

firm capacity*, referred to as the ‘use it or lose it’ (UIOLI) quantity, plus a discretionary amount of NTS Entry Capacity which National Grid NTS determines and is currently released at zero price. National Grid NTS is concerned that this interruptible capacity can be released while firm capacity remains unsold, potentially making the interruptible capacity firm (if the unsold firm capacity is not procured) due to the low likelihood of curtailment.

Industry concern about the increased TO Entry Commodity Charges led to National Grid NTS launching a fundamental review of the entry charging principles through the formation of the industry entry charging review group (ECRG).

A major priority identified by the review group was to reduce the significant quantities of NTS Entry Capacity which are auctioned at zero reserve price. This could be achieved by the removal of the firm NTS Entry Capacity discounts, and by amending the circumstances under which Daily Interruptible NTS Entry Capacity is released, hence reducing the circumstances under which Interruptible NTS Entry capacity is made available.

Amending the circumstances under which Daily Interruptible NTS Entry Capacity is released will be covered by a further UNC Modification Proposal.

Summary of this proposal

National Grid NTS proposes that the zero auction reserve price for Within-day Daily NTS Entry Capacity be removed from the UNC and that the reserve price be set out in the NTS Transportation Statement and calculated in accordance with the NTS Charging Methodology Statement.

For the avoidance of doubt, the zero reserve price for Daily Interruptible NTS Entry Capacity would still apply.

b) Justification for Urgency and recommendation on the procedure and timetable to be followed (if applicable)

Urgent Procedures are not requested

c) Recommendation on whether this Proposal should proceed to the review procedures, the Development Phase, the Consultation Phase or be referred to a Workstream for discussion.

National Grid NTS will discuss this issue at the February and March Transmission Work streams and subsequently submit this Modification Proposal to Panel. The proposal can then proceed to consultation with a view to submit the Final Modification Report in May.

2 User Pays

a) Classification of the Proposal as User Pays or not and justification for classification

No changes to Xoserve systems or processes have been identified

b) Identification of Users, proposed split of the recovery between Gas Transporters and Users for User Pays costs and justification

N/A

c) Proposed charge(s) for application of Users Pays charges to Shippers

N/A

d) Proposed charge for inclusion in ACS – to be completed upon receipt of cost estimate from xoserve

N/A

3 Extent to which implementation of this Modification Proposal would better facilitate the achievement (for the purposes of each Transporter's Licence) of the Relevant Objectives

- National Grid NTS believes that in respect of Standard Special Condition A11 (a), the efficient and economic operation of the pipeline system, this proposal would encourage longer term bookings of entry capacity and therefore be consistent with the economic and efficient development of the system.
- National Grid NTS believes that in respect of Standard Special Condition A11 (d) so far is consistent with sub-paragraphs (a) to (c) the securing of effective competition (i) between relevant shippers, this proposal would reduce the large quantities of zero priced NTS Entry Capacity being released, therefore possibly encouraging Shippers to purchase longer term capacity and utilize the secondary market. This proposal is part of a suite of proposals that are seeking to reduce the level of the TO Entry Commodity charge and hence seeking to avoid potential cross subsidies which may arise when this commodity charge represents a significant proportion of TO entry revenue. National Grid believes that removing potential cross subsidies is consistent with promoting competition.
- National Grid NTS believes that in respect of Standard Special Condition A11 (c) so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence, this proposal would better facilitate the charging methodology objectives as set out in Standard Special Condition A5 5 including cost reflectivity, promoting efficiency and avoiding undue preference.

4 The implications of implementing this Modification Proposal on security of supply, operation of the Total System and industry fragmentation

National Grid NTS believes this proposal would benefit operation of the Total System* with the UK as an attractive destination for gas through increased regulatory and charging certainty

5 The implications for Transporters and each Transporter of implementing this Modification Proposal, including:

a) The implications for operation of the System:

National Grid NTS believes that the operation of the system* would not be adversely affected, this Proposal could prove beneficial to the operation of the system as more capacity could be booked long term.

b) The development and capital cost and operating cost implications:

No cost implications have been identified

c) Whether it is appropriate to recover all or any of the costs and, if so, a proposal for the most appropriate way for these costs to be recovered:

N/A.

d) The consequence (if any) on the level of contractual risk of each Transporter under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal

No such consequences have been identified.

6 The extent to which the implementation is required to enable each Transporter to facilitate compliance with a safety notice from the Health and Safety Executive pursuant to Standard Condition A11 (14) (Transporters Only)

Not applicable

7 The development implications and other implications for the UK Link System of the Transporter, related computer systems of each Transporter and related computer systems of Users

No changes to UK Link, NTS systems or User systems have been identified

8 The implications for Users of implementing the Modification Proposal, including:

a) The administrative and operational implications (including impact upon manual processes and procedures)

National Grid NTS believes there are minor administrative or operational implications

b) The development and capital cost and operating cost implications

National Grid NTS believes there are no development, capital or operating cost implications.

c) The consequence (if any) on the level of contractual risk of Users under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal

No consequences on the level of contractual risk have been identified.

9 The implications of the implementation for other relevant persons (including, but without limitation, Users, Connected System Operators, Consumers, Terminal Operators, Storage Operators, Suppliers and producers and, to the extent not so otherwise addressed, any Non-Code Party)

No consequences on the implementation for other relevant persons have been identified.

10 Consequences on the legislative and regulatory obligations and contractual relationships of the Transporters

National Grid NTS has not identified any such consequences.

11 Analysis of any advantages or disadvantages of implementation of the Modification Proposal not otherwise identified in paragraphs 2 to 10 above

Advantages

National Grid NTS believes that the benefits of this proposal are that the Proposal:

- Should increase the proportion of NTS TO target entry revenue recovered through entry capacity charges. The forward looking analysis suggests that, with the proposed reduction of quantities of Daily NTS Interruptible Capacity made available combined with the removal of firm Daily NTS Entry Capacity reserve price discounts, entry capacity revenue will increase as more firm capacity is procured other than at a zero price. This is a necessary first step en route to achieving the maximum proportion of NTS TO target entry revenue which can be recovered through entry capacity charges.
- Provides a more apt redistribution of charges. The TO Entry Commodity Charge was designed as a correction mechanism for under recovery of allowed revenue from auctions. Using this charge to collect a large amount of under-recovered income from entry capacity auctions may currently result in a redistribution of charges from Users, acquiring Entry Capacity at a discounted rate, to those Users that have previously paid a “full” rate for capacity.
- Promotes secondary trading. The availability of capacity with zero reserve prices may be a factor that inhibits entry capacity trading at ASEPs when there is unsold Obligated NTS Entry capacity. Some Users may have

surplus capacity holdings and others are seeking short term rights but the value of sold capacity is minimised by the existence of zero priced capacity. Removal of discounts should promote the secondary market in entry capacity.

- Could prevent cross subsidies between Shippers who buy NTS Entry Capacity (short term) rather than firm (long term). Shippers have an incentive to purchase Daily NTS Entry Capacity rather than QSEC or AMSEC. This could mean that short term capacity buyers are having their costs paid by Shippers who have previously paid the longer term rate for capacity creating cross subsidies between Shippers who buy firm rather than interruptible.
- Should increase the proportion of revenue recovered through capacity, as opposed to commodity, charges through increasing the incentive to make longer-term bookings (e.g. QSEC) which might improve price certainty.
- When capacity becomes constrained at an entry point, where previously there was a perception of surplus capacity, and where long-term signals for incremental capacity investment have not been received from QSEC auctions, high and volatile prices and more frequent scale back of Interruptible NTS Entry Capacity may be observed until Incremental NTS Entry Capacity is signalled and provided.

Disadvantages

- Users would see a decrease in the quantities available at zero reserve price and this may be viewed as limiting their ability to access entry capacity; however, the UIOLI interruptible quantities would continue to be released at zero price when firm capacity was close to selling out.
- Removal of discounts will not necessarily remove the shortfall between TO target entry revenue and TO entry capacity revenue (depending on shipper booking behaviour); however, it is a necessary step prior to further options being developed, as required, including price multipliers and/or further changes to products.

12 Summary of representations received as a result of consultation by the Proposer (to the extent that the import of those representations are not reflected elsewhere in this Proposal)

Not applicable.

13 Detail of all other representations received and considered by the Proposer

Not applicable.

14 Any other matter the Proposer considers needs to be addressed

Not applicable.

15 Recommendations on the time scale for the implementation of the whole or any part of this Modification Proposal

Draft Proposal discussed at Transmission Work stream 04 Feb 2010

Draft Proposal raised at Mod Panel 18 Feb 2010

Proposal developed at Transmission Work stream 04 Mar 2010

Proposal submitted to Mod Panel 18 March 2010

Closeout for representations 08 Apr 2010

Modification Panel decide upon recommendation 15 Apr 2010

FMR submitted to Ofgem May 2010

Proposed implementation date 01 Oct 2010

16 Comments on Suggested Text

To be advised

17 Suggested Text

To be advised

Code Concerned, sections and paragraphs

Uniform Network Code

Transportation Principal Document

Section(s) B – System Use and Capacity 2.4.13 f

Proposer's Representative

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Proposer

National Grid NTS