

Representation - Draft Modification Report 0519

Harmonisation of Reference Conditions at Interconnection Points

Responses invited by: **24 April 2015**

Representative:	Phil Hobbins
Organisation:	National Grid NTS
Date of Representation:	24 th April 2015
Support or oppose implementation?	Support
Relevant Objective:	g) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

As Proposer, National Grid NTS fully supports the implementation of this Modification for the reasons given in the Modification.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

'Matching' of nominations by National Grid NTS and each of its Adjacent TSOs is scheduled to be implemented from 1st October 2015, however compliance with the Interoperability Network Code is not required until 1st May 2016. National Grid NTS is unable to deliver the IT system changes to facilitate this Modification until its 'EU Phase 3' Gemini release in Spring 2016.

National Grid NTS has discussed implementation timing with its adjacent TSOs and the position at each IP is as follows:

IUK: IUK and National Grid NTS will commence matching nominations at 15/15 reference conditions on 1st October 2015. National Grid will advise IUK and Users of the implementation date of its EU Phase 3 Gemini release when it is available. IUK and NGG will then 'switch' to matching shipper nominations at 0/25 reference conditions from that date.

BBL: BBL are unable to accommodate matching at 15/15 on a temporary basis. Therefore, 0/25 matching will need to take place from 1st October 2015, meaning that shippers entering gas into the NTS through the BBL IP will, temporarily, be marginally 'under-allocated' compared to the 15/15 allocations that will apply at all other NTS entry and exit points. National Grid NTS intends to present analysis to quantify the impact of this as part of its shipper engagement in respect of the BBL IA consultation this Summer.

Moffat: Premier Transmission Limited, Gas Networks Ireland and National Grid NTS are currently seeking approval from Ofgem, the Northern Ireland regulator and the Republic of Ireland regulator to enact Article 13(3) of the Interoperability Code in respect of the Moffat IP. This would mean that 15/15 conditions would endure at Moffat and hence the

Modification 0519 solution would not be applied at that IP. National Grid NTS will notify Users of the regulators' decision in respect of this matter.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

This Modification is part of a wider suite of UNC changes which need to be implemented in order to comply with the European Network Codes. No specific costs have been identified for this Modification. National Grid NTS has been allocated some funding for EU market facilitation through the RIIO-T1 price control process. National Grid NTS expects to be able to use this funding to meet the costs of this EU related change to the allocations regime at IPs. Should this funding prove insufficient then this will be addressed through the RIIO-T1 mid-point review.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

National Grid NTS is satisfied that the legal text delivers the intent of this Modification within a new part of the UNC - the European Interconnection Document (EID).

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No.

Please provide below any additional analysis or information to support your representation