paragraph 6.5 to read as follows:

6.5 Long Term Flow Swap Agreements

- 6.5.1 For the purposes of this Section I, a Long Term Flow Swap Agreement means an agreement which a DNO and National Grid NTS enter into to facilitate the safe and efficient operation of the network in instances where it would otherwise be prejudiced without the movement of gas flows between Offtakes.
- 6.5.2 National Grid NTS and a DNO may enter into a Long Term Flow Swap Agreement at any time prior to the first date a flow swap is required under such an agreement.
- 6.5.3 National Grid NTS may request that a DNO enter into a Long Term Flow Swap Agreement for one or more Offtakes in an LDZ.
- 6.5.4 The DNO shall comply with National Grid NTS' request unless in the DNO's reasonable opinion the safe and efficient operation of the LDZ (consistent with the DNO's obligations to Users under the Transportation Principal Document) would be materially prejudiced by the flow of gas at the relevant Offtakes, in which case the DNO shall:
- (a) inform National Grid NTS of the position as soon as possible following receipt of National Grid NTS' request; and
 - (b) cooperate with National Grid NTS and use all reasonable endeavours to agree an alternative
- 6.5.5 A DNO may request that National Grid NTS enter into a Long Term Flow Swap Agreement for one or more Offtakes in an LDZ.
- 6.5.6 National Grid NTS shall comply with the DNO's request unless in National Grid NTS' reasonable opinion the safe and efficient operation of the NTS (consistent with National Grid NTS' obligations to User's under the Transportation Principal Document) would be materially prejudiced by the flow of gas at the relevant Offtakes, in which case National Grid NTS shall:
- (a) inform the DNO of the position as soon as possible following receipt of the DNO's request; and
 - (b) cooperate with the DNO and use all reasonable endeavours to agree an alternative.
- 6.5.7 A Long Term Flow Swap Agreement can be terminated in accordance with its terms.

Amendment Required to UNC – TPD Section B

- 3.13.10 For the purposes of this paragraph 3.13, the calculation of a Chargeable NTS Exit (Flat) Overrun shall take into account any additional quantity of gas offtaken at an NTS/LDZ Offtake consistent with a revision to the rate of offtake of gas for the Day at the NTS/LDZ Offtake following the application of OAD Sections 12.4 and 2.5 and 6.5.

0443

Modification

~~04 January~~ 18 April 2013

Version 12.0

Page 9 of 10

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7 Recommendation

The Proposer invites the Panel to:

- Determine that this modification should be subject to self-governance and;
- Determine that this modification should progress to [the Offtake Arrangement](#) Workgroup for assessment.

0443

Modification

~~04 January~~ 18 April 2013

Version ~~1~~2.0

Page 10 of 10

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