## Transmission Workgroup Minutes Thursday 02 June 2016 Elexon, 350 Euston Road, London NW1 3AW

#### Attendees

Copies of papers are available at: www.gasgovernance.co.uk/tx/020616

#### 1. Introduction and Status Review

LJ welcomed all to the meeting.

#### 1.1 Approval of Minutes from the previous meeting (05 May 2016)

The minutes of the previous meeting were approved.

#### 1.2 Ofgem Update

DR drew attention to Ofgem's decision letter (rejection) in respect of *Uniform Network Code (UNC) UNC541 Removal of uncontrollable UNC charges at ASEPs which include sub- terminals operating on a 06:00 to 06:00 Gas Day*, published at: https://www.ofgem.gov.uk/publications-and- updates/uniform-network-code-unc-unc541removal-uncontrollable-unc-charges-aseps- which-include-sub-terminals-operating-0600- 0600-gas-day.

#### **1.3 Pre Modification Discussions**

Two topics were presented for discussion.

#### 1.3.1 Demand Side Response (DSR) - Removal of 7 Days Rolling Profile

GD outlined the background and progress to date. DSR reduces the likelihood of escalation to an emergency position.

The implementation of gas DSR (UNC Modification 0504) is enabled by changes to the OCM Locational Market. National Grid NTS has been working with ICE Endex (the OCM Market Operator) to implement gas DSR by 01 October 2016. During the detailed design phase ICE Endex identified barriers (financial and regulatory) in implementing the ability to place 7 day rolling offers on the OCM. Having informally canvassed views and in light of these barriers National Grid NTS believes it is right to remove this functionality and has launched a gas DSR methodology consultation to formally seek industry views (deadline for responses is 14 June 2016). A report will then be submitted to Ofgem for an anticipated decision by 19 July 2016. Subject to the findings and subsequent Ofgem decision, changes maybe required to the UNC and these will need to be in place by 01 October 2016. Currently a change to the legal text introduced by UNC Modification 0504, i.e. the part removal of TPD Section D5.1.2(b), was envisaged.

GD explained National Grid NTS' expectation that any subsequent modification will be subject to self-governance (and potentially fast track, because it would be enacting on direction from Ofgem). RF expressed disappointment that it had reached this point without previously identifying the problems described; this will increase Shippers' workloads and may impact their willingness to participate in DSR. GD acknowledged the sentiments, but was now seeking views on the most transparent and efficient way to implement the modification by 01 October 2016. There were three options:

- Option 1 Submit to June panel, seeking a Workgroup discussion before going to consultation;
- Option 2 Submit to July panel, proposing issue straight to consultation (subject to methodology change and Ofgem decision); or
- Option 3 Raise as an Urgent modification.

Timelines were illustrated to clarify the constraints in the process. An Appendix containing additional information had been provided with the presentation. There was a short discussion. NR asked if there were other options relating to ICE. GD indicated there would be two webinars in the next week to discuss the position in more detail, and gave a brief description of the ICE bid process.

The discussions favoured letting the methodology consultation taking its course and reach a conclusion. Fast track discussions could then be arranged to assess impacts and look to raise a modification at the July Panel if necessary.

#### 1.3.2 Seasonal Energy Balancing Credit Cover

PHa advised that Opus Energy was intending to raise a modification proposing to amend the Energy Balancing Credit Rules so that a User's credit cover is limited to months in the same season as the current one, instead of covering the maximum requirement in the last 12 months as at present.

Outlining the issue, PHa explained that Shippers are currently obliged to lodge credit cover in relation to their peak indebtedness for the preceding 12 months. The gas system, and most users of it, has significantly higher volumes, and therefore potential imbalance bills, in the winter months. This means the collateral lodged by most

Shippers outside of winter months is vastly in excess of what is needed to cover credit risk exposures during this period.

A graph demonstrating current credit cover requirements over a 12 month period was displayed; Users' balancing bills are a couple of months behind.

PHa had had discussions with the Energy Balancing Committee (EBCC) regarding practicalities. Two potential solutions had been identified and the Workgroup's view was being sought on the most appropriate. PHa observed that, in both solutions, the existing restrictions which prevent a User from withdrawing collateral to below tolerances based on their current indebtedness and cash call limit would remain, thereby providing sufficient protection against under-collateralisation.

Solution 1 - Adjust the Energy Balancing Credit Rules so that they look back over the previous 12 months within the same season (summer and winter) when calculating the current credit requirement. This would create a separate profile for exposure during the winter and summer period in order to align credit cover more appropriately to actual credit exposure. A graph demonstrating the effects of this solution (seasonal credit cover) was displayed.

Solution 2 - Create a set of quarterly load factors by Shipper, which allocate a ratio of maximum indebtedness to each quarter. These would be calculated by Xoserve and be bespoke to each Shipper. The minimum cover would then be the maximum requirement in the last year, calculated using the current method, multiplied by the quarterly ratio for that quarter. A graph demonstrating the effects of this solution (quarterly credit cover) was displayed.

The options were discussed. NW asked if it would increase the frequency of cash calls against User's portfolios. PHa explained that Opus had tested against its own portfolio and did not believe it to have an impact. LJ pointed out that Xoserve would provide some aggregated data/analysis in respect of the proposal later in the process.

Concerns were expressed regarding sudden adverse weather conditions and sudden portfolio growth, and how these occurrences might be managed. RF explained that the EBCC monitors and reviews these positions; it was possible for a User to receive cash calls quite quickly/every day. The potential impacts of portfolio growth and scenarios where sufficient cover might not readily be in place were discussed; it was noted it was a Shipper's responsibility to monitor and maintain an adequate level of cover to accommodate seasonal change. The ability and timeframe in which to lodge credit cover were discussed. PHa explained about Letters of Credit (LoC) and how Shippers used these.

NR asked if there was a choice NOT to use either Solution and for a Shipper maintain a different level of (adequate) credit throughout if it chose to do so; PHa indicated that this right would remain.

#### Summary

Concluding, LJ summarised that, from these discussions, there appeared to be no preferred solution. Noting this, PHa affirmed that his preference was for Solution 1 because of its simplicity, and that the modification will be progressed accordingly.

#### 2. European Codes

#### 2.1 EU Codes Update

CH gave a brief overview of the current position of the EU Codes, including timelines and implementation dates.

#### 2.1.1 EU Tariffs Code Update

CH gave an update on the current position.

A number of topics were of wider concern to Member States, including ACER's review of charging methodology (most discussed topic); ACER guidance on regulatory accounting principles; Asset cost split; Storage discounts; pricing of backhaul; secondary adjustments, language of periodic consultation, existing contracts, implementation, article for interconnectors, and entry into force.

The revised text of TAR NC will be provided prior to the Comitology meeting at the end of June; the Impact Assessment will be provided for the June meeting. CH drew attention to the Comitology link in the March slides, advising that the text will be published there on 09 June 2016. It will also be made available for publication on the Joint Office website.

All technical issues are expected to be resolved at the non-voting meeting on 29/30 June 2016. The TAR NC's Entry into Force is anticipated to be 01 April 2017 (to be confirmed) and will be the start of the implementation phase. An updated Expected Timeline was illustrated.

Implementation timelines (across 2017 - 2019) for binding and indicative compliance were noted and explained, bearing in mind that not everything will be in place in the background (some consultations will still need to happen). The RPM consultation and approval cycle was anticipated to be concluded no later than 31 May 2019, but this was not realistic from a GB perspective (CH advised that GB needs to be on top of this before then).

CH observed that the timeline for implementation gave some boundaries to lay out over National Grid NTS' Phase 4 implementation plans. The first look at Phase 4 (changes required from a GB perspective and what work might need to be done) will be brought to the next Transmission Workgroup meeting.

#### 2.1.2 EU CAM Amendment (Incremental) Update

CH recapped on the further changes following the April Member States meeting:

*Article 11 (3):* This now allows existing and incremental to be offered within the same 15 year period.

Article 6 (1(a)(1)): This adds "in emergency situations the availability of capacities necessary for security of supply at interconnection points shall be ensured".

*Article 8 (2):* This adds that the approval of selling bundled capacity in competing auctions should be a coordinated approval by respective NRAs.

*Article 20b (6):* This adds that if the relevant NRAs do not reach agreement on the alternative allocation mechanism, ACER will decide on the alternative allocation mechanism to be implemented.

CH then outlined the main points raised by National Grid in respect of various Articles:

Article 7a: Path Based Capacity - GB only has a firm capacity product and no path based capacity products. Within GB, Users are able to apply for an NTS optional commodity charge (a discount to the standard commodity charge); this discount in the context of GB is often referred to as shorthaul. This is not a 'product' as firm = firm, this is a discounted rate. National Grid hopes to add appropriate text to avoid inefficient bypass of the Transmission System in Article 7a. National Grid believes that this change facilitates both path based products and/or discount rates.

Article 20d: withholding 10% of incremental capacity (20% for the alternative mechanism) - GB does not currently withhold a percentage of incremental capacity. This may result in Users not getting allocated the 100% incremental signal or in National Grid overbuilding by the 10 or 20%. National Grid supports a possible text change "national regulatory authorities shall set aside an amount up equal to 20% of

*the technical capacity*" or a deletion of this text. A landing on this has yet to be reached.

*Article 20b Design Phase:* National Grid supports a possible text change that the incremental processes may start at any time and not only after the annual yearly capacity auction

*Article 19a: Alignment of T&Cs* - TSOs to integrate the common terms into new transport contracts. National Grid proposes deletion of text.

Potential Rolling Quarterly Auction (in addition to the current Annual Quarterly auction: CH was not sure if there is a User demand for this additional new auction. National Grid proposes that if this is required then an appropriate lead time for implementation is needed, i.e. circa 2018/19.

*Article 27: Entry into Force*: CAM Regulation is already in force from 01 November 2015 so becomes directly applicable; appropriate dates need to be inserted into CAM.

#### Next Steps

Following two Comitology Meetings (June and September 2016), Entry into Force is anticipated in April 2017.

The EC's Stakeholder Survey on draft amendments to CAM NC was issued via the Joint Office on 24 May 2016, and the feedback deadline is 03 June 2016, to: ENER-GAS-COMMITTEE@ec.europa.eu.

Progression will continue alongside the TAR NC.

#### 2.1.3 EU Gas Quality Update

Referring to Actions TR0201 (*Reference EU Gas Quality Update* - National Grid NTS (PH/FH) to consider producing analysis that would show what volume of gas would have been locked out of GB in the last 12 months if the CEN standard had been applied at all NTS entry points, assuming base levels of O<sub>2</sub>) and TR0202 (*Reference EU Gas Quality Update* - National Grid NTS (PH/FH), in conjunction with Action TR0201, to consider the potential implications for transportation charges if supply patterns changed due to gas with higher levels of O<sub>2</sub> being locked out), and the May Workgroup's request that National Grid NTS pursue the oxygen analysis if this can be delivered within the ENTSOG consultation period, PH reported that National Grid NTS was continuing to work on this and it was hoped to publish by the July Workgroup .

#### Wobbe Index Harmonisation

PH reported on the CEN initial meeting for Wobbe Index harmonisation, noting that in the CEN document produced scope creep appeared to be evident, and that previous points raised by parties did not seem to have been addressed. It was still not clear what the deliverables are or what the total scope was. The M400 amendment had been accepted; other areas remained under review. There was not a lot of support from stakeholders to make the CEN standard binding. PH will continue to monitor events and progress.

**Post Meeting Note:** Following the meeting PH provided the CEN scoping document "Draft BUSINESS PLAN - CEN SFGas WG Pre-normative study of H-gas quality parameters" for publication. It is available to view at: www.gasgovernance.co.uk/tx/020616.

## ENTSOG Consultation on Issues and Impacts related to the CEN Gas Quality Standard

This consultation has been published on the Interoperability section of ENTSOG's website (http://www.entsog.eu/publications/interoperability) and the deadline for

responses is 15 July 2016. Advising that parties should answer questions relevant to themselves, PH asked if the questions (59) were sufficiently clear and indicated he would be happy to discuss if required.

#### 2.1.4 Gas Quality and Balancing Information Provision Consultation

The consultation closed on 20 May 2016. Three responses were received (parties providing were thanked) and these were currently being assessed. The outcomes and National Grid NTS' proposed way forward will be shared at the July 2016 Workgroup. Any questions or queries in respect of this consultation should be sent to jennifer.randall@nationalgrid.com.

#### 2.1.5 Future Topics

Monthly updates will continue to be provided in respect of the EU Tariffs Code, the Incremental Code, EU Gas Quality, and updates on EU Phase 4 implementation will also be included.

#### 2.2 Matters Arising

None raised for discussion.

#### 3. Workgroups

# 3.1 Modification 0581S - Amending the Oxygen content limit specified in the Network Entry Agreements at Grain LNG

The minutes of this meeting are available at: www.gasgovernance.co.uk/0581/020616. The Workgroup's Report is due to be made to the September UNC Modification Panel.

# 3.2 Modification 0582S - Amendments to reflect separation in legal ownership of NTS and National Grid owned LDZs to facilitate the sale of National Grid's Gas Distribution Business

The minutes of this meeting are available at: www.gasgovernance.co.uk/0582/020616. The Workgroup's Report is due to be made to the July UNC Modification Panel.

#### 4. Issues

## 4.1 ISS066 – Implications of decommissioned Exit/Entry points (transferred from NTSCMF)

FH confirmed that removing a site from the Licence is for National Grid NTS and Ofgem alone to consider. Where a site is identified for removal contact will of course be made with the relevant operating parties. National Grid NTS is identifying all sites that may fall into this category and will discuss with Ofgem. It is likely to be a single exercise for all sites involved (not piecemeal). Consideration will need to be given as to how that fits with the charging process, and FH gave a view on how they might be treated.

This is really carrying out a 'housekeeping' exercise in relation to decommissioned sites in the Licence, not connected to NTS, and that have no baseline/revenue driver or capacity booked.

FH expected to provide an update at the August Workgroup meeting to explain how it will all work.

Regarding the questions raised at the previous meeting, regarding substitution and prioritisation (decommissioned and exchange rates, discounted sites), FH indicated that he needed a better understanding of what Shippers meant. The Licence obligations were very clear and FH explained in detail. If there is a financial commitment to capacity it is available for substitution. GJ suggested that substitution as a whole needed to be looked at.

FH referred to the capacity methodology statement and the non-EU charging review, which was being looked at, advising that National Grid NTS will come to the July Workgroup with a timetable and potential scope of review, for discussion and views.

#### 5. Any Other Business

#### 5.1 Xoserve Funding, Governance and Ownership (FGO) - Update

SMc gave a brief update on the current position, drawing attention to the KPMG slide pack published for information. The informal consultation carried out on draft GT licence conditions to implement FGO closed on 26 May 2016. Ofgem will assess the outcome and then issue a formal consultation.

Work is progressing on a future industry governance model; National Grid Distribution had provided greater detail on proposals for a UNC Sub-Committee and industry feedback was sought.

Whether to charge Trader Users IX charges was under consideration.

In relation to Direct/Indirect Invoicing, the most appropriate mechanism was under discussion. There were two views apparent, with reasonably strong opposition to direct invoicing from ICOSS. Shippers were urged to consider their positions and enter the debate on this as soon as possible to ensure their views are known.

The next Cost Allocation and Charging Workgroup meeting will take place on 13 June 2016; this will provide Shippers with the most focused opportunity to feed into the process, rather than leave until a modification is issued for consultation.

#### 5.2 ENTSOG - 'Gas quality outlook over next 10 years'

As advised at the previous Workgroup meeting, ENTSOG is obliged under the Interoperability Code to produce a biennial Gas Quality Outlook Report, the first of which is to be published in December 2016 with the Ten Year Network Development Plan (TYNDP) for 2017. It was noted that the projection will combine TYNDP supply and demand scenarios with gas quality data gathered from TSOs for each EU transmission entry point, and that the outlook will assume that gas quality of each supply source will not change significantly with respect to the historical data gathered from TSOs. Wobbe Index and CV ranges will be produced for different regions.

The next TYNDP stakeholder session will take place in Brussels on 10 July 2016.

#### 5.3 Energy Balancing Credit Committee (EBCC) Membership - Reminder

RF gave a short presentation on potential changes to the formation of the Energy Balancing Credit Committee (EBCC).

EBCC membership can be up to a maximum of 9 shipper representatives, but for many years has not been operating at full strength (it currently comprises 6 Shipper members with alternates for 4); because of continuing low levels of representation by Shippers, the EBCC then took a decision to reduce its quoracy criterion from 5 to 3. Even at this lowered level and despite best efforts to encourage attendance, non-quorate meetings still occur; inquoracy can delay the decision making process and any delays carry wider implications for the industry as a whole, which RF then went on to explain.

In the event of an individual User failure, Shipper Users are jointly liable for any unpaid Energy Balancing Charges. The EBCC has a responsibility to protect the gas industry from avoidable financial loss and plays an important role in the development and application of the Energy Balancing Credit Rules (EBCR) and responding to User Failure Events. Without the EBCC and its ability to consider certain interim interventions, National Grid is obliged to act upon the steps outlined in UNC TPD Sections X and V in respect of User Failure, and this is not always the most appropriate way to protect the industry from avoidable financial loss and can result in organisations being terminated.

If, following the forthcoming User Representative nomination process, the situation does not improve the EBCC proposes to introduce a 'standing pool of independent experts' (with relevant expertise and experience), to sit alongside existing EBCC members. Their role will be to ensure quorate decisions (especially when necessary for emergency EBCC meetings), and to provide expert assistance on specific issues as required. It is anticipated that remuneration costs would be funded via Energy Balancing Neutrality and a modification will be required to enact this, potentially as early as July 2016.

In the meantime, RF urged Shippers to consider participation in EBCC, and he will also present this information at the Distribution Workgroup.

LJ added that the election process for the gas year 2016/17 is now underway (see information at: www.gasgovernance.co.uk/elections). Nominations to the EBCC would be very much welcomed.

#### 5.4 EU Phase 3 Issues

SN drew attention to the recent issues identified by Xoserve relating to incorrect invoicing for Moffat and Bacton. SN explained both issues in more detail and the remedy deployed in each case; all affected Shippers had been contacted.

Investigation into the Bacton issue was ongoing and conclusions will be communicated to the Ops Forum and to this Workgroup.

#### 5.5 Communications with Industry - Mailchimp Templates

FH referred to previous discussions relating to National Grid's communications with industry, advising that National Grid was looking at using Mailchimp (as used for EU Phase 2). A template will be provided to the Joint Office for publication on today's meeting page, and Shippers were encouraged to review for potential use and submit any views to FH.

#### 6. Review of Actions Outstanding

**TR0101:** *Reference EPDQD revisions after D+5* - National Grid NTS (AW) to consider the various options raised at the Workgroup and to attend a future Transmission Workgroup with a proposed solution.

**Update:** GD reported that a webinar was being held for Terminal Operators, to collect information. He expected to return to the July Workgroup with a way forward. **Carried forward** 

**TR0201:** *Reference EU Gas Quality Update* - National Grid NTS (PH/FH) to consider producing analysis that would show what volume of gas would have been locked out of GB in the last 12 months if the CEN standard had been applied at all NTS entry points, assuming base levels of O<sub>2</sub>.

Update: See 2.1.3, above. Closed

**TR0202:** *Reference EU Gas Quality Update* - National Grid NTS (PH/FH), in conjunction with Action TR0201, to consider the potential implications for transportation charges if supply patterns changed due to gas with higher levels of  $O_2$  being locked out.

Update: See 2.1.3, above. Closed

**TR0401:** *Implications of decommissioned Exit/Entry points* - National Grid NTS (FH) to discuss with Ofgem if this matter should be discussed at the next Ofgem period review.

**Update:** See 4.1, above. FH advised that he had no internal mandate to discuss with Ofgem, but it was hoped that reference here would be sufficient to raise awareness. **Carried forward** 

**TR0402:** National Grid NTS (PH) to investigate Negative Implied Flow Rate and Deemed Flow faxes with the adjacent TSOs and suggest possible ways forward.

**Update:** PH gave a brief presentation, reporting that National Grid NTS was continuing to investigate issues and engaging with GNI(UK) regarding a potential amendment to the matching rule at Moffat.

Request for Information letters have been issued and a number of responses received. PH outlined the main reasons for Shippers requesting a downward re-nomination that breached the NIFR rule.

Work is continuing to identify an acceptable way forward.

At the last meeting Shippers had asked National Grid NTS to consider a reinstatement of the fax process. PH advised that this was not as simple as it sounds and was being discussed with the Xoserve Operations Team. Brief details of the process were given. National Grid NTS was looking to see if it can facilitate something at Bacton IPs for the interim, before an enduring solution is identified. An update will continue to be provided to the Ops Forum. PH recognises the concerns for Shippers in managing their imbalance positions. LM expressed disappointment with the lack of progress, observing that the issue had been raised last November, and it would be encouraging to see something put in place for the short term as soon as possible. **Carried forward** 

**TR0501:** AM to organise a cross-party teleconference (Ofgem, Shippers, DECC) prior to 10 May to discuss topics of concern: short haul, grandfathering rights, multipliers at IPs - because of implications for non-IPs, and storage).

**Update:** A meeting was arranged for 09 May 2016 and details circulated to the Transmission Workgroup participants (on 06 May via the Joint Office). **Closed** 

**TR0502:** *EU Gas Change Phase 4* - National Grid NTS to provide an update on progress at July Transmission Workgroup.

Update: To be addressed at the July meeting, within the EU Update pack. Carried forward

#### 7. Diary Planning

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

Agenda items (and any associated papers) for the July meeting should be submitted to the Joint Office by close of play on 28 June 2016.

#### System Flex Workshop - Rearrangement of meeting

The Workgroup was asked to note that National Grid NTS' System Flex Workshop meeting had been rearranged to take place on 07 July 2016 (following the Transmission Workgroup meeting). It was therefore anticipated that the July Transmission Workgroup would conclude its business by 13:00.

Time/Date	Location	
<b>10:00 - 13:00</b> , Thursday 07 July 2016	Elexon, 350 Euston Road, London NW1 3AW	
10:00, Thursday 04 August 2016	Elexon, 350 Euston Road, London NW1 3AW	
10:00, Thursday 01 September 2016	Elexon, 350 Euston Road, London NW1 3AW	
10:00, Thursday 06 October 2016	Elexon, 350 Euston Road, London NW1 3AW	
10:00, Thursday 03 November 2016	Elexon, 350 Euston Road, London NW1 3AW	
10:00, Thursday 01 December 2016	Elexon, 350 Euston Road, London NW1 3AW	

#### Action Table (02 June 2016)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
TR0101	07/01/16	5.4	Reference EPDQD revisions after D+5 - National Grid NTS (AW) to consider the various options raised at the Workgroup and to attend a future Transmission Workgroup with a proposed solution.	National Grid NTS (GD)	Carried forward (Due at 07 July meeting)
TR0201	04/02/16 (amende d 05/05/16)	2.2	Reference EU Gas Quality Update - National Grid NTS (PH/FH) to consider producing analysis that would show what volume of gas would have been locked out of GB in the last 12 months if the CEN standard had been applied at all NTS entry points, assuming base levels of $O_2$ and $CO_2$ .	National Grid NTS (PH/FH)	Closed
TR0202	04/02/16 (amende d 05/05/16)	2.2	Reference EU Gas Quality Update - National Grid NTS (PH/FH), in conjunction with Action TR0201, to consider the potential implications for transportation charges if supply patterns changed due to gas with higher levels of $CO_2$ and $O_2$ being locked out.	National Grid NTS (PH/FH)	Closed

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
TR0401	07/04/16	4.1	Implications of decommissioned Exit/Entry points - National Grid NTS (FH) to discuss with Ofgem if this matter should be discussed at the next Ofgem period review.	National Grid NTS (FH)	Carried forward (Due at 07 July meeting)
TR0402	07/04/16	5.2	National Grid NTS (PH) to investigate Negative Implied Flow Rate and Deemed Flow faxes with the adjacent TSOs and suggest possible ways forward.	National Grid NTS (PH)	Carried forward (Due at 07 July meeting)
TR0501	05/05/16	2.1.2	AM to organise a cross-party teleconference (Ofgem, Shippers, DECC) prior to 10 May to discuss topics of concern: short haul, grandfathering rights, multipliers at IPs - because of implications for non-IPs, and storage).	Ofgem (AM)	Closed
TR0502	05/05/16	2.1.3	<i>EU Gas Change Phase 4 -</i> National Grid NTS to provide an update on progress at July Transmission Workgroup.	National Grid NTS (PH)	Carried forward (Due at 07 July meeting)

### Action Table (02 June 2016)