














UNC Final Modification Report	At what stage is this document in the process?
<h1>UNC 0759S:</h1> <h2>Enhancements to NTS Within-Day Firm Entry and Exit Capacity Allocations</h2>	<div> <div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>This Modification seeks to enhance the existing schedule of allocations for within-day NTS Firm Capacity products to allow Users greater access and flexibility to purchase NTS Capacity.</p>	
	<p>The Panel determined that this Self-Governance Modification be implemented.</p>
	<p>High Impact: None</p>
	<p>Medium Impact: All NTS Users, NTS</p>
	<p>Low Impact: None</p>

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Timetable		 Contact:
Modification timetable:		Joint Office of Gas Transporters
Initial consideration by Workgroup	01 April 2011	 enquiries@gasgovernance.co.uk
Workgroup Report presented to Panel	20 May 2021	 0121 288 2107
Draft Modification Report issued for consultation	20 May 2021	Proposer:
Consultation Close-out for representations	11 June 2021	Anna Stankiewicz
Final Modification Report available for Panel	15 June 2021	National Grid NTS
Modification Panel decision	17 June 2021 (<i>to be considered at short notice</i>)	 anna.stankiewicz@nationalgrid.com
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1 Summary

What

The Capacity regime incentivises Users to align their Capacity bookings to flows. Discussions within Workgroup 705R have highlighted that the current Exit within-day Firm product can hinder this alignment as it only allocates Capacity 5 times throughout the Gas Day at 08:00, 14:00, 18:00, 22:00 and 01:00.

Since the implementation of UNC Modification 0678A “Amendments to Gas Transmission Charging Regime” on 1st October 2020 which resulted in an increase to Capacity reserve prices and the removal of the zero priced Capacity, the incentive to align Capacity to flow has increased.

Currently, the last allocation for both NTS Entry and Exit Capacity is at 01:00 in the Gas Day. This prevents Users being able to secure Capacity in the final 4 hours of the Gas Day. This is further hampered by the closure of the bid window at 00:00 for NTS Exit Capacity and 01:00 for NTS Entry Capacity.

Users currently have no formal timescales of when they are to be notified of their NTS Exit Capacity allocation which can create uncertainty.

Why

NTS directly connected customers expressed the need to have more frequent NTS Exit Capacity allocations as this would allow them greater flexibility to react to market conditions. For example, gas fired power generation is increasingly acting as a back-up to renewable electricity generation. Accessing NTS Exit Capacity in a more responsive manner is fundamental when conditions for renewable generation change (i.e. the wind stops blowing). The limited number of NTS Exit Capacity allocations currently available in the within-day NTS Exit product does not provide frequent enough opportunity for NTS Exit Capacity to be secured by NTS customers.

The ability to request the Capacity later in the Gas Day will enable Users to better match their Capacity bookings with their flows at the time when there can be a significant degree of activity. To maximise the benefit of the later allocation the bid invitation window requires extending to enable Users to submit bids closer to allocation.

Lastly, this proposal is introducing the concept of a Capacity Allocation Period for Exit. Currently the NTS obligation to allocate Capacity within specific period exists on Entry only (UNC section B2.4.15 (c)). Introduction of similar NTS commitment on Exit will give Users more assurance that the Capacity booked will be allocated within a specific timeframe.

How

This Modification proposal seeks to amend the schedule of allocations for NTS Entry and Exit within-day Firm Capacity in the following ways;

1. introduce hourly allocations for NTS Exit Capacity;
2. allow additional NTS Entry and Exit Capacity allocation at 02:00;
3. extend the NTS Entry and Exit Capacity bid invitation windows up until the time of the last allocation;
4. introduce a 30-minute Capacity Allocation Period for NTS Exit Capacity.

2 Governance

Justification for Self-Governance

This Modification seeks to make enhancements to the current NTS Entry and Exit within-day Capacity products. The changes proposed do not include amendment to the volume of Capacity offered or the Capacity prices, therefore this proposal does not have a material impact on competition or the commercial arrangements between Transporters and Users and therefore meets the Self-Governance criteria.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup for a period of 3 months.

3 Why Change?

The main driver behind the Modification is to enable all Users to better align their Capacity bookings with their flows. Since 1st October 2020 implementation of Modification 0678A “Amendments to the Gas Transmission Charging Regime” utilisation of Firm Capacity has approximately doubled (from 30-40% to 60-70%). More customers seek to purchase Capacity efficiently and therefore avoid unnecessary costs i.e. avoid booking Capacity which they will not flow against. The current 5 Exit allocations within the Gas Day provide limited opportunity to procure additional Capacity. It is therefore desirable for the daily product to allocate more frequently. This will reduce the risk of over-purchasing NTS Exit Capacity (and therefore reduce the costs) and sterilising NTS Exit Capacity. Furthermore, the change will reduce the risk of overrunning by providing an opportunity to fine-tune NTS Exit Capacity bookings. Over or under purchasing of Capacity can result in increased costs to end consumers.

National Grid NTS currently has the ability under UNC to elect ad-hoc within-day Capacity allocations and have done so for NTS Exit Capacity on one occasion since 1st October 2020 where there was a number of bids awaiting allocation. However, with this being an ad-hoc process it does not provide certainty to Users that this additional allocation will take place.

The proposed changes introduce an additional Capacity allocation at 02:00 and extend the bid invitation window up until this time for both NTS Entry and Exit Capacity, enabling Users to secure Capacity later in the Gas Day.

There is currently no UNC rule stating within what timeframe NTS Exit within-day Capacity must be allocated to Users. Introduction of the 30 minutes Capacity Allocation rule will give Users more certainty over the Capacity allocation process and will enable better planning of their physical flows.

4 Code Specific Matters

Reference Documents

[UNC TPD Section B](#)

5 Solution

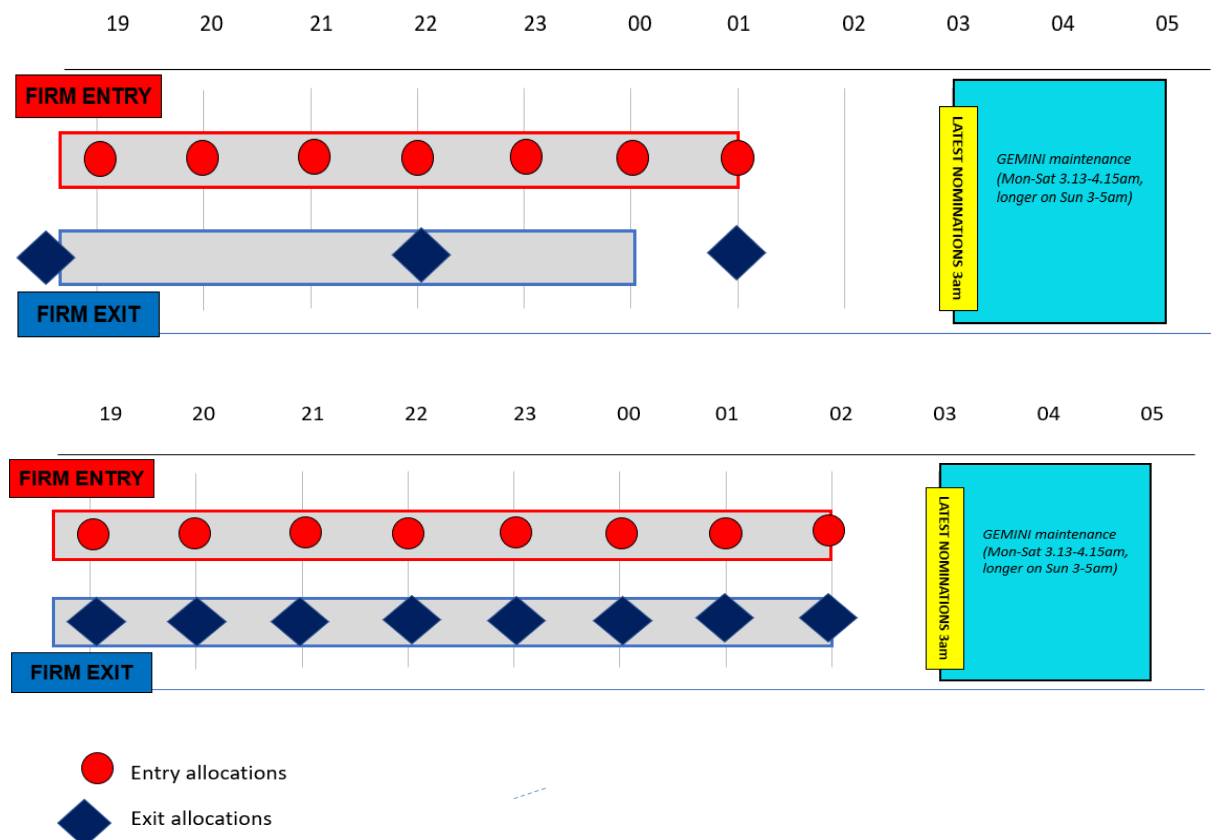
The solution can be distilled into 4 parts:

1. enable within-day hourly allocations for NTS Exit Firm Capacity from 06:00 until 02:00;
2. allow additional NTS Entry with-day Capacity allocation at 02:00;
3. extend both the NTS Entry and Exit within-day Capacity bid invitation windows up until 02:00;
4. introduce a 30-minute Capacity Allocation Period for NTS Exit Capacity.

The table below sets out current rules around daily products and the proposed solutions.

		Current product	Proposed UNC change
Entry (WDDSEC)	Allocations	Hourly	No change
	Last allocation	01:00	02:00
	Capacity invitation window end	01:00	02:00
	Capacity Allocation Period	15min	No change
Exit (WDDNEX)	Allocations	08:00, 14:00, 18:00, 22:00, 01:00	Hourly allocations
	Last allocation	01:00	02:00
	Capacity invitation window end	00:00	02:00
	Capacity Allocation Period	N/A	30min

The above is demonstrated by the following chart with the end of the day focus for clarity:



For avoidance of any doubt, this proposal is not seeking to amend start times for NTS Capacity invitation windows within the NTS Entry/Exit Capacity auctions. Furthermore, the changes proposed are not intended to be applicable to interconnection points.

6 Impacts & Other Considerations

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

No SCR or other significant change project will be required as an outcome of this proposal.

Consumer Impacts

Proposer’s view:

Implementation of this Modification is likely to reduce the cost of NTS utilisation by enabling Users to book Capacity more effectively.

Workgroup Participant’s view:

This is captured in table 1 below.

Table 1: Consumer Impact Assessment Table

Consumer Impact Assessment <i>(Workgroup assessment of proposer initial view or subsequent information)</i>	
Criteria	Extent of Impact
Which Consumer groups are affected?	Primarily <ul style="list-style-type: none"> • Mainly Large non-domestic Consumers • Non-domestic Consumers • Electricity consumers
What costs or benefits will pass through to them?	<p>Some Workgroup Participants believed that implementation of this Modification will improve access to capacity during the operational hours required and thus the system change costs shown above are likely to being about improvements to the processes for Shippers.</p> <p>Implementation of this Modification will enable Shippers to book capacity which better reflects their actual usage thus it makes the processes more cost efficient, allowing potential savings to be passed through to the customer and eventually the consumer.</p> <p>Reducing the costs of generating because capacity can be matched more closely to generation will mean such items as penalty changes can be avoided. Reduced charges should result in more efficient or cost effective bids into the electricity market, which ultimately could benefit electricity consumers.</p> <p>Materiality of these cost savings is difficult to quantify but could be reasonably significant since without this Modification, overbooking of capacity or overrun charges are difficult to avoid.</p>
When will these costs/benefits impact upon consumers?	Upon implementation.
Are there any other Consumer Impacts?	None identified
General Market Assumptions as at December 2016 <i>(to underpin the Costs analysis)</i>	
<i>Number of Domestic consumers</i>	<i>21 million</i>
<i>Number of non-domestic consumers <73,200 kWh/annum</i>	<i>500,000</i>
<i>Number of consumers between 73,200 and 732,000 kWh/annum</i>	<i>250,000</i>
<i>Number of very large consumers >732,000 kWh/annum</i>	<i>26,000</i>

Cross Code Impacts

None identified.

EU Code Impacts

None identified.

Central Systems Impacts

Proposer's view:

Gemini system change has been initially identified by Xoserve (estimate cost: £98-135K, 12 weeks delivery time). This covered addition of 02:00 allocation period on NTS Entry and Exit, extension to the bid window up until the last allocation and introduction of hourly allocations on NTS Exit.

National Grid believes that the introduction of hourly NTS Exit allocations warrants a review of Gemini functionality in relation to within-day Firm bid processing. It is deemed essential to automate some of the processes and make them more efficient.

Rough Order of Magnitude (ROM) Assessment *(Cost estimate from CDSP)*

ROM (XRN5278) was published on 28/04/2021 here: <https://www.gasgovernance.co.uk/0759>

Cost estimate:

Option A

An enduring solution will cost at least £95,000, but probably not more than £130,000 to implement.

Option B

An enduring solution will cost at least £110,000, but probably not more than £145,000 to implement.

Option C

An enduring solution will cost at least £115,000, but probably not more than £150,000 to implement.

Option D

An enduring solution will cost at least £110,000, but probably not more than £145,000 to implement.

Option E

An enduring solution will cost at least £110,000, but probably not more than £145,000 to implement.

Timeline:

Option A

The high-level estimate to develop and deliver this change is approximately 10 to 12 weeks for Analysis through to Post Implementation Support.

Option B

The high-level estimate to develop and deliver this change is approximately 12 to 14 weeks for Analysis through to Post Implementation Support.

Option C

The high-level estimate to develop and deliver this change is approximately 12 to 14 weeks for Analysis through to Post Implementation Support.

Option D

The high-level estimate to develop and deliver this change is approximately 12 to 14 weeks for Analysis through to Post Implementation Support.

Option E

The high-level estimate to develop and deliver this change is approximately 12 to 14 weeks for Analysis through to Post Implementation Support.

ROM Update

On 06 May 2021 National Grid and the CDSP confirmed that a revised ROM would be forthcoming and that the appropriate timescale for this Modification would be 16-18 weeks and a cost range of £200,000-250,000.

Workgroup Participant's view:

Some Workgroup Participants believed that implementation of this Modification will improve access to capacity during the operational hours required and thus the system change costs shown above are likely to be about improvements to the processes for Shippers.

Implementation of this Modification will enable Shippers to book capacity which better reflects their actual usage thus it makes the processes more cost efficient allowing potential savings to be passed through to the customer and eventually the consumer.

Workgroup Impact Assessment

Workgroup Participants discussed the Panel question:

- Consider Consumer benefits of this Modification

Workgroup Participants discussed this question and the results are captured in Table 1 above, under Consumer Impacts.

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.	Positive
b) Coordinated, efficient and economic operation of <ul style="list-style-type: none"> (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.	None
d) Securing of effective competition: <ul style="list-style-type: none"> (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation 	Positive

arrangements with other relevant gas transporters) and relevant shippers.	
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.	None

Proposer's view

This proposal better facilitates the following Relevant Objectives:

a) the introduction of hourly allocation windows for NTS Firm Exit Capacity and an additional allocation window for both NTS Firm Entry and Exit Capacity at 02:00 will provide Users with more opportunity to efficiently purchase Capacity that better reflects their anticipated gas flows leading to more efficient operation of the system.

d) additional allocation windows for the procurement of NTS Capacity provides Users with greater opportunity to match NTS Capacity bookings to intended flow. This has the effect of reducing User risk of acquiring unwanted NTS Capacity leading to more being available for other Users, conversely, reducing the risk of under-booking Capacity and exposure to overruns. Any reduction in costs to Users will additionally facilitate competition and it may potentially reduce the cost to consumers.

Workgroup Participant's view

Workgroup Participants noted that the Modification is applicable to Entry and Exit and therefore the benefits would be seen at both Entry and Exit.

Workgroup Participants agreed with the views of the Proposer above in regards to the Relevant Objectives a) and d).

8 Implementation

As Self-Governance procedures are proposed implementation could be as soon as sixteen business days following a Modification Panel decision to implement, subject to no appeal being raised. However, this may not be possible due to system impacts and therefore no implementation timescales are proposed at this stage. Potential implementation timescales will be clearer once an updated ROM capturing required Gemini changes to within-day bid processing is received.

9 Legal Text

Legal Text has been provided by National Grid and is published alongside this report here:

<https://www.gasgovernance.co.uk/0759>

The Workgroup considered the Legal Text on 06 May 2021 and is satisfied that it meets the intent of the Solution.

10 Consultation

Panel invited representations from interested parties on 20 May 2021. The summaries in the following table are provided for reference on a reasonable endeavours' basis only. It is recommended that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Implementation was unanimously supported in the 7 representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
Centrica Energy Limited	Support	a) - positive d) - positive	<ul style="list-style-type: none"> • Agree with the proposer that implementation of this modification promotes efficient and economic operation by enabling Shippers to better manage their Firm Entry and Exit Capacity requirements in a timely manner against their actual flow, thereby reducing overcapacity purchases and/or overrun charges. Having shorter lead time to allocation for Exit Capacity and adding an extra hour to the auction windows will reduce the amount of Operational Risk carried within and between shift teams (especially out of business hours), promoting better competition between relevant shippers. • Agrees this modification should be Self-Governance. • Implementation should be as soon as possible. • Does not envisage any costs for ourselves from this modification.
Equinor	Support	a) - positive d) - positive	<ul style="list-style-type: none"> • Equinor supports this modification because it widens the existing capacity booking windows enabling more flexibility for shippers which should lead to greater accuracy in matching bookings with flows. • Agrees this modification should be Self-Governance. • Implementation should be as soon as possible. • Believes the legal text delivers the intent of the solution.
National Grid NTS	Support	a) - positive d) - positive	<ul style="list-style-type: none"> • The Modification proposal aims to enhance the frequency at which capacity is made available by making the existing within day NTS Firm Entry and Exit capacity products more regularly accessible for purchase and therefore allowing Users the opportunity to book capacity at more frequent intervals throughout and at the end of the delivery period. • The introduction of hourly allocation windows for NTS Firm Exit Capacity and an additional allocation window for both NTS Firm Entry and Exit Capacity at the end of the Gas Day

			<p>will provide Users with more opportunity to purchase Capacity that better reflects their anticipated gas flows leading to more efficient operation of the system.</p> <ul style="list-style-type: none"> • The additional allocation windows for the purchase of NTS Capacity provides Users with greater ability to match NTS Capacity bookings to intended flow. This has the effect of reducing User risk of acquiring unwanted NTS Capacity leading to more being available for other Users. On the contrary, less stranded capacity will reduce the risk of under-booking Capacity and the potential exposure to overruns. Any reduction in costs to Users will facilitate competition and therefore further Relevant Objective (d), additionally it may then lead to a reduction in cost to consumers. • The changes introduced in this Modification do not amend the volume of Capacity offered or the reserve price. The proposal only increases the frequency at which Capacity is made available to Users therefore this proposal does not have a material impact on competition or the commercial arrangements between Transporters and Users and meets the Self-Governance criteria. • There are considerable system changes required as a part of the implementation of this modification. An estimated delivery in the ROM is 16-18 weeks plus a 3-month lead time for start-up/sanction/mobilisation. Due to this timeline, implementation of the legal text into the UNC needs to be considered. We see that there are two options; <ol style="list-style-type: none"> 1. Upon decision to implement the modification (or following the 16 days appeals window). In this situation the legal text would appear in the UNC but the physical ability to use the amended products would not be available until the system solution is implemented; or, 2. Upon implementation of the system changes. In this situation the legal text would appear in the UNC when the amended products are physically available to use in the system, removing the period of having an unusable section of the code. • National Grid's preferred option is to implement the legal text at the same time as the system changes (i.e. option 2) and therefore, should this modification be approved, National Grid NTS proposes implementation should follow these steps: <ul style="list-style-type: none"> • Following decision, a Notice of Implementation shall be issued which states the implementation date as "to be determined". • In the next Code update, as close to the decision date
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			<p>as is operationally possible, a footnote would be added to the impacted sections of the UNC text that identifies the future implementation of the modification which would amend that section.</p> <ul style="list-style-type: none"> Once a firm date for implementation of the system changes is identified, a further Notice of Implementation shall be issued confirming this as also being the date at which the legal text is implemented in the UNC. National Grid NTS will be subject to the costs of system implementation as outlined in the ROM, which are expected to be in the range of £200,000 to £250,000 to implement. Satisfied the legal text delivers the intent of the solution.
RWE	Support	<p>a) - positive d) - positive</p>	<ul style="list-style-type: none"> Later Exit Capacity Auctions within day will give gas fired electricity generators more opportunity to book capacity which better reflects actual usage during the overnight period, including when called upon to run at short notice to help balance the electricity system. Gas fired generators' cost of overruns and/or unused capacity should therefore reduce, enabling them to make more competitively priced bids in the electricity market. This would in turn reduce electricity wholesale prices which would be expected to be passed through to consumers. Agree the proposal meets the self-governance criteria and should be subject to self-governance. Believe the cost/benefit of this modification will be very positive and RWE support implementation with a minimum lead time. RWE would not face any analysis, development, or ongoing costs. Agree that the legal text will deliver the intent of the solution
Shell Energy Europe Limited (SEEL)	Support	<p>a) - positive d) - positive</p>	<ul style="list-style-type: none"> Shell Energy Europe Limited (SEEL) supports this proposal to reflect the need expressed by NTS directly connected customers for more frequent NTS Exit Capacity allocations to enable greater flexibility to react to market conditions. The ability to request the Capacity later in the Gas Day will enable Users to better match their Capacity bookings with their flows at the time when there can be a significant degree of activity.
Storengy UK Limited	Support	<p>a) - positive d) - positive</p>	<ul style="list-style-type: none"> Storengy UK Limited fully supports the implementation of this proposal and believes that this proposal will benefit all parties within the industry.

			<ul style="list-style-type: none"> • Currently the small number of capacity auctions during the day for NTS Exit Capacity limit the opportunities for Shippers to acquire capacity, and therefore limit the ability of Shippers to closely align capacity bookings to flows. More regular auctions will improve the efficiency of capacity bookings, minimising costs for gas flows and freeing up previously unused capacity that can be utilised by other Shippers . • The extension of the auction day for capacity bookings will also increase capacity booking efficiency, as well as increasing market flexibility, which is currently restricted by the inability for Shippers to book extra NTS capacity in the early hours of the morning. Extending the auction day will enable the opportunity for Shippers to adjust gas flows in the later hours of the gas day to better align to market needs, again helping in managing the gas network, and better matching gas supply to demand. • The introduction of a Capacity Allocation Period for NTS Exit Capacity will provide further benefit to Shippers as the success of bids for capacity should be confirmed soon after bids are placed, again helping in the matching of capacity bookings to gas flows. Currently the success or failure of bids made early in the gas day may not be notified to the shipper until the end of the day, meaning that Shippers are unable to confirm whether sufficient capacity has been booked until late in the auction day or after the auction day has finished. This currently presents a significant risk of overruns and financial penalties for Shippers and makes Shippers more reluctant to react to within day market changes. This solution should help to resolve this issue, encouraging market flexibility, and reducing risks of substantial increases in the costs of moving gas. • Storengy UK Limited agrees that this Modification should be self-governance as it should not have a material impact on competition or network costs, but will increase the flexibility of the industry, and improve management of NTS capacity for all parties. • The current within-day auctions limit the opportunities to acquire NTS capacity, and therefore restrict the ability of shippers to closely match capacity bookings to flows. The current uncertainty caused by the very long capacity allocation period for Within Day Exit capacity also harms Shipper's confidence in within day trading. Therefore the sooner this solution can be implemented the better, as it will enable improved efficiency (network management, market flexibility, operational time and processes, financial cost) for all parties involved.
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			<ul style="list-style-type: none"> • All elements of this proposal will enable shippers to manage capacity bookings more efficiently, and therefore more efficiently manage the costs for moving gas. This should result in improved matching of capacity bookings to flows, reduced overruns and associated costs, better utilisation of network capacity, and improved flexibility in meeting the needs of the market. • Storengy UK Limited is satisfied that the legal text will deliver the intended solution.
SSE	Support	a) - positive d) - positive	<ul style="list-style-type: none"> • Implementation of this Modification will improve access to capacity during the operational hours required and thus are likely to bring about improvements to the processes for Shippers. It will enable Shippers to book capacity which better reflects their actual usage thus it makes the processes more cost efficient. • Agrees this modification should be Self-Governance. • Implementation should be as soon as possible. • SSE is satisfied that the legal text will deliver the intended solution.

Please note that late submitted representations will not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

11 Panel Discussions

Discussion

The Panel Chair summarised that Modification 0759S would enhance the existing schedule of allocations for within-day NTS Firm Capacity products to allow Users greater access and flexibility to purchase NTS Capacity.

Panel Members considered the representations made noting that implementation was unanimously supported in the 7 representations received.

Panel Members agreed with respondents and the Proposer that this modification would improve access to capacity during the operational hours required and thus are likely to bring about improvements to the processes for Shippers. It will enable Shippers to book capacity which better reflects their actual usage thus it makes the processes more cost efficient.

Panel considered this to be a common-sense proposal which was widely supported and appeared to have no detracting views. Panel Members noted that this Modification was raised as part of Request Workgroup 0705R: NTS Capacity Access Review. <https://www.gasgovernance.co.uk/0705>

Panel Members noted the Implementation date for this Modification will be confirmed by the Transporter and will be set up to match with the required Gemini changes.

Consideration of the Relevant Objectives

Panel Members considered two Relevant Objectives: Relevant Objective a) Efficient and economic operation of the pipe-line system, and Relevant Objective 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.

Panel Members agreed that implementation of Modification 0759S would have a positive impact on both Relevant Objectives because it provides Users with a greater ability match bookings to intended flow and therefore avoid potential overrun charges or other penalties.

Determinations

Panel Members voted unanimously that Modification 0759S does not have an SCR impact.

Panel Members voted unanimously that no new issues were identified as part of consultation.

Panel Members voted unanimously to recommend implementation of Modification 0769S.

12 Recommendations

Panel Determination

Panel Members agreed:

- that Modification 0795S should be implemented.