

The Transfer and Trade of Entry Capacity between ASEPs

Explanatory Note

Introduction

This note has been written to provide interested parties with a high level understanding of “Transfer and Trades” (referred to as T&Ts). The introduction of interim processes to facilitate T&T of NTS entry capacity introduced significant change to the way Shippers obtain entry capacity. Further changes to the entry capacity regime are envisaged and it is felt that an explanation of these changes is needed. The note has been produced by National Grid in its role as holder of the Gas Transporter Licence in respect of the NTS (“National Grid”).

National Grid is currently in the process of consulting on two documents – a Network Code modification proposal (Proposal 0187) and a methodology statement – which are required for the implementation of enduring T&T processes. Due to their nature, these two documents are written in a way that requires a good understanding of related documents and of the issues and industry debates surrounding their development. It is important that all industry players understand the changes that are being proposed. This note explains the background to T&Ts, reviews the interim arrangements and describes at a high level the current proposals.

It should be acknowledged that this is a supporting document only, and reference should be made to the modification proposal and methodology statement for specific details of the proposals. In addition, reference should be made to UNC Section B (which includes processes to obtain NTS entry capacity) and National Grid’s Gas Transporter Licence in respect of the NTS for the existing over-arching regulatory and contractual requirements.

Background

As part of the Transmission Price Control Review covering the period from April 2007 to April 2012, a number of new policy measures were introduced. Of particular relevance to this note, are the following obligations:

- Substitution;
- Transfer; and
- Trade

of baseline capacity from one entry point (ASEP) to another. These three policy measures are intended to ensure that capacity is not sterilised.

Capacity is potentially sterilised when demand for capacity is signalled in the vicinity of ASEPs where capacity is unsold or no longer wanted. The incremental demand could utilise the network capability associated with the unsold or unwanted capacity but it is sterilised if National Grid is not relieved of its continuing obligations to make the unsold or unwanted capacity available for sale. The issue of sterilised capacity has become more prominent due to the changing nature of the location of gas supplies and the declining indigenous reserves.

The purpose of these policy measures is, therefore, to maximise the availability of firm capacity at locations where demand for capacity exists. T&T is intended to apply to the constrained period (i.e. within investment lead times) as demand for additional capacity cannot be met by investment on the system within such timescales. Capacity substitution

requires National Grid to use unused baseline capacity at one entry point to support requests for incremental capacity at another entry point, thus maximizing the efficient use of the system by minimising the need for investment. Capacity substitution processes apply to long term decisions i.e. beyond investment leads times (normally 42 months) and is a permanent movement of capacity.

The obligation to introduce a T&T process became effective in September 2007, when the Licence changes to implement the Transmission Price Control Review were enacted. To comply with this obligation, National Grid developed a methodology statement for the calculation of exchange rates and worked with the industry to produce interim UNC arrangements.

Interim Transfer and Trade Arrangements

In October 2007 a process was introduced as a result of UNC Modification proposal 0169 to facilitate T&Ts for the months November 2007 to March 2008. This was a single, two-stage, stand-alone auction. The results of the auction, in terms of capacity allocated, were as follows:

| Capacity Allocated (kWh) | | | | | | |
|--------------------------|-----------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| Location Short Code | Location Name | 01-Nov-2007 to 30-Nov-2007 | 01-Dec-2007 to 31-Dec-2007 | 01-Jan-2008 to 31-Jan-2008 | 01-Feb-2008 to 29-Feb-2008 | 01-Mar-2008 to 31-Mar-2008 |
| BR | Barrow | 2,000,000 | 2,000,000 | 2,000,000 | 2,000,000 | - |
| EA | Easington | 85,386,471 | 85,829,308 | 85,829,308 | 85,829,308 | 85,829,308 |
| HT | Hatfield Moor Storage | - | - | - | - | - |
| IG | Isle of Grain | 42,338,086 | - | - | - | - |
| TE | Teesside | 23,816,852 | 48,316,852 | 42,616,852 | 41,216,852 | - |

The key point from the above allocations is that without the interim T&T process it would not have been possible to increase the obligated capacity levels at Easington and Teesside. In the case of Isle of Grain the capacity could have been obtained without the T&T processes in the monthly or daily auctions, whilst for Barrow capacity could have been obtained via a secondary trade. In terms of revenue the T&T auction generated approximately £13.5m.

Although the solution was successful in enabling capacity obligations to be transferred between entry points, significant problems were identified. The main problem being that the methodology used to calculate exchange rates acted to limit the amount of capacity that could be moved. In addition some of the capacity that was moved or purchased (in the AMSEC) with the intention to trade it to another ASEP, was not actually sterilised as there were Shippers at the original ASEP that signalled that they still wanted the capacity.

The key features of the methodology to determine exchange rates were:

- Exchange rates provided in advance
In order to provide some certainty of outcomes National Grid provided exchange rates in advance of the T&T auction. As there is no certainty prior to the auction as to where the highest bids will be there can be no certainty as to the interaction between successive T&Ts. Hence limits were applied, determined from network analysis, within which the published exchange rates could be honoured under all credible T&T scenarios. Inevitably these limits were lower than would have been

achieved for the individual T&Ts and hence limited the amount of capacity that could be moved.

- Assumed 1:1 exchange rate within zone.
It was decided that the most favourable exchange rate of 1:1 should be offered where possible. “Zones” were identified where a number of entry points that use common sections of the NTS could be assumed to have a high degree of interchangeability. However, even within zones 1:1 could only be accommodated to a limited extent. Hence a maximum aggregate capacity for all entry points within a zone was needed, below which any 1:1 exchanges could be accommodated but above which no T&Ts would take place. In the case of the Easington zone, existing aggregate capacity allocations at ASEPs within the zone exceeded the zonal limit; this immediately prevented any within zone transfers.
- Nodal allocation maxima (“NAM”),
This is the maximum capability of an individual entry point with all other factors working to increase capability, e.g. flows at adjacent entry points at their lowest. The NAM at key entry points was determined by network analysis with a default value assumed for other entry points. In no event was the capacity at an entry point permitted to exceed the published NAM.

More detail of the actual assumptions and the calculation of exchange rates is provided in Annex 1. Annex 1 is a reproduction of the document presented to the Transmission Workstream on the 30 October 2007.

All of the above features were designed to strike a balance between facilitating T&T, whilst ensuring that the physical capability of the system was not exceeded and that the T&T did not lead to a material increase in costs under credible T&T scenarios. However based on the results of the interim arrangements, it became clear that a different approach, particularly in relation to the provision of exchange rates, could lead to a more economic and efficient re-allocation of capacity.

Enduring Solution

Following the operation of the interim arrangements, National Grid, through the Joint Office, organised two workshops to consider the development of enduring arrangements. In developing the enduring arrangements, all of the issues identified above that restricted trades and transfers were addressed. Details of the actual workshops can be found on the Joint Office website.

As discussed, the enduring solution has been designed to best overcome the problems of the interim solution whilst meeting the requirements of all industry players. Hence it allows the maximum movement of capacity whilst avoiding material increases in capacity buy-back costs. The proposal is for the solution to be implemented in June 2008 in respect of capacity made available for use in July 2008.

The UNC modification proposal details how Shippers can apply for capacity and how National Grid will allocate available capacity.

The methodology statement details how an exchange rate between entry points will be calculated.

Key features of the enduring solution are;

- Uses the existing rolling monthly (RMSEC) auction with an additional “surrender” process.

- Shippers with surplus capacity can surrender it thereby making it available for purchase by other Shippers at the same, or different (a Trade), entry point. Any payment by the purchasing Shipper will be passed to the surrendering Shipper. The surrendering Shipper may set a minimum sale price, however this cannot be above the applicable reserve price of the ASEP where the capacity is being surrendered.
- Shippers bid at the ASEP where they require capacity.
- Initially surrendered and unsold capacity is allocated at the ASEP, where it has been made available. The surrendered capacity, highest surrender price first, is allocated before unsold capacity.
- Any remaining unsatisfied bids proceed to the transfer and trade process.
- Bids at each ASEP are grouped together in up to four batches.
- The weighted average price (WAP) of each batch is assessed and all groups are ranked according to the highest WAP.
- Each group is then assessed in order of ranking.
- Allocations are made for each group provided that T&Ts can be undertaken with an exchange rate of less than 10:1. Exchange rates, i.e. the decrease in obligated capacity at the donor ASEP divided by the increase in obligated capacity at the recipient ASEP, are calculated after the auction closes in accordance with the Methodology Statement.
- T&Ts are carried out on an ASEP to ASEP basis i.e. the concept of zones is not utilised.
- An exchange rate limit of 10:1 has been imposed in order to prevent excessive capacity destruction.
- Information on allocations and exchange rates utilised are published each month.

The benefits of the enduring solution are as follows:

- By using an existing auction, this reduces complexity.
- By undertaking trade and transfers on a month ahead basis, means that capacity that has not been bought at this stage is generally likely to be sterilised.
- By utilising a “surrender” process and setting a surrender price no higher than the applicable ASEP reserve price, this discourages Shippers from buying capacity with the sole intent to trade it to another ASEP. However the surrender process does facilitate the trading of unwanted capacity between ASEPs.
- By calculating exchange rates once the specific details of the trade or transfer is known better exchange rates can be calculated, in comparison with providing fixed exchange rates ahead of the auction. At the Transmission Workstream meeting on the 6 December an illustrative example, based on allocations made in the interim process, was presented to demonstrate the advantage of specific exchange rates (enduring regime) over fixed generic exchange rates (interim process).

| Bids by ASEP | Generic Exchange Rates (actual results) | Specific Exchange Rates (theoretical results) | Change (move from Generic to Specific) |
|---------------|--|---|---|
| Easington | 85.4 GWh allocated Allocations from Isle of Grain XR 2:1 approx. and from Theddlethorpe XR 19.5:1 | Approx 15 GWh could potentially have been allocated from Hatfield Moor XR approx 1:1 72 GWh could have potentially been allocated from Isle of Grain XR 2:1 approx. Approx 50 GWh could have potentially been allocated from Theddlethorpe at XR of approx 8:1. | Potential additional allocation of 51.6 GWh |
| Barrow | Bids allocated in full 1:1 Allocation from Barrow | Bids would have been allocated in full 1:1 Allocation from Barrow | Same |
| Isle of Grain | 42.3 GWh allocated 1:1 allocation from Isle of Grain | 42.3 GWh would have been allocated 1:1 allocation from Isle of Grain | Same |
| Teesside | 23.8 GWh allocated 1:1 allocated from St. Fergus. | 23.8 GWh could have potentially been allocated XR likely to be approx 1:1 from St. Fergus. | Same |

- The above practical example demonstrated that the exchange rates calculated through considering the individual trade or transfer could result in 60% more capacity being allocated at individual ASEPs than through utilising fixed exchange rates ahead of an auction. Further details of the above example are available on the Joint Office website, under the 6 December Transmission Workstream meeting.
- By determining exchange rates once the specific details of the T&T are known, the methodology underpinning the determination is much simpler as there are fewer assumptions; this also results in greater repeatability and more transparency.
- By undertaking the process on a monthly basis, information on exchange rates and allocations will also be published every month, providing shippers with an indication of likely exchange rates for the next month(s).

The potential disadvantages of the enduring solution are as follows:

- As there is an additional allocation process contained within the RMSEC auction for T&T, the RMSEC will need to be held earlier in the month. This will require Shippers to determine their capacity needs earlier. However, the interim arrangements required Shippers to determine their capacity requirements in May (AMSEC 2007) for winter 2007/08, because the T&T process was carried out between the AMSEC and relevant RMSECs.
- The process does not provide shippers with the ability to undertake bi-lateral trades between ASEPs. This functionality was not provided for in the interim arrangements and based on discussion at the Transmission Workstream a number of concerns were raised about potential undesirable consequences.
- As fixed exchange rates will not be provided ahead of the auction, Shippers will not have complete knowledge of the capacity that could be transferred or traded from

and to relevant ASEPs. However the enduring process will ensure that the maximum capacity is traded or transferred. In addition exchange rate information will be provided every month, providing shippers with regular information on likely outcomes. For the avoidance of doubt, where an allocation can be made Shippers will receive the capacity they request at the price they bid, the exchange rate only affects the amount of capacity that is transferred or traded away from the donor ASEP.

Summary

- The trade and transfer of capacity is a key policy measure in maximising the availability of firm capacity at locations where demand for capacity is above obligated levels.
- The interim arrangements successfully provided additional capacity above obligated levels at Easington and Teesside. However a number of improvements have been identified to maximise the efficient and economic re-allocation of capacity.
- These improvements, have been discussed at a number of industry meetings and based on a broad industry consensus, have been embedded into the proposals for an enduring solution.
- The required UNC Modification Proposal (Proposal 187) and Methodology Statement to implement the enduring solution are in the process of being issued for consultation. If these proposals are supported and approved an enduring T&T process will be in place for June 2008.

**Explanatory Note on Trade and
Transfer Information**

in respect of the

**Transfer and Trade System Entry Capacity
Auction - September 2007**

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Background

- 1 On 25 September 2007, National Grid NTS published the Transfer and Trade System Entry Capacity (TTSEC) Auction invitation. This invitation contained the following key information:
 - Merit order of **ASEP**¹s for relevant and related **zones**
 - Nodal allocation maximums for recipient ASEPs
 - Zonal allocation maximums for zones that contained a recipient ASEP
 - Inter zone exchange rates between the zones sharing a beneficial relationship with those zones containing a recipient ASEP.

Other information provided in the auction invitation was produced in accordance with UNC Modification 169² and is not expanded upon in this guide.

- 2 All of the above data was calculated in accordance with the approved Transfer and Trade Methodology Statement (the "Methodology Statement"). A link to the statement is provided below.

<http://www.nationalgrid.com/uk/Gas/Charges/statements/>

- 3 The Methodology Statement was required to identify applicable exchange rates for the movement of capacity between ASEPs without creating a material increase in costs. This explanatory note is intended as a guide to how the Methodology Statement was applied, providing additional detail to all stakeholders.
- 4 It should be acknowledged that the methodology was developed in good faith to meet the requirements of the industry whilst satisfying **Licence** obligations. Although alternative methodologies may have been considered National Grid NTS believes that the methodology proposed, and approved by the Authority, represents the best solution obtainable within the time available.
- 5 The setting of baselines at levels above that which can be simultaneously satisfied means that 1:1 exchange rates are not always possible.

Merit Order

- 6 The Merit Order is used to rank ASEPs in a zone according to where a reduction in obligated capacity is most likely to lead to a reduction in actual flow. The calculation is performed at each ASEP by dividing "expected daily ASEP flow" for the month in question by the obligated capacity level of the ASEP. ASEPs are ranked in descending order.
- 7 In determining the "expected daily ASEP flow", National Grid NTS took account of the **TBE** 2006 and winter 2006/07 historical flow data at the expected demand levels for

1 Key terms, if not defined within the main body of this note are highlighted in bold and described in the glossary.

2 Uniform Network Code modification proposal 169 "Transfer and Trading of Capacity between ASEPs" accessed at the following link:
<http://www.gasgovernance.com/Code/Modifications/ClosedMods/CM161-170/>

the months in question. This led to a consistent merit order for all months within the auction period, see table below.

| Zone | ASEP | Merit Order |
|-------------------|------------------------|-------------|
| Easington | Easington | 1 |
| | Hatfield Moor Storage | 2 |
| | Hatfield Moor On-shore | 3 |
| | Hornsea | 4 |
| | Garton | 5 |
| South East | Isle of Grain | 1 |
| | Bacton | 2 |
| Northern Triangle | Teesside | 1 |
| | St.Fergus | 2 |
| | Barrow | 3 |
| | Glenmavis LNG | 4 |
| Theddlethorpe | Theddlethorpe | 1 |

Nodal Allocation Maximum (NAM)

- 8 The published NAM for each recipient ASEP, except the Teesside ASEP, is based on the Nodal Capability data published by National Grid NTS on 6 July 2007. The data was derived via the process detailed in paragraph 20 of the Transfer and Trade Methodology Statement. The information is available on the Joint Office website via the link below.

<http://www.gasgovernance.com/Code/Workstreams/TransmissionWorkstream/2007Meetings/>

- 9 The NAM for the Teesside ASEP is based on the highest flows achieved over the past 5 years, rather than the value published on 6 July 2007 by National Grid NTS, due to physical and safety limitations at Teesside (paragraph 20b of the Methodology Statement).
- 10 The table below details the NAMs published in the auction invitation. The NAMs are constant for every month, except for the Easington ASEP for the month of November. The reason for the lack of monthly variation for all other ASEPs is that the NAM is capped at 150% of the obligated capacity, whereas for the Easington ASEP the NAM varies with demand. November has a lower demand level than all of the other months considered and therefore a slightly lower NAM is applicable.

| Zone | Recipient ASEP | Proposed Nodal Allocation maximum (NAM) (kWh/Day) | | | | |
|-------------------|-----------------------|---|---------------|---------------|---------------|---------------|
| | | Nov-07 | Dec-07 | Jan-08 | Feb-08 | Mar-08 |
| Easington | Easington | 1,256,666,667 | 1,267,500,000 | 1,267,500,000 | 1,267,500,000 | 1,267,500,000 |
| Easington | Hornsea | 247,000,000 | 247,000,000 | 247,000,000 | 247,000,000 | 247,000,000 |
| Easington | Hatfield Moor Onshore | 450,000 | 450,000 | 450,000 | 450,000 | 450,000 |
| Easington | Hatfield Moor Storage | 22,350,000 | 22,350,000 | 22,350,000 | 22,350,000 | 22,350,000 |
| Northern Triangle | Teesside | 476,666,667 | 476,666,667 | 476,666,667 | 476,666,667 | 476,666,667 |

Zonal Allocation Maximum (ZAM)

- 11 The ZAM is used for the within zone process. It determines the maximum capacity level (i.e. the aggregate capacity for all ASEPs within the zone) up to which trades and transfers can be undertaken, to and from any ASEP within the zone, on a 1:1 basis without leading to a material increase in costs.
- 12 Based on the UNC Modification 0169, there were two zones that required a ZAM to be calculated, the Northern Triangle and the Easington zone. The description below describes the key assumptions and analysis for the determination of these two ZAMs.
- 13 In determining a ZAM for the months in question, the applicable minimum and maximum demands were considered. Within this range two particular demand levels were identified which would be applicable to all months. The demand levels were 350 mcm/d and 400 mcm/d. The reason for selecting these demand levels was that they represent a cold and a typical winter day, therefore they provide a good basis to undertake the risk assessment.
- 14 At each of the selected demand levels a supply scenario, “test scenario”, was developed based on last year’s historical flow data. The test scenarios considered flows from East Coast terminals at levels that would be anticipated to occur on a coincidental basis for a number of days this coming winter. From experience higher East Coast flows represent a “difficult” supply pattern for the majority of ASEPs where there was an interest in increasing capacity. Only two test scenarios were feasible in the time available.
- 15 Based on each of the test scenarios, the process as described in paragraph 31 of the Methodology Statement was followed. In summary this involved:
 - a. increasing the flow at the ASEP being analysed to its NAM
 - b. reducing the ability of other ASEPs within the zone to flow gas by an amount equal to the above flow increase, starting from their obligated capacity level, with these ASEPs being selected one by one in reverse merit order, i.e. starting with those less likely to see an actual reduction in flows
 - c. if step b does not fully rebalance the network, further supply rebalancing was undertaken at an out of zone ASEP
 - d. based on the new supply scenario, test whether the network fails
 - e. if the network does fail, further reductions to the within zone flow levels are made and steps c & d are repeated
 - f. if the network still fails the flow increase at the analysed ASEP is incrementally reduced and steps c & d repeated until no failure occurs. This revised ASEP level is termed the WZNAM in the Methodology Statement.
 - g. where appropriate the process may be repeated for other recipient ASEPs in the zone.
- 16 In undertaking the above analysis using a limited number of test scenarios based on historical flow patterns, National Grid NTS has taken the view that if the network fails under any of the points tested, this would lead to a material increase in costs, as a constraint would occur and hence buy back action would need to be taken. Hence,

after completion of the analysis for the two test scenarios the lowest resultant value was taken.

- 17 With regard to the ZAM for the Northern Triangle, there was only one valid recipient ASEP, the Teesside ASEP, for the months November through to February. Therefore analysis was only undertaken for Teesside ASEP. Under the test scenarios considered, it was possible to increase the flow at the Teesside ASEP up to the NAM of 476 GWh/day without causing a system failure. This was achieved by reducing the flow levels within the Northern Triangle zone by an equal amount (in reverse merit order) and rebalancing the network. Therefore the ZAM for the Northern Triangle, before any cross zone check, was the sum of obligated capacity levels i.e. 2362 GWh/day.
- 18 With regard to the ZAM for the Easington zone, there were four valid recipients, with the Easington and Hatfield Moor Storage ASEPs being valid recipients for all the months in question. As Easington ASEP was by far the largest ASEP, according to obligated capacity, and is located at a constrained point within the zone, the analysis to determine the ZAM was based on the Easington ASEP analysis. To explain how the final ZAM of 1105 GWh/day was reached a step by step approach is described below according to the same steps described in paragraph 15 above:
 - a. For November, the flow at the Easington ASEP was increased to 1257 GWh/day, representing a 195 GWh/day flow increase
 - b. The maximum permitted flow level at Garton ASEP was reduced by an equal amount i.e.195 GWh/day. Garton ASEP is last in the merit order. However the difference between **maximum permitted flow level** and the assumed flow level on the network was such that this reduction did not impact flows under the test scenario, and so rebalancing was required
 - c. The network was brought back into balance by reducing flows at the St. Fergus ASEP by 195 GWh/day. St. Fergus ASEP was chosen because this would have least impact on the Easington Zone
 - d. The network failed under this test scenario
 - e. Further reductions were made to the maximum permitted flow levels within the Easington zone (but not at Easington ASEP), which resulted in flows within the zone being affected and therefore less rebalancing being required at the St. Fergus ASEP. However under all of these conditions the network still failed. At the end of this step all maximum permitted flow levels at ASEPs within the Easington zone (excluding Easington ASEP) had been reduced to zero
 - f. The flow was incrementally reduced at the Easington ASEP requiring less rebalancing at St Fergus ASEP. The point at which the network did not fail was with the Easington ASEP flowing at 1105 GWh/day. As all other maximum permitted flow levels had been reduced to zero, the ZAM for the Easington zone equated to the final Easington ASEP flow level of 1105 GWh/day and the WZNAM for Easington ASEP was also set at 1105 GWh/day
- 19 According to UNC Modification 0169, a within zone allocation process only takes place if the sold level of capacity within the zone minus any capacity surrendered is less than the ZAM. For the Easington zone the sold level minus the capacity surrendered for all months in question was greater than 1105 GWh/day. Therefore as no within zone process would be undertaken for the Easington zone, there was no need to do a cross zone check of the ZAM.

Inter Zone Exchange Rates

- 20 Inter zone exchange rates are determined for the movement of capacity across entry zones, where there is a beneficial relationship between zones i.e. a reduction in flows within one zone would allow more gas to flow out of another zone.
- 21 As stated above the Northern Triangle zone and Easington zone were the only two zones where there were recipient ASEPs. According to UNC Modification 0169 this required exchange rates to only be calculated for these two recipient zones.
- 22 In determining the inter zone exchange rates, the test scenarios developed for the calculation of the ZAMs were used. As stated in paragraph 20, exchange rates would only be calculated where there is a beneficial relationship. For the Northern Triangle and the Easington zones, the zones that could potentially have a beneficial relationship were:
- a. Northern Triangle zone
 - b. Easington zone
 - c. South East zone
 - d. Theddlethorpe zone
- 23 In order to identify whether an inter zone exchange rate would be applicable the flow levels assumed in the test scenarios were compared against the sold capacity levels minus any surrendered capacity. If the flow levels were above the sold capacity levels minus any surrendered capacity an exchange rate would be applicable. The only ASEPs where these conditions existed were the Isle of Grain ASEP (November through to March) and Theddlethorpe ASEP (November only). Therefore inter zone exchange rates were calculated for both the Northern Triangle and the Easington zones from the South East and Theddlethorpe zones for the respective months.
- 24 The exchange rates, based on each of the test scenarios, were determined through the following method:
- a. increase flow at the recipient ASEP, highest in the merit order, within the recipient zone by an amount equal to a selected increment of capacity
 - b. reduce the ability of ASEPs within the donor zone, by an amount equal to the increment, to flow gas. ASEPs being selected in merit order
 - c. if the step c does not fully rebalance the network, rebalance at St. Fergus ASEP
 - d. based on the new supply scenario, test whether the network fails
 - e. if the network does fail, gradually reduce the flow increase at the recipient ASEP and repeat steps d & e
 - f. if the network does not fail, the exchange rate is calculated by dividing the increment moved from the donor ASEP by the final flow increase at the recipient ASEP
- 25 As an example of how the process worked, considering the exchange rate between the South East zone and Easington zone:
- a. the flow at Easington ASEP was increased by 173 GWh/day
 - b. the maximum permitted flow level at Isle of Grain ASEP was reduced by an equal amount i.e.173 GWh/day. Isle of Grain ASEP is first in the merit order. This resulted in a significant reduction in flows at the Isle of Grain

ASEP under the test scenario, but not enough to maintain a system balance

- c. the network was brought back into balance by reducing flows at St. Fergus ASEP by a small amount
- d. the network failed under this test scenario
- e. the flow increase at the Easington ASEP was gradually reduced with commensurate increases at St. Fergus ASEP. The point at which the network did not fail was when the flow increase at the Easington ASEP was 85.8 GWh/day
- f. the exchange rate was therefore calculated as 2:1
- g. further analysis at incremental levels below 173 GWh/day was undertaken to determine the impact if only some of the available capacity was to be traded or transferred. This identified differing exchange rates for different capacity bands. The overall exchange rate remained at 2:1

26 In setting the final inter zone exchange rates, it was also necessary to consider the implications of only some of the capacity being transferred and the remainder being retained and flowed against at the donor ASEP. This check was performed for all inter zone exchange rates; however this only impacted upon the exchange rates from Theddlethorpe zone to the Northern Triangle and Easington zones. In these cases the exchange rate was reduced to ensure that a partial allocation would not result in a material increase in risk.

27 The table below details the inter zone exchange rates published in the auction invitation.

For Nov 2007 – Mar 2008

| Donor Zone | Recipient Zone | Available Capacity Banding for Allocation in Donor Zone (kWh/Day) | Exchange Rate |
|------------|-------------------|---|---------------|
| South East | Easington | Between 0 & 86,666,667 | 2.3:1 |
| | | Between 86,666,667 & 173,333,333 | 1.8:1 |
| | | > 173,333,333 | 0 |
| South East | Northern Triangle | Between 0 & 86,666,667 | 2:1 |
| | | Between 86,666,667 & 173,333,333 | 1:1 |
| | | > 173,333,333 | 0 |

For Nov 2007 only

| Donor Zone | Recipient Zone | Available Capacity Banding for Allocation in Donor Zone (kWh/Day) | Exchange Rate |
|---------------|-------------------|---|---------------|
| Theddlethorpe | Easington | 419,359,603 | 19.5:1 |
| Theddlethorpe | Northern Triangle | 419,359,603 | 7.8:1 |

Summary

28 This explanatory note has detailed how each of the key pieces of information contained within the TTSEC auction invitation published on the 25 September 2007 was determined.

29 All information was produced in accordance with both the Methodology Statement and UNC Modification 0169.

Glossary

ASEP – Aggregate System Entry Point is a point on the system that comprises one or more entry points, e.g. Bacton ASEP consists of several individual system entry points. This represents the level at which system capacity is sold. A precise definition is provided in Uniform Network Code TPD Section A.2

Licence – National Grid Gas plc’s Gas Transporter Licence in respect of the NTS.

Maximum Permitted Flow Level - For the purposes of the analysis the MPFL set a limit on the amount that specific ASEPs within a zone can flow i.e. if the MPFL is 20 units the flow at the ASEP for further analysis was constrained to a maximum of 20 units.

Obligated Capacity - The obligated entry capacity level is the level of capacity that National Grid NTS is obliged to make available. It incorporates the initial baseline Entry Capacity plus incremental capacity that has subsequently been released. A more precise definition is provided in paragraph 58 of National Grid NTS’ Incremental Entry Capacity Release Methodology Statement. A link to the statement is provided below

<http://www.nationalgrid.com/uk/Gas/Charges/statements/transportation/iecr/>

TBE - The Transporting Britain's Energy consultation initiates National Grid NTS’ annual planning process as set out in the Gas Transportation Ten Year Statement. Questionnaires are designed to gather data relating to influences upon, and current forecasts of, the gas supply and demand placed upon the network and assist in the process of evaluating network capacity requirements.

Zones - Where ASEPs utilise sections of common NTS infrastructure and consequently are deemed to be ‘interactive’ in terms of utilising network capability National Grid NTS grouped the ASEPs into zones.

The ASEPs that constituted each Entry Zone are provided below.

| Zone | ASEP |
|---------------------|---|
| Easington Zone | Easington terminals (inc Rough) Hornsea Garton / Aldborough Hatfield Moor |
| Theddlethorpe Zone | Theddlethorpe |
| South East Zone | Bacton terminals (inc. Continental Interconnector) Grain LNG |
| Northern Triangle | Barrow terminals Teesside terminals St Fergus terminals Glenmavis |
| North West Corridor | Fleetwood Partington Burton Point |

| | |
|--------------------|--|
| | Hole House Farm Byley / Cheshire |
| West UK Zone | Milford Haven Dynevor Arms |
| South West UK Zone | Humbley Grove Wytch Farm Avonmouth |