

**CODE MODIFICATION PROPOSAL No 0219**  
**Publication of GB Wholesale Gas Market Liquidity Data**  
**Version 5.0**

**Date:** 31/10/2009

**Proposed Implementation Date:** 31/03/2009

**Urgency:** Non Urgent

## **1 The Modification Proposal**

### **a) Nature and Purpose of this Proposal**

Gas trades by shippers at the NBP are currently notified to National Grid NTS either on, or ahead of, the relevant Gas Day. National Grid NTS already records and publishes the level of physical flows into the NTS (total daily input nominations). The purpose of this Modification Proposal is to consolidate and present mostly existing data (some of which is currently presented in separate and difficult-to-compare reports on NG NTS' website) in an easily accessible and meaningful manner. In doing so, this proposal aims to provide a single location for information pertaining to the liquidity of the GB wholesale gas market.

With rising commodity prices and misinformation from some quarters about the level of liquidity of the GB wholesale gas market, we believe there is a pressing need to publish this data in order to clearly demonstrate the competitiveness of the GB wholesale traded gas market. This proposal, if implemented, will be of particular interest to consumers, trade associations and potential new entrants to the market. It could also provide benefit to shippers/suppliers who may not currently have the capability to model or monitor market liquidity.

Publication of liquidity data would also provide a "health check" for the market and may help industry participants (including customers) to better understand movements in the wholesale price of gas. It should be noted that the aim of the proposal is *not* to make available commercially confidential information or to place any additional requirements on Users to provide data that is not already being provided.

### **The Proposal:**

It is proposed to amend UNC TPD Section V, Annex V-1 ("Operational and Market Data"), such that National Grid NTS is required to publish and present aggregated data comprising for each Gas Day:

- (i) The daily **volume** (in TWh) of all total matched trades in respect of that Day (before the Day & within Day); and
- (ii) The **volume** (in TWh) of all total daily input nominations in respect of that Day; and
- (iii) The total **number** of matched trades to which the volume of all 'total matched trades' applies; and
- (iv) The total **number** of Users who have registered a Trade Nomination for the

relevant Gas Day.

All of the above data will be published daily by National Grid NTS on D+2, by 13:00 hours. For clarity, where superior data is received by National Grid, the daily data presented on D+2 will not be updated retrospectively.

### **Additional Information**

If this Modification Proposal is implemented, it is anticipated that parties may wish to promote a change to the Network Code Operations Reporting Manual (NCORM) in order to incorporate, within the established data dictionary approach, the additional data which it is proposed should be released. Any such NCORM change requires approval by a Panel majority of the UNC Committee. Additionally, under UNC TPD Section V 9.4.5 (a) “*National Grid NTS will notify Users of its proposal not less than one month before implementing such proposal*”.

Although it does not form part of this Modification Proposal, for information purposes, it is anticipated that the data detailed in this Proposal would be presented in the following formats:

- (1) **Headline figures** to be displayed in tabular format on National Grid’s website, in the ‘Prevailing View’ section. An illustrative example is included below:

<b>Day</b>	<b>Time</b>	<b>Total Daily Matched Trades (TWh)</b>	<b>Total Daily Input Nominations (TWh)</b>	<b>Total Number of Matched Trades</b>	<b>Total number of Users who have registered a Trade Nomination for the relevant Gas Day</b>
07/04/2009	13:00	x	x	x	x

- (2) **Graphical report & raw underlying data.** Two year’s worth of historical data to be presented on the National Grid website (e.g. “Operational Data”>”Report Explorer”>”Daily Summary Report”) in both graphical and raw underlying data formats. For clarity, this should include for each Gas Day:

- (i) The daily **volume** (in TWh) of all total matched trades (before the day & within day); and
- (ii) The **volume** (in TWh) of all total daily input nominations; and
- (iii) The total **number** of matched trades to which the volume of all ‘total matched trades’ applies; and
- (iv) The total **number** of Users who have registered a Trade Nomination for the relevant Gas Day.

- b) **Justification for Urgency and recommendation on the procedure and timetable to be followed (if applicable)**

It is requested that this Modification Proposal should proceed on a non-

urgent basis.

- c) **Recommendation on whether this Proposal should proceed to the review procedures, the Development Phase, the Consultation Phase or be referred to a Workstream for discussion.**

The proposer intends to present this proposal for discussion and development to at least one Transmission Workstream for before formally requesting that it proceeds to consultation.

## 2 **Extent to which implementation of this Modification Proposal would better facilitate the achievement (for the purposes of each Transporter's Licence) of the Relevant Objectives**

*Standard Special Condition A11.1: (c) so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence*

Implementation may assist National Grid NTS with its wider obligations to develop and maintain an efficient and economic system, by providing to the market, information where there is a genuine need for such information to be provided and it would be proportionate to do so.

*Standard Special Condition A11.1: (d) so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition: (i) between relevant shippers*

Implementation may aid new entrants who, via the information proposed, may be better able to gauge the level of liquidity of the market and thereby take a more informed view of the risks and rewards of entering the market. This may ultimately attract more new entrants resulting in increased competition between gas shippers.

Implementation may also benefit existing Users by providing a level playing field regarding access to market liquidity data, thereby better facilitating this particular objective.

*Standard Special Condition A11.1: (f) of efficiency in the implementation and administration of the network code and/or the uniform network code*

Implementation would provide a direct means of monitoring liquidity in the GB wholesale gas market and via this "health check" approach may help highlight either merits or deficiencies in the current UNC rules (e.g. if liquidity increases or decreases following the implementation of a UNC Modification Proposal).

## 3 **The implications of implementing this Modification Proposal on security of supply, operation of the Total System and industry fragmentation**

It is not believed that this Proposal will have any adverse effect on security of supply. Moreover, accessible liquidity data may actually increase security of supply

as it gives all participants a measure of the health of the market.

**4 The implications for Transporters and each Transporter of implementing this Modification Proposal, including:**

**a) The implications for operation of the System:**

None anticipated.

**b) The development and capital cost and operating cost implications:**

There are likely to be some costs associated with collating, consolidating and publishing the new data on National Grid's website. However, as National Grid NTS already collects and collates this data the only cost would be associated with presenting it in the formats described above, on a daily basis. National Grid NTS is committed to present a Rough Order of Magnitude estimate of the associated costs within the consultation period.

**c) Whether it is appropriate to recover all or any of the costs and, if so, a proposal for the most appropriate way for these costs to be recovered:**

It is for the Transporter to determine the costs of implementation; however, it is believed that this change could be accommodated by National Grid NTS within their existing budget for system changes.

**d) The consequence (if any) on the level of contractual risk of each Transporter under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal**

None identified.

**5 The extent to which the implementation is required to enable each Transporter to facilitate compliance with a safety notice from the Health and Safety Executive pursuant to Standard Condition A11 (14) (Transporters Only)**

Not applicable.

**6 The development implications and other implications for the UK Link System of the Transporter, related computer systems of each Transporter and related computer systems of Users**

There are clearly some implications with regard to developing and implementing changes to National Grid's website. The Proposer understands that National Grid NTS is evaluating whether changes will be required to UK Link.

**7 The implications for Users of implementing the Modification Proposal, including:**

**a) The administrative and operational implications (including impact upon manual processes and procedures)**

Implementation may benefit Users by providing a level playing field regarding access to market liquidity data.

**b) The development and capital cost and operating cost implications**

Implementation may benefit Users by providing a level playing field regarding access to market liquidity data.

**c) The consequence (if any) on the level of contractual risk of Users under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal**

Implementation may aid Users who, via the information proposed, may be better able to gauge the level of liquidity of the market and thereby take a more informed view of the risks and rewards.

**8 The implications of the implementation for other relevant persons (including, but without limitation, Users, Connected System Operators, Consumers, Terminal Operators, Storage Operators, Suppliers and producers and, to the extent not so otherwise addressed, any Non-Code Party)**

Implementation could provide potential benefits for all market participants; but in particular provide customers/consumers with easier access (than currently) to GB wholesale gas market liquidity data.

**9 Consequences on the legislative and regulatory obligations and contractual relationships of the Transporters**

The proposed obligation on the Transporter will be to publish the prescribed data items on a daily basis.

**10 Analysis of any advantages or disadvantages of implementation of the Modification Proposal not otherwise identified in paragraphs 2 to 9 above**

**Advantages:**

- Improves visibility of the liquidity of the GB wholesale gas market without revealing commercially confidential information.
- Provides a “health check” on the GB wholesale gas market.
- Consolidates disparate data and presents in an easily accessible format, which is particularly important for customers or potential new entrants.

**Disadvantages:**

- Some costs would be incurred to implement this Proposal

**11 Summary of representations received as a result of consultation by the Proposer (to the extent that the import of those representations are not reflected elsewhere in this Proposal)**

None received.

**12 Detail of all other representations received and considered by the Proposer**

None received.

**13 Any other matter the Proposer considers needs to be addressed**

Not applicable.

**14 Recommendations on the time scale for the implementation of the whole or any part of this Modification Proposal**

To be implemented in whole by 31/01/2009.

**15 Comments on Suggested Text**

To be inserted at UNC TPD Section V, Annex V-1.

**16 Suggested Text**

<b>Data</b>	<b>Timing</b>	<b>Format</b>	<b>Presentation</b>	<b>Disclosure</b>
<p>The daily volume (in TWh) of all total matched trades (before the Day &amp; within Day); and</p> <p>The volume (in TWh) of all total daily input nominations; and</p> <p>The total number of matched trades to which the volume of all ‘total matched trades’ applies; and</p> <p>The total number of Users who have registered a Trade Nomination for the relevant Gas Day.</p>	<p>By 13:00 hours on each Day on D+2.</p>	<p>Graphical and Tabular</p>	<p>Viewable and Downloadable.</p>	<p>Public</p>

**Code Concerned, sections and paragraphs**

Uniform Network Code

Transportation Principal Document Individual Network Code - National Grid

**Section(s)** V, Annex V-1

**Proposer's Representative**

*Name (Organisation)*

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**Proposer**

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