

## Stage 01: Modification

# 0471:

## Amending the start time that a Day-ahead Market Offer can be accepted

At what stage is this document in the process?



*This modification seeks to amend the start time for which the Day-ahead On-the-day commodity market contract can be accepted from 12:00 to 08:00, to align with the Day-ahead power auction.*

The Proposer recommends that this modification should be:



- subject to self-governance; and
- proceed to consultation.



High Impact:



Medium Impact: Shipper Users, Trader Users, National Grid NTS



Low Impact:

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## About this document:

This modification will be presented by the proposer to the panel on 21 November 2013.

The panel will consider the proposer's recommendation, and agree whether this modification should be subject to self-governance; and whether it should be issued for consultation or be referred to a workgroup for assessment.



Any questions?

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# 1 Summary

## Is this a Self-Governance Modification?

EDF Energy's recommendation to the modification panel is that this modification meets the Self-Governance criteria since only a small change to the UNC text is envisaged which is not expected to have a material impact on competition between Shipper Users, nor on operation of the pipeline system. The main impact that is anticipated is only on the timing of trades, which may allow earlier notification of planned running times for some CCGTs. While these are welcome and positive impacts, they are not considered to be material.

## Why Change?

Currently the On-the-day commodity market (OCM) daily Non-physical Market Transaction product opens for trading from 12:00 Day-ahead until 03:35 calendar day following the gas Day. New auctions in the power market have been implemented and will take place from 11:00 Day ahead. This modification proposes to facilitate Day-ahead trading at this earlier time and for the product to therefore open for trading at 08.00 instead of 12.00. Please note that trades in this product contribute to the calculation of System Average Price (SAP).

The reason for this change is to amend the timing specified in the UNC which currently prevents alignment with the power auction, which would allow Shipper Users and Trader Users to efficiently trade the gas and power spark for CCGTs, especially on the weekend when gas trading liquidity is thin.

## Solution

The OCM trading hours are written into the UNC TPD Section D. The modification proposes to bring forward the start time of the OCM by four hours from 12:00 to 08:00.

This will also require changes to the Gemini platform and to ensure that the SAP calculation is updated to include this change to the OCM trading hours.

## Relevant Objectives

The impact of the modification will be that Shipper Users and Trader Users are able to trade the OCM Daily Title product on the OCM market from 08:00 Day-ahead. This will increase liquidity and ensure that the gas demand for CCGTs can be efficiently traded at the same time as the Day-ahead power auctions. This is particularly important on the weekend when gas trading liquidity is thin because of the lack of over-the-counter (OTC) market. These trades will also contribute towards the SAP reference price.

This meets Relevant Objectives A, B, D and indirectly supports objectives in line with G.

## Implementation

The implementation costs are at this point unknown although Xoserve has indicated they are not thought to be material and will be sub £100k.

While no implementation timescale is proposed, implementation is sought as soon as possible given that the Day-ahead power auction is commencing in November 2013.

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## 2 Why Change?

Shipper Users can buy or sell gas on the OCM, which is a screen-based gas trading market that allows Shipper Users to balance their daily gas positions. The terms and conditions relating to the operation of the Trading System are in UNC TPD section D.

Under the current terms and conditions Shipper Users are able to trade three products, which consist of:

- Non-physical Market Transaction (Title);
- Physical Market Transaction (Physical); and
- Locational Market Transaction (Locational).

ICE Endex is the assigned Trading System Operator for the OCM<sup>1</sup>. Of the three products, Title is the most liquid and runs from 12:00 Day-Ahead until 03:35 calendar day following the gas Day

In the GB electricity wholesale market there has been a drive to improve liquidity. One of Ofgem's liquidity objectives for the electricity market is to 'promote an effective near term market which enables all companies to buy the power they need for their customers'<sup>2</sup>.

One of the initiatives to achieve this has been the introduction of a Day-ahead GB Power auction. Following the North Western Europe (NWE) price coupling project the Day-ahead GB Power Auction gate closure will be 11:00. One of the barriers to the market using this auction is that prior to gate closure traders wanting to use the auction to schedule CCGTs Day-ahead need to have a reference gas price. As there is not a liquid Day-ahead gas market on the weekend until 12:00 this means that it is not possible to trade the spark spread in the auction due to the lack of a reference price. This is cited by many market participants as a primary reason for under-utilising the auction. This is not a significant issue on the weekdays as there is liquid OTC market.

If a CCGT operator is not able to trade both power and gas legs simultaneously then they are unable to lock in the gas/power spark spread, therefore are unlikely to use the auction. This is due to there not being a visible reference price by which to ensure the plant is being dispatched at a positive spark spread. Realistically, Shipper Users will need a gas reference price 1-2 hours before the Day-ahead power auction submission time of 11:00. Therefore it is proposed to open the Day-ahead OCM gas market at 8:00 in order to allow sufficient liquidity to be established before this time.

Being able to better schedule CCGTs at an earlier stage Day-ahead will improve system balancing in both the power and gas markets. If Shipper Users know what CCGT units are economical to dispatch Day-ahead then they will be able to send earlier physical gas nominations to National Grid NTS.

This modification suggests bringing the gas Day-ahead OCM trading start times in line with that for the GB power market to allow for more efficient trading.

The OCM platform only allows trading of the Day-ahead contract after 12:00. This is due to the fact that the UNC specifies that the contract is only available from 12:00 on the Day preceding the Market Offer Date. Note these timings are linked to the Gemini system.

Note, while only weekend liquidity has currently been identified as a particular issue (due to the OTC market being available weekdays) the modification is requested for seven days a week as this reduces the complexity of the change for ENDEX and Gemini, and simplifies operations for Shipper Users and Trader Users.

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<sup>1</sup> In accordance with UNC TDP D2.1

<sup>2</sup> <https://www.ofgem.gov.uk/electricity/wholesale-market/liquidity>

### 3 Solution

It is proposed that the following sections of UNC TPD Section D are modified as below, to change the start time from 12:00 to 08:00.

#### 2 TRADING ARRANGEMENTS

##### 2.1.3 For the purposes of the Code:

(a) **"Trading System"** is an electronic trading system provided and operated by the Trading System Operator for the purposes described in paragraph 2.1.1; provided that references to the Trading System shall not include any part of such system by means of which transactions other than Market Transactions may be effected, or by means of which Market Transactions (other than Multi-Day Balancing Transactions) may be effected earlier than the 08:00 ~~12:00~~ hours on the Day before the Gas Flow Day;

#### ANNEX D-1

5.1 Except in the case of Multi-Day Balancing Transactions, Market Offers in respect of a Market Offer Date will be capable of acceptance by Trading Participants between 08:00 ~~12:00~~ hours on the Day preceding the Market Offer Date and 03:35 hours on the Market Offer Date. Market Offers in respect of Multi-Day Balancing Transactions will only be capable of acceptance by Trading Participants between 08:00 ~~12:00~~ hours on the Day preceding the first Day to which the Multi-Day Balancing Transaction relates and 03:35 hours on the first Day to which the Multi-Day Balancing Transaction relates

#### User Pays

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

*This Proposal is User Pays as Xoserve have indicated that a supporting Gemini change will be required.*

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.

*It is proposed that costs be split between Shipper Users on an equal basis.*

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

*It is proposed that the charge is attributed to Shipper Users on an equal basis.*

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

*To be confirmed by Xoserve when costs are known. Indications are that these will not be material, and in the sub £100k category.*

## 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.	None
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.	Positive
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

This modification proposal, if implemented, would have a positive impact on Relevant Objectives (a), (b) and (d).

In relation to Relevant Objectives (a) and (b) This modification will allow more efficient and earlier Day-ahead scheduling for CCGT operators and therefore lead to more efficient pipe-line system balancing. If a Shipper User knows which of its CCGT units will be run for D at 8:00 Day-ahead instead of 12:00 then it will be able to send earlier Physical Nominations to National Grid NTS. This will mean that National Grid NTS will have more advanced notice of physical flows across the system and will have an increased ability to forecast how to co-ordinate and operate the National Transmission System (NTS) more efficiently and effectively.

In relation to Relevant Objective (d) this modification proposal, if implemented, will increase effective competition between Shipper Users by making it possible to schedule gas plant earlier Day-ahead, in line with other thermal generation. Without this modification, the situation in the market could exist where less efficient coal generation is scheduled rather than more efficient gas generation.

Further we believe that this modification proposal will improve liquidity in both the prompt gas (and power) markets in line with Ofgem, EC and ACER objectives to improve liquidity across the energy markets. Increased market opportunities and increased liquidity are expected to facilitate the securing of effective competition.

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## 5 Implementation

No specific implementation date is proposed.

## 6 Legal Text

It is proposed that Section D of the UNC is modified as below, to change the start time from 12:00 to 08:00.

### 2 TRADING ARRANGEMENTS

#### 2.1.3 For the purposes of the Code:

(a) **"Trading System"** is an electronic trading system provided and operated by the Trading System Operator for the purposes described in paragraph 2.1.1; provided that references to the Trading System shall not include any part of such system by means of which transactions other than Market Transactions may be effected, or by means of which Market Transactions (other than Multi-Day Balancing Transactions) may be effected earlier than the 08:00 ~~12:00~~ hours on the Day before the Gas Flow Day;

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## 7 Recommendation

The Proposer invites the Panel to:

- Determine that this modification should be subject to self-governance;
- Determine that this modification should progress to Consultation.