










UNC Modification		At what stage is this document in the process?
<h1>UNC 0662:</h1> <h2>Revenue Recovery at Combined ASEPs.</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #008000; color: white; padding: 2px; border-radius: 4px;">01 Modification</div> <div style="border: 1px solid #0070C0; background-color: #e6f2ff; padding: 2px; border-radius: 4px;">02 Workgroup Report</div> <div style="border: 1px solid #9933CC; background-color: #f2e6ff; padding: 2px; border-radius: 4px;">03 Draft Modification Report</div> <div style="border: 1px solid #FF9900; background-color: #fff9e6; padding: 2px; border-radius: 4px;">04 Final Modification Report</div> </div>
<p>The purpose of this modification is to allow entry capacity booked for the entry of gas into the NTS from storage sites within combined Aggregated System Entry Points (ASEPs) to be treated the same as a "Storage Site" as designated in National Grid's Licence with respect to the application of any revenue recovery charge based on capacity bookings.</p>		
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> <li>considered a material change and not subject to self-governance</li> <li>assessed by a Workgroup</li> </ul> <p>This modification will be presented by the Proposer to the Panel on 21 June 2018.</p> <p>The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>	
	<p>High Impact: Shippers and National Grid NTS</p>	
	<p>Medium Impact: None</p>	
	<p>Low Impact: None</p>	

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Timetable		 0121 288 2107
<b>The Proposer recommends the following timetable:</b>		Proposer: <b>Colin Hamilton</b>
Initial consideration by Workgroup	05 July 2018	 colin.j.hamilton@nationalgrid.com
Workgroup Report presented to Panel	18 April 2019	 01926653423
Draft Modification Report issued for consultation	19 April 2019	Transporter: <b>National Grid</b>
Consultation Close-out for representations	21 June 2019	Systems Provider: <b>Xoserve</b>
Final Modification Report available for Panel	25 June 2019	 <a href="mailto:commercial.enquiries@xoserve.com">commercial.enquiries@xoserve.com</a>
Modification Panel decision	18 July 2019	

## 1 Summary

### What

This modification proposal seeks to align the treatment of historic entry capacity associated with storage points within a combined ASEP to that of points identified as storage points in the Transporter's Licence with respect to any revenue recovery charge based on capacity.

### Why

UNC 0621 and some of its alternates proposes to introduce a capacity-based revenue recovery charge at interconnection points from 1 October 2019 and at all points from 1 October 2021. Any historic capacity at storage sites shall be exempt from this charge. UNC 0501 split the capacity at Bacton ASEP and created two new points: Bacton IP and Bacton UKCS. This resulted in some capacity procured for storage purposes at Bacton being reallocated to both Bacton IP and Bacton UKCS. If no action is taken, then all booked capacity at Bacton IP shall attract the capacity-based revenue recovery charge from 01 October 2019 and at Bacton UKCS from 01 October 2021. There may be other ASEPs impacted by this potential change.

### How

Where entry capacity has been identified as procured for storage purposes within an ASEP that is not classified as a storage facility with in National Grid's Licence, it is proposed that an adjustment be made to the calculation of a relevant User's Fully Adjusted Available Entry Capacity when calculating any capacity-based revenue recovery charge.

## 2 Governance

### Justification for Self-Governance

Authority direction is proposed because this Modification seeks to preserve alignment in the treatment of shippers who have procured capacity for entering gas into the NTS from storage sites. This UNC modification introduces a transitional arrangement as any entry capacity impacted by this UNC modification is already existing and it is not foreseen that the situation being addressed here could occur in the future due to the Planning & Advanced Reservation of Capacity Agreement (PARCA) process.

If implemented, it may not have a material impact on the allocation of charges across NTS Network Users. Workgroup will be asked as part of the development whether the Modification could potentially be considered for self-governance as the impact is further assessed and detailed during Workgroup Development.

### Requested Next Steps

This modification should:

- Be considered a material change and not subject to self-governance; and
- Be issued to Workgroup for assessment.

### 3 Why Change?

UNC Modification 0621 and a number of its alternatives proposes the introduction of a capacity-based revenue recovery charge at interconnection points from 1 October 2019 and at all points from 1 October 2021. Any existing capacity at storage sites shall be exempt from this charge. This shall replace the current flow-based revenue recovery charge. At present, if capacity procured for the purpose of storage is not flowed against then no revenue recovery charge is applied. An issue arises as there are situations where capacity was procured for storage purposes at sites that include other sources of gas and are therefore not classed as storage sites within the Licence. If no action is taken, then all booked capacity at such sites shall attract the capacity-based revenue recovery charge. This creates an asymmetry of treatment between shippers holding capacity at ASEPs listed as storage sites within National Grid's Licence and shippers holding capacity procured for the purpose of operating a storage site within an ASEP not designated as a storage site within the Licence.

A specific case is capacity booked at Bacton (both IUK and IP) that was bought for storage projects that have now been abandoned. Some capacity bought for the storage project at Bacton may have been reallocated to Bacton IP as part of the methodology used in the Bacton split (UNC 0501 see: <https://www.gasgovernance.co.uk/0501> ).

### 4 Code Specific Matters

#### Reference Documents

**Revenue recovery charge based on capacity:**

<https://www.gasgovernance.co.uk/index.php/0621>

**Bacton split:**

<https://www.gasgovernance.co.uk/index.php/0501>

#### Knowledge/Skills

An understanding of the proposed changes arising from the Charging Review,

### 5 Solution

Where there is capacity procured for storage purposes within an ASEP, it is proposed that an adjustment is made to the calculation of a relevant User's Fully Adjusted Available Entry Capacity (a parameter currently used for determining overruns) for calculating any capacity-based revenue recovery charge. For

the avoidance of doubt, the overrun calculation will not be affected, it is only the Fully Adjusted parameter that may be adjusted when calculating any capacity-based revenue recovery charge.

The key challenge here is to identify the capacity quantity within a combined ASEP that is exempt from the revenue recovery charge. This quantity shall be the Applicable Registered NTS Entry Capacity associated with storage.

It is proposed that the identification of such relevant capacity shall be undertaken as a one-off application process.

In this application process, Users shall submit a quantity associated with their existing NTS Entry Capacity rights held that were allocated before the Effective Date as referenced in UNC Modification 0621 (or one of its alternatives) applicable to Gas Year 2019 and beyond for Bacton IP and Gas Year 2021 for all other points

This capacity would be held for each quarter from the relevant applicable date for which they wish such quantity to be considered for exclusion from any capacity based revenue recovery charge on the basis that it was procured to ensure entitlement to deliver gas into the NTS from a storage facility within an ASEP not listed as a storage site within National Grid's Transporter's Licence.

### High level view of the assessment process

1. Within [10] business days of the implementation of this Modification, National Grid NTS will invite all Users who at that time hold Registered Entry Capacity from 1 October 2019 onwards to indicate what quantity of their Registered Entry Capacity and duration from the relevant applicable date they wish to be assessed as being exempt from any capacity-based revenue recovery charge due to the capacity being procured to allow gas to enter the National Transmission System from a storage facility. NTS Capacity Transfers shall not be include in this process.
2. The invitation shall state,
  - I. The date within [10] business days of the invite and means by which Users can signal the required quantities to be assessed for each relevant Quarter.
  - II. The period for which User requests can be sent, (for each Business Day Users can submit their requests between 08:00am and 17:00pm):-
  - III. That a User cannot request assessment of a quantity greater than their Registered NTS Entry Capacity for the Quarter in question at each ASEP relevant to their application. For clarity, a User can request assessment of a quantity lesser than their Registered NTS Entry Capacity.
  - IV. The User to provide a quantity for assessment by ASEP by Quarter to National Grid NTS.
  - V. [Any relevant documentation to support their application (The nature of such documentation that is considered relevant shall be detailed in the invitation letter).]
  - VI. The date by which National Grid NTS will provide feedback to Users the result of the assessment.
3. If a User does not respond to the Invitation by the date indicated, National Grid NTS will assume that the User has no Registered NTS Entry Capacity they wish to be assessed as being exempt

from any capacity-based revenue recovery charge due to the capacity procured to allow gas to enter the National Transmission System from a storage facility.

4. Within [x] Business days after the date by which Users need to respond to the Invitation, National Grid NTS will undertake the assessment and notify each relevant User of the outcome.

5. The assessment process shall ~~include~~ be detailed in the invitation letter. For clarity, this shall involve, as a minimum, comparing the requested quantities for exemption to any relevant Feasibility Study Report performed by National Grid NTS for a storage project that was subsequently abandoned. For storage sites that are no longer commercially active as such, the assessment process shall involve, but may not be limited to, comparing the quantities requested for exemption with levels of quarterly capacity booked at the ASEP prior to the announcement of the relevant system entry point ceasing to function as a storage site. -

6. Following the completion of the assessment process, National Grid NTS will set the quantity of the relevant User's registered NTS Entry Capacity that is exempt from the any capacity-based revenue recovery charge for the relevant Quarter at the relevant ASEP.

7. National Grid NTS shall write to relevant Users to inform them of the results of the assessment process which will show the aggregate of the User's exempt quantities for each relevant ASEP in the form detailing:

I. Relevant Quarters

II. ASEP

III. Quantity in kWh/day exempt.

8. Where the User believes that the Transporter's assessment of the applicable exempt quantity is materially inaccurate, the User shall as soon as reasonably practicable after receiving the written information of the exempt quantity contact National Grid NTS to discuss the assessment outcome or basis for the assessment with a view to agreeing upon a revised quantity.

9. Without prejudice to the previous paragraph, National Grid NTS will update its computer system(s) with the above details within [10] Business Days of writing to Users to inform them of the exempt quantities.

10. National Grid NTS will then publish the aggregate results as a percentage of aggregate Registered System Entry Capacity ("or, aggregate System Entry Forecast Contracted Capacity") applicable until at least the end of the gas year following the annual capacity auction.

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### Adjustment process to the Fully Adjusted Entry Capacity

Any exemption quantity determined in the agreed process can then be applied to the calculation of the Fully Adjusted entitlement of any relevant shipper. The exempt quantity shall be adjusted for any transfers out of entitlement. This assumes that any capacity entitlement associated with an abandoned storage project shall be transferred before any other capacity held by the shipper.

The algorithm for the User's fully adjusted capacity qualified for revenue recovery shall be:

$$F_{RR} = \max(0, (F_{adj} - \max(0, (A - T_{out}))))$$

Where,

$F_{RR}$  = User's fully adjusted capacity qualified for revenue recovery

$F_{adj}$  = User's net capacity entitlement (Registered capacity adjusted for transfers in and out)

$A$  = Abandoned Capacity as identified through an application and assessment process

$T_{out}$  = Transfers out (trades, surrenders, buybacks, options etc..)

Users will be liable to pay any capacity based revenue recovery charge from 1 October 2019 based on the revised Fully Adjusted Entry Capacity quantities.

## 6 Impacts & Other Considerations

**Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?**

N/A

### Consumer Impacts

This is likely to be immaterial as this proposed modification simply maintains the exemption of shippers at storage sites to any revenue recovery charge.

### Cross Code Impacts

None identified.

### EU Code Impacts

None identified.

### Central Systems Impacts

To be discussed during the development of this modification proposal, but there may be impacts on Gemini.

## 7 Relevant Objectives

Impact of the modification on the Relevant Objectives:

Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
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.	None
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.	None
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.	Positive

Impact of the modification on the Relevant Charging Methodology Objectives:	
Relevant Objective	Identified impact
a) Save in so far as paragraphs (aa) or (d) apply, that compliance with the charging methodology results in charges which reflect the costs incurred by the licensee in its transportation business;	None
aa) That, in so far as prices in respect of transportation arrangements are established by auction, either: (i) no reserve price is applied, or (ii) that reserve price is set at a level - (I) best calculated to promote efficiency and avoid undue preference in the supply of transportation services; and (II) best calculated to promote competition between gas suppliers and between gas shippers;	None
b) That, so far as is consistent with sub-paragraph (a), the charging methodology properly takes account of developments in the transportation business;	Positive
c) That, so far as is consistent with sub-paragraphs (a) and (b), compliance with the charging methodology facilitates effective competition between gas shippers and between gas suppliers; and	Positive
d) That the charging methodology reflects any alternative arrangements put in place in accordance with a determination made by the Secretary of State under paragraph 2A(a) of Standard Special Condition A27 (Disposal of Assets).	None
e) 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.	Positive

Demonstration of how the Relevant Objectives are furthered:



Standard Relevant Objectives:

c) Efficient discharge of the licensee's obligations.

The proposed solution supports the implementation of changes to an updated set of charging arrangements. Standard Special Condition A5(5) of the Licence sets out the relevant methodology objectives and National Grid believes that these objectives are better facilitated for the reasons outlined below ('Relevant Charging Methodology Objectives').

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.

The EU Tariff Code compliance is in this modification proposal.

Relevant Charging Methodology Objectives:

b) That, so far as is consistent with sub-paragraph (a), the charging methodology properly takes account developments in the transportation business.

The proposed solution takes into account developments which have taken place in the transportation business, in particular the introduction of discounts for certain classification of capacity introduced by the EU Tariff Code.

c) That, so far as is consistent with sub-paragraphs (a) and (b), compliance with the charging methodology facilitates effective competition between gas shippers and between gas suppliers; and the proposed solution takes into account developments which have taken place in the transportation business, in particular the introduction of discounts for certain classification of capacity introduced by the EU Tariff Code.

e) 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.

The EU Tariff Code compliance is in this modification proposal.

## 8 Implementation

No implementation timescales proposed at the moment, these will be discussed within the workgroups

This modification and the resulting methodology change will take effect for prices from October 2019, in order to maintain the alignment in the treatment of entry capacity associated with storage.

## 9 Legal Text

### Text Commentary

To be provided later

### Text

To be provide later

## 10 Recommendations

### Proposer's Recommendation to Panel

Panel is asked to:

- Be considered a material change and not subject to self-governance; and
- Be referred to a Workgroup for assessment.