

Transmission Workgroup – National Gas Transmission Actions

4th May 2023

1201 [01/12/22] 1.3

National Grid (PL) to provide more clarity with regards to emergency procedures and scenarios when overruns occur.

TPD Section Q4.1 clearly sets out those UNC ‘commercial processes’ that are disapplied in the event of Stage 2+ Gas Deficit Emergency*. This list of disapplied processes includes Overrun Charges, LDZ CSEP Overrun Charges and Supply Point Ratchets as set out in TPD Section B (see Q4.1.1(a)(i)).

Whilst Energy UK believes that the definitions of these mechanisms in TPD Section B should cross reference TPD Section Q4.1, we do not believe this is necessary. Our rationale here is that TPD Section Q is explicit regarding those processes dis-applied and that other UNC commercial process ‘turned off’ in an emergency as set out in TPD Section Q4.1.1 (e.g. TPD Section F3 Scheduling Charges – see TPD Q4.1.1(c)) do not include a cross reference to TPD Section Q4.1.1. therefore inclusion of such a cross reference in TPD B would be inconsistent with the relevant sections describing/defining other UNC commercial processes turned off in such cases.

** TPD Section Q4.1.3(a) defines a “Stage 2+ GDE” as a Gas Deficit Emergency at Stage 2 or higher, provided that a Stage 2+ GDE shall be taken to continue until the cessation of the relevant Gas Deficit Emergency;*

0102 [05/01/23] 1.3

National Grid (PL) to provide a cross reference between UNC Section B and Section J in relation to Overruns.

Having considered Energy UK’s views on this matter, we are happy to raise a UNC Modification Proposal to make reference in TPD Section B1.3.1 to the paragraphs that refer to the absence of Transporters obligations to accept gas/make gas available for offtake in *excess of capacity* i.e. TPD Sections

- J3.7.1: Delivery of gas to the Total System (System Entry Overruns being the commercial consequence),
- J3.8.4(b): Offtake at LDZ DM Supply Points (Supply Point Ratchets being the commercial consequence),
- J3.9.3(b): Offtake at LDZ CSEPs (LDZ CSEP Overruns being the commercial consequence); and
- J3.10.5(b): NTS Exit Points (NTS Exit (Flat) Overruns being the commercial consequence).

Hence, if the changes are implemented, in laymans terms TPD Section B1.3.1 would say “in spite of the Transporters’ obligations to not make gas available, or to accept gas, in excess of capacity, if a User *does* offtake or deliver volumes in excess of capacity then they will be subject to Overrun charges, Supply Point Ratchets etc...”.

We will commence drafting the Proposal in due course.