

0288: Facilitating the Reduction of Enduring Annual NTS Exit (Flat) Capacity by a value less than 100,000kWh

**CODE MODIFICATION PROPOSAL No 0288**

**<Facilitating the Reduction of Enduring Annual NTS Exit (Flat) Capacity by a value less than 100,000 kWh>  
Version 2.0**

**Date:** 24/03/2010

**Proposed Implementation Date:**

**Urgency:** Non Urgent

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**1 The Modification Proposal**

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

*Where capitalised words and phrases are used within this Modification Proposal, those words and phrases shall usually have the meaning given within the Uniform Network Code (unless they are otherwise defined in this Modification Proposal). Key UNC defined terms used in this Modification Proposal are highlighted by an asterisk (\*) when first used. This Modification Proposal\*, as with all Modification Proposals, should be read in conjunction with the prevailing UNC.*

**Background**

Implementation of Modification Proposal\* 0195AV established the basis for the reform of NTS Exit Capacity\* booking arrangements that, in full, are scheduled to come into effect on 1 October 2012.

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National Grid NTS\* calculated, for each User\* at each NTS Exit Point\*, an initialised value of Enduring Annual NTS Exit (Flat) Capacity\* the Users initialised value was calculated in accordance with UNC TDIIC Section 8.2. National Grid NTS then notified each User of their allocation of initialised Enduring Annual NTS Exit (Flat) Capacity at each NTS Exit Point prior to/by the 1st May 2009. This may, for certain Users at certain NTS Exit Points, have resulted in a User/s being allocated less than 100,000kWh of Enduring Annual NTS Exit (Flat) Capacity.

In accordance with the Exit Capacity Release Methodology Statement a four year user commitment is applied to requests for increases in Enduring Annual NTS Exit (Flat) Capacity however this user commitment is not applied to initialised Enduring Annual NTS Exit (Flat) Capacity bookings. Users were able to reduce their initialised values in the July 2009 reduction window (1<sup>st</sup> to 15<sup>th</sup> July) and can continue to do so at subsequent reduction windows (subject to lead times and the Exit Capacity Release Methodology Statement) until July 2011. However any request for a Reduction Amount\* must be for an amount that is equal to or greater than the Minimum Eligible Amount\* (100,000kWh per day) as such the UNC currently does not allow a User to request a Reduction Amount that is less than 100,000 kWh per day (UNC B3.1.4).

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**Proposal**

National Grid NTS proposes to remove the Minimum Eligible Amount requirement for all Capacity reduction requests. This will enable any User with an Enduring Annual NTS Exit (Flat) Capacity quantity that is less than 100,000 kWh at an NTS Exit Point, to reduce their Enduring Annual NTS Exit (Flat) Capacity quantity, at that NTS Exit Point, in the reduction window, or via an ad-hoc reduction request. This Proposal will also enable any User with an Enduring Annual NTS Exit (Flat) Capacity quantity that is greater than 100,000 kWh, at an NTS Exit Point, to request a Reduction Amount\* of less than 100,000kWh, at that NTS Exit Point.

This Proposal does not propose to amend the Minimum Eligible Amount for NTS Exit (Flat) Capacity applications or for any NTS Entry Capacity mechanisms or to allow a User to apply for, bid for or offer to surrender NTS Exit Capacity of less than 100,000 kWh outside of the Capacity reduction window or ad-hoc reduction request, therefore this proposal will only apply to Enduring Annual NTS Exit (Flat) Capacity reduction requests.

For the avoidance of doubt National Grid NTS does not intend to make any changes to the User commitment rules detailed in the Exit Capacity Release Methodology Statement which will continue to apply to any and all Enduring Annual NTS Exit (Flat) Capacity reduction requests.

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

Urgent procedures are not requested

**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.**

National Grid NTS has discussed this issue at the February and March Transmission Workstreams and submitted this Modification Proposal to the March Panel. The Mod Panel has referred this Proposal back to the April Transmission Workstream for further discussion. It is now proposed that this proposal proceed to the Consultation Phase after the April Modification Panel.

**2 User Pays**

**a) Classification of the Proposal as User Pays or not and justification for classification**

The User Pays Service\* that is being proposed in this Modification Proposal is to allow Users to request a Reduction Amount of Enduring Annual NTS Exit (Flat) Capacity that accurately reflects their requirements. It is the view of National Grid NTS that this Proposal is a change/addition to the services provided by xoserve and as such National Grid NTS is of the view that this is a User Pays Proposal.

National Grid NTS believes that this change will provide a clear benefit for all Users and National Grid NTS

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Grid NTS. There are discernable benefits for those Users that have been initialised with values less than 100,000kWh who wish to reduce their Registered NTS Exit (Flat) Capacity holding to zero for those Users who at a future date may also find themselves with a Registered NTS Exit (Flat) Capacity holding that is less than 100,000kWh who again wish to reduce to zero. As a result of Users being able to reduce to zero this would enable National Grid NTS to make available and potentially allocate such NTS Exit (Flat) Capacity.

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**b) Identification of Users, proposed split of the recovery between Gas Transporters and Users for User Pays costs and justification**

National Grid NTS is of the view (due to the reasons outlined above) that this is a User Pays Proposal, xoserve have confirmed that the facility for National Grid NTS to enable Users to reduce their Enduring Annual NTS Exit (Flat) Capacity where their holding is less than 100,000 kWh may be catered for under the current Exit Reform system development and as such may be done at zero cost.

National Grid NTS proposes due to the reasons outlined above, that the split of the recovery of Implementation Costs should be:

50% Shipper Users\* 50% Transporters

National Grid NTS proposes that the Shipper User element of the Implementation costs be recovered via a one off implementation charge that is met by those Shipper Users who have NTS Exit (Flat) Capacity holdings and would therefore benefit from this Proposal.

The Shipper User costs would be pro rated between Shipper Users based on their NTS Exit (Flat) Capacity holdings as a proportion of the total NTS Exit (Flat) Capacity holdings held by all Shipper Users as of the 1st October 2012 as registered by National Grid NTS on the implementation date of this Modification Proposal These charges will be one off charges invoiced in the month following the introduction of the systems and processes that enable this change, in effect:

$$\frac{\text{Shipper User NTS Exit (Flat) Capacity holdings}}{\sum \text{all Shipper Users NTS Exit (Flat) Capacity holdings}} * \text{Shipper proportion of Implementation Costs}$$

**c) Proposed charge(s) for application of Users Pays charges to Shippers**

Any final individually invoiced amount will be subject to an assessment of the NTS Exit (Flat) Capacity held by Shipper Users for the 1 October 2012 on implementation of this Modification Proposal and the final system implementation costs. Utilising the current levels of NTS Exit (Flat) Capacity held by Shipper Users (for the 1 October 2012) and the ROM Cost estimate provided by xoserve, gives the following cost:

Cost per unit of capacity held 0.0000p/kWh

**d) Proposed charge for inclusion in ACS – to be completed upon receipt of cost estimate from xoserve**

Any charge applied will be based on the formula outlined in Section 2 b) above and will be dependent upon actual costs received from xoserve

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**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 (a): the efficient and economic operation of the pipe-line system to which this licence relates;* ; For the reasons given below, the Proposer believes that this Proposal will better facilitate relevant objectives A11.1 (a)

- Users with an initialised Enduring Annual NTS Exit (Flat) Capacity value less than 100,000 kWh are currently unable to accurately reflect their Enduring Annual NTS Exit (Flat) Capacity requirements by reducing their initialised Enduring Annual NTS Exit (Flat) Capacity value to zero. As it currently stands such initialised capacity is in effect sterilised and is not available to the market. Implementation of this Proposal will enable Users to reduce their Enduring Annual NTS Exit (Flat) Capacity and as a result enable National Grid NTS to make available any such sterilised NTS Exit (Flat) Capacity to other Users at an NTS Exit Point, as the level of unsold NTS Exit (Flat) Capacity made available in the NTS Exit (Flat) Capacity mechanisms will increase.

*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; (ii) between relevant suppliers;* For the reasons given below, the Proposer believes that this Proposal will better facilitate relevant objectives A11.1 (d)

- Under the current UNC rules those Shippers that are initialised with an Enduring Annual NTS Exit (Flat) Capacity value less than 100,000kWh cannot reduce this value to zero via the existing NTS Exit (Flat) Capacity reduction processes whereas those Users that are initialised with values greater than 100,000kWh can. Amending this ensures that all requests for a reduction in Initialised NTS Exit (Flat) Capacity will be treated in the same manner irrespective of the size of the initialised value.

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

No implications on security of supply, operation of the Total System or industry fragmentation have been identified.

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

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

None Identified

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

National Grid NTS does not believe that this Proposal, if implemented will have any cost implications with regards to system implementation and

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operating costs.

- 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:**

Not Applicable

- 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**

It is not envisaged that the Proposal will result in any change to the level of contractual risk to National Grid NTS.

- 6 **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

- 7 **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**

National Grid NTS will need to undertake development of the UK-Link system to accommodate this Proposal. National Grid NTS raised a ROM (Rough Order of Magnitude) request with xoserve to ascertain the indicative costs, xoserve's response has indicated that the change can be done at zero cost.

Please note the following:

- That the costs utilised are Rough Order of Magnitude Costs and may be subject to change
- That the NTS Exit (Flat) Capacity figure used reflects the level of NTS Exit (Flat) Capacity that Shipper Users currently hold and may be subject to change.

As such any charge will be indicative only

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

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

The administrative burden on Users may be reduced as those Users that have either been initialised with or at some point find themselves holding less than 100,000kWh per day will be able to reduce their quantity of Enduring Annual NTS Exit (Flat) Capacity to zero.

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

National Grid NTS believes there is no development, capital or operation cost implications.

**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**

No consequences on the level of contractual risk have been identified.

**9 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)**

None identified

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

None identified

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

**Advantages**

As above

**Disadvantages**

None identified

**12 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)**

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

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

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

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16 Comments on Suggested Text

17 Suggested Text

Code Concerned, sections and paragraphs

Uniform Network Code

Transportation Principal Document

Section(s) B

Proposer's Representative

Fergus Healy, National Grid NTS

Proposer

National Grid NTS

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