

## Stage 01: Modification

At what stage is this document in the process?

# 0458:

## Seasonal LDZ System Capacity Rights.

- 01 Modification
- 02 Workgroup Report
- 03 Draft Modification Report
- 04 Final Modification Report

The application of Seasonal LDZ System charges in line with seasonal LDZ System Capacity rights for Large Supply Points.



The Proposer recommends that this modification should be

- assessed by a workgroup



High Impact:  
Distribution Networks, Shippers, End Users.



Medium Impact:  
None.









Low Impact:  
None.

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# 1 Summary

## Is this a Self-Governance Modification?

Scotia Gas Networks (SGN) do not consider that this proposal meets the criteria for self governance as its implementation would have a material impact on Distribution Network charges, existing or future gas consumers, competition between gas shippers and the operation of one or more pipeline systems.

## Why Change?

Under the current UNC arrangements the DN can only offer LDZ Capacity on a firm supply basis for the full 12 months of the gas year on an enduring basis. The DN's licence requires that the network is designed to meet 1:20 year winter conditions. In circumstances where an end user requires a new connection to the DN's network or an existing customer requires additional capacity, but may only require the entire Supply Point capacity for a seasonal period due to operational requirements, the DN must still analyse the whole load as if it were connected for the full 12 months of the gas year. As the DN includes this new connection / additional capacity requirement in its analysis of the network at 1:20 conditions there may be a requirement to reinforce the network to meet this new demand. In reality the end user may not require this LDZ Capacity at 1:20 conditions and hence the reinforcement is not actually required. There may also be existing Large Supply Points which do not require an increase in their capacity but in reality only access the capacity across the summer period. This Modification looks to change the current regime to permit new and existing Large Supply Points to have rights to LDZ Capacity for a reduced period (Off-peak) within the gas year potentially avoiding reinforcement costs. The Modification also looks to reflect these reduced LDZ Capacity rights in the transportation charges incurred by the Shipper for LDZ System (Capacity) charges.

## Solution

SGN have provided a solution and a set of business rules detailed below for discussion at the workgroup. SGN recognise there may be alternative solutions which industry participants may wish to discuss further at the workgroup.

SGN consider an appropriate solution to this issue would be to permit the DN to offer rights to LDZ System capacity to a gas Shipper (on behalf of their end user) for a reduced time period within the gas year to meet the end user's actual seasonal requirement. This modified regime would be restricted to new and existing Large Supply Points with a proposed / existing Annual Quantity greater than or equal to 5,860,000Kwh. The DN would charge the LDZ Customer Charge, LDZ Commodity Charge and the NTS Exit Capacity Charge (ECN) to the Large Supply Point for the full 12 month period, however the LDZ System Capacity Charge would only be applied for the months within the gas year as agreed between the DN, Shipper and the end user to meet this off-peak seasonal requirement.

## Impacts and Costs

Implementation of the modification would have the effect of reducing or removing costs relating to network reinforcement to both the end user (where chargeable cost may arise following assessment against the economic test) and / or the DN, where seasonal only capacity is required. Where the requirement for reinforcement was removed access to Seasonal LDZ Capacity would be timelier. Also, as the Shipper (and end user) would only be permitted rights to LDZ Capacity for specific months within the gas

requirement. Avoidance of unnecessary general reinforcement costs would also benefit all Shippers and end users by reducing overall costs associated with operation of the gas transportation network.

There will be Xoserve system / invoicing costs associated with the implementation of the Modification. Xoserve have been engaged in relation to preliminary analysis of system changes.

## Relevant Objectives

Further relevant objectives a), b) and c). Implementation costs & timescales are not known at this point.

## Implementation

***No implementation timescales are proposed.***

## 2 Why Change?

### **Background:**

Under current UNC arrangements in circumstances where an end user requests a new connection to the Distribution Network (DN) or an increased capacity requirement at an existing Supply Point the DN will provide a Siteworks quote to allow the Supply Point to burn gas on a firm supply basis. This Siteworks quote may include specific reinforcement costs (to both the customer and / or the DN depending on the outcome of the Economic Test calculation) to ensure that the network can provide the additional capacity requirement at 1:20 year winter conditions. The DN would charge the relevant Shipper LDZ System Capacity charges at the new or existing Supply Point based on the SOQ for the full 12 months of the gas year on an enduring basis. This would be reflected in the end user's Supplier gas bill.

In certain circumstances the DN may receive a new connection request / capacity increase request from an end user who requires the capacity only to be made available for a specific period during the gas year, for example if the end user's requirements are seasonal, such as a seasonal agricultural process load. The current arrangements do not allow the DN to offer rights to the required LDZ capacity for a reduced period of time, e.g. 6 months of the gas year to match this seasonal requirement and also to invoice the LDZ System Capacity charge based on the same reduced period.

As a result the DN must provide a Siteworks quote to the end user for a firm gas supply which may include significant network reinforcement costs to provide 1:20 capacity which is not actually required by the end user.

There may also be existing customers who have a seasonal off peak capacity requirement who do not require an increase in capacity and are currently obliged to hold a 12 month peak capacity commitment. It may also be feasible for these customers to switch to a seasonal product.

SGN consider that incurring costs to reinforce the gas network to meet a new or existing capacity requirement which is not actually required by the end user at 1:20 does not meet the efficient and economic operation of the pipeline system relevant objective. SGN consider a more appropriate solution to be a modification to the UNC to permit the DN to offer capacity for a reduced time period within the gas year to the Shipper / end user to negate the requirement for network reinforcement. Linked to this, SGN consider that as the network capacity would only be provided for a restricted off-peak period during the gas year it would be equitable only to charge based on this restricted off-peak period. The LDZ System Capacity charge, which reflects the capacity costs on the network would reflect the

charge, LDZ System Commodity charge and the NTS Exit Capacity charge (ECN) would continue to be charged on the existing basis for the full 12 months of the year. SGN consider these costs would continue to be incurred by the Supply Point and therefore it would be appropriate not to change these arrangements.

Background to the Solution contained within this UNC Modification Proposal:

SGN received a new connection request in December 2012 for a newly connecting large load which would require a substantial network reinforcement project, costing several millions of pounds to provide the additional capacity necessary to meet the new demand at 1:20 year winter conditions. Following discussions with the end user it became apparent that the end user's actual process load requirements only necessitated the capacity being made available for a limited number of months within the gas year. Their process load requirement is associated with a seasonally linked event which, once analysed on network models, proved not to require network reinforcement outside of the winter period. The time period associated with constructing the network reinforcement to meet 1:20 winter conditions would also be substantial and would delay the end user's access to network capacity and in turn reducing the attractiveness of a gas connection altogether.

The only option currently open to SGN and the end user is as follows:

- SGN to provide a Siteworks response to the customer detailing the network reinforcement costs and timescales associated with the new demand to meet 1:20 conditions.
- This option would entail the construction several kms of reinforcement pipe work costing several million pounds to allow the customer to access their capacity requirement for 12 months of the gas year.
- The customer does not require the capacity to be made available for 12 months of the year and has indicated that the requirement is only for an off-peak timeframe.
- SGN's network is capable of providing the additional capacity without reinforcement during the off-peak timeframe.
- The adoption of this option would result in unnecessary cost and effort to both the customer and SGN.
- The customer's access to their required capacity volume could be unnecessarily delayed due to the timescales associated with the reinforcement project.
- The capacity made available by the reinforcement project at 1:20 winter conditions, although not utilised by the end user, would in effect be sterilised on an enduring basis as the end user would be paying for a firm contract and would have rights to utilise the capacity if they so wished.

Current & potential UNC Capacity Interruption options:

For clarification only; the current interruption arrangements (as introduced by MOD 090) and the greenfield interruption arrangements (as introduced by MOD 0420) are discussed below in relation to this Modification Proposal. Both the arrangements introduced by MOD 090 and the arrangements included within Mod 420 do not provide a suitable solution to the issue of newly connecting seasonal loads or existing Supply Points which only require capacity on a seasonal basis.

Arrangements introduced following the implementation of UNC Modification 090:

Following the implementation of UNC Modification 090 (Revised DN Interruption Arrangements) on the 1<sup>st</sup> April 2008 the option to offer a shipper / end user an enduring interruptible contract was removed. Instead, the option was provided to the DN to contract for interruption on the network to offset reinforcement costs associated with growth on the network. Although SGN support these arrangements and have been active in adopting the newly modified regime in relation to contracting for interruption, the arrangements introduced by MOD 090 do not provide an enduring solution to allow the economic connection of new, large seasonal demands. As the MOD 090 regime is restricted to demands already connected to the system, newly connecting demands would not be able to participate in a DN contract for interruption until they were actually connected to the network. Also, were the DN to agree to connect the new demand without reinforcing the network on the basis that once connected the DN would enter into contractual / commercial interruption terms with the Shipper / end user, the MOD 090 regime only permits a contractual agreement between the DN and the Shipper for a maximum of 8 years. There is a potential risk that the Shipper / end user would not agree to continuing the interruption agreement past the 8<sup>th</sup> year resulting in significant reinforcement costs to the network which (a) would not actually be required by the end user and (b) should have potentially been funded in part or in whole by the end user during the initial site work's process.

UNC Modification 0420 (New Connections Interruptible Loads):

Modification 0420 allows an interruptible contract to be entered into between the DN and the Shipper in relation to a new Supply Point to allow the customer to connect to the network prior to the construction of significant network reinforcement as detailed in the Siteworks Agreement. The arrangements Modification 0420 introduced would not provide a solution to the requirements of newly connecting seasonal loads / capacity increases. Although the implementation of Modification 0420 has permitted greenfield sites to enter into interruption arrangements with the DN, the basis of Modification 0420 is only to permit connection to the system until the necessary specific reinforcement has been completed.

Restriction to new Large Supply Points:

The changes to the UNC associated with this Modification Proposal are restricted to new and existing Large Supply Points only with a Proposed or existing AQ  $\geq 5,860,000$ Kwh located on the DN's network, i.e. not applicable to NTS Supply Points. New and existing Small Supply Points and new / existing Large Supply Points with an AQ  $< 5,860,000$ Kwh are excluded from the changes this Mod would introduce as it is considered that a seasonal capacity product would not be attractive to such Supply Points. Also it is less likely that an individual supply point of this size would require future reinforcement to facilitate its new or continued connection to the network. Therefore it is considered that offering the product this Modification would introduce to this extent would not be required. SGN would however consider expanding the eligibility to participate in the amended regime this Mod would introduce

for Large Supply Points with an AQ <5,860,000Kwh if (a) demand for such product was indicated by Shippers / end users and (b) GDN systems and processes could facilitate this expansion on an efficient and economic basis.

### 3 Solution

SGN have provided a solution and a set of business rules detailed below for discussion at the workgroup.

The solution associated with this Modification proposal would permit the DN to offer firm network capacity for a reduced period across the gas year as agreed with the end user during the Siteworks process or the Shipper / end user during a capacity referral. This option would only be made available for new and existing Large Supply Points with a proposed or existing AQ  $\geq$ 5,860,000Kwh. The DN would charge the LDZ System charge to the relevant Shipper to reflect the period when the LDZ Capacity was made available.

As the introduction of these arrangements may provide an opportunity for the registered User to reduce the SOQ outside of the restricted capacity period (and hence avoid charges associated with the capacity element of the LDZ Customer charge & the NTS Exit Capacity charge) a 12 month commitment would apply to the registered LDZ Capacity at the Supply Point. Also, currently the Supply Point ratchet rules and LDZ CSEP overrun rules do not apply during the months of June to September (ratchet charges + SOQ ratchet). This would permit a seasonal Supply Point to register a SOQ value which was lower than actually required and hence benefit from non-cost reflective capacity charges. Therefore, the SOQ at a seasonal Supply Point would ratchet in line with actual consumption for 12 months of the year. Following initial discussions with Xoserve a potential solution to allow the timely implementation of the proposal would be to utilise the existing commercial interruption system solution, i.e. the application of a contract stipulating the terms of the arrangement against the Supply Point.

#### Business rules:

1. A qualifying Supply Point opting to be a seasonal Supply Point (once agreed with the DN) would be defined as a Seasonal Large Supply Point (SLSP).
2. These modified arrangements would only apply to new and existing Large Supply Points with a Proposed or existing Annual Quantity  $\geq$ 5,860,000Kwh.
3. The new SLSP must be Daily Metered and would be classified as a Mandatory DM Supply Point.
4. The SLSP would be permitted to access the registered Supply Point Capacity during a Restricted Capacity Period (RCP) and the SLSP would not be permitted to access the registered capacity outwith the RCP as specified in the Siteworks Agreement and / or the NExA.
5. The RCP would be defined and set by the DN for each SLSP and would commence on or after 1<sup>st</sup> April and terminate on or before 30<sup>th</sup> September of the same calendar year.
6. If the RCP could not provide the registered capacity and / or capacity across the correct time period for the end user's requirements then the existing Siteworks / UNC arrangements would apply and the Supply point would not qualify as a SLSP.

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7. Were the SLSP to access network capacity outwith the RCP the Shipper would be charged the Annual Rate of the LDZ Capacity Charge multiplied by the volume offtaken for each day of the occurrence.
8. The arrangements would be incorporated into a Network Exit Agreement (NeXA) which would stipulate the Network Exit Provisions and where applicable a Siteworks Agreement between the DN and Siteworks Applicant.
9. The DN will charge the LDZ System Capacity Charge for the months where the DN makes the capacity available to the SLSP reflecting the RCP.
10. All other DN transportation charges would be invoiced to the SLSP following existing rules.
11. The User would nominate the SOQ and SHQ value annually to commence on the first day of the RCP. Where no nomination occurs the existing SOQ/SHQ would roll over.
12. The SOQ value at the SLSP would be registered for 12 months from the first day of the RCP each year and could not be reduced or increased (except via a ratchet occurrence) prior to the first day of the RCP in the following year.
13. The SOQ value at a SLSP would ratchet in line with actual consumption for 12 months of the year. Ratchet charges would apply for 12 months of the year.
14. LDZ CSEP Overrun rules would apply for 12 months of the year for Seasonal LDZ Metered CSEPs.
15. Any requested change to the terms and conditions included in the Siteworks agreement / NeXA relating to modifications to the RCP or registered LDZ Capacity (SOQ and SHQ) would require a referral to the DN and subsequent DN confirmation of the change.
16. The current Bottom Stop SOQ rules would continue apply to a SLSP.
17. NTS Supply Points are excluded from these arrangements.
18. LDZ CSEPS are included within these arrangements.

#### User Pays

Classification of the modification as User Pays, or not, and the justification for such classification.

~~User Pays Modification Proposal— it is expected that the implementation of this Modification proposal would result in incremental Transporter Agency costs. Not User Pays as this modification will not amend or create a User Pays service~~

Identification of Users of the service, the proposed split of the recovery between Gas Transporters and Users for User Pays costs and the justification for such view.

~~To be considered once finalised. No Applicable~~

Proposed charge(s) for application of User Pays charges to Shippers.

~~To be considered once finalised. Not applicable~~

Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.

~~To be completed before a modification is issued to consultation. Not applicable~~

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## 4 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 (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	Positive
c) Efficient discharge of the licensee's obligations.	Positive
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.	None
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

Link to relevant objectives.

a) Efficient and economic operation of the pipe-line system:-

SGN consider this Modification Proposal would impact on the efficient and economic operation of the pipeline system in two ways: (1). Unnecessary expenditure, both by the DN and potentially the Siteworks Applicant on pipeline reinforcement to facilitate capacity which is not required is un-economic. (2). By providing the option to utilise off peak capacity only (without the cost of making peak capacity available at the same time) the DN would be encouraging the more efficient use of exiting capacity.

b) Coordinated, efficient and economic operation of (i) the combined pipeline system.

SGN consider this Modification Proposal would impact on the efficient and economic operation of the combined pipeline system in the following manner: Capacity bookings made with National Grid Transmission to reflect the Distribution Network's capacity requirement on the National Transmission system are booked on an annual basis and reflect the peak requirement on the DN's network. The bookings are made on a flat volume value across the year: therefore the off peak / summer bookings are in excess

of the actual requirement on the DN's network. The implementation of this Modification Proposal would allow the DN to make more efficient use of the excess off-peak NTS Exit capacity bookings whilst reducing the requirement to increase the peak winter bookings.

(c) Efficient discharge of Licensee's obligations.

SGN consider this Modification Proposal would impact on the efficient discharge of the licensee's obligations in the following manner: One of SGN's licence outputs is to consider the requirements of its stakeholder organisations, one of which is the end user community. As end users have indicated to SGN that a seasonal capacity product would be advantageous to their businesses SGN consider that the implementation of this Modification proposal would meet this requirement. Also, SGN are obliged to meet 1 in 20 year capacity provision on its networks through the most efficient and economic means possible. SGN consider that the implementation of this Modification Proposal would offer an additional opportunity to achieve this requirement.

## 5 Implementation

No implementation timescales are proposed.

## 6 Legal Text

### TEXT

The legal text has been provided in response to a request from the Panel and is published alongside this modification.

## 7 Recommendation

The Proposer invites the Workgroup to:

- Assess this modification and agree it should be issued to consultation.