

NTS Charging Methodology Forum (NTSCMF) Minutes
Tuesday 05 January 2021
via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Karen Visgarda (Secretary)	(KV)	Joint Office
Adam Bates	(AB)	South Hook Gas
Alsarif Satti	(ASa)	Ofgem
Alex Nield	(AN)	Storengy
Andrew Pearce	(AP)	BP
Anna Shrigley	(AS)	Eni Trading & Shipping
Anna Stankiewicz	(ASt)	National Grid
Bill Reed	(BR)	RWE
Brian McGlinchey	(BG)	Vermilion Energy
Christiane Sykes	(CS)	Shell
Colin Williams	(CW)	National Grid
Daniel Hisgett	(DHi)	National Grid
Dave Bayliss	(DB)	National Grid
Debra Hawkin	(DH)	TPA Solutions
Drew Sambridge	(DS)	Cadent
Henk Kreuze	(HK)	Vermilion Energy
Jeff Chandler	(JCh)	SSE
Jennifer Randall	(JR)	National Grid
Julia Haughey	(JH)	EDF Energy
Julie Cox	(JC)	Energy UK
John Costa	(JCo)	EDF Energy
Jonathan Trapps	(JT)	Northern Gas Networks
Kamla Rhodes	(KR)	ConocoPhillips
Kirsty Ingham	(KI)	ESB
Kieran McGoldrick	(KG)	National Grid
Laura Johnson	(LJ)	National Grid
Laura Waldron	(LW)	Engie
Lucy Manning	(LM)	Grain LNG
Nick Wye	(NW)	Waters Wye Associates Ltd
Nigel Sisman	(NS)	Sisman Energy Consulting
Nitin Prajapati	(NP)	Cadent
Pavanjit Dhesi	(PD)	Interconnector UK
Paul Whitton	(PW)	SGN
Phil Lucas	(PL)	National Grid
Richard Fairholme	(RF)	Uniper
Ritchard Hewitt	(RHe)	Hewitt Home & Energy Solutions Ltd

Ricky Hill	(RH)	Centrica
Rosannah East	(RE)	National Grid
Sinead Obeng	(SO)	Gazprom
Smitha Coughlan	(SM)	Wales & West Utilities
Stephen Cross	(SC)	SGN
Tian Zhou	(TC)	Freepoint Commodities
Terry Burke	(TBu)	Equinor
Thomas Bourke	(TBo)	Ofgem
Vladislav Zuevskiy	(VZ)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/ntscmf/050121>

NTSCMF meetings will be quorate where there are at least six participants attending, of which at least two shall be Shipper Users and one Transporter is in attendance.

1. Introduction and Status Review

Rebecca Hailes (RH) welcomed everyone to the meeting.

1.1. Approval of Minutes (01 & 07 December 2020)

The minutes from both the December meetings 2020 were approved.

1.2. Approval of Late Papers

RH explained there had not been any late papers.

1.3. Modifications with Ofgem

Thomas Bourke (TBo) provided a status update regarding the Modifications with Ofgem as detailed below:

Modification 0686 Removal of the NTS Optional Commodity Rate with adequate notice. TBo explained that Ofgem had now de-prioritised this Modification.

Modification 0727 (Urgent) - Increasing the Storage Transmission Capacity Charge Discount to 80%. TBo confirmed Ofgem had approved this Modification on 18 December 2020 with an implementation date of 01 October 2021.

Modification 0748 (Urgent) - Prospective Removal of Entry Capacity Revenue from Capacity Neutrality Arrangements. TBo confirmed Ofgem had approved this Modification on 23 December 2020, and this was implemented on 01 January 2021. He noted the Open Letter to National Grid. Workgroup Participants expressed interest in discussing this letter further at the February meeting.

Modification 0728/A/B/C/D (Urgent) - Introduction of a Conditional Discount for Avoiding Inefficient Bypass of the NTS. TBo explained that a decision would be made in January 2021 and added that if a minded to approve position was proposed, then Ofgem would consult on the decision.

Modification 0729 - Applying a discount to the Revenue Recovery Charge at Storage Points. TBo explained that Ofgem were still considering this Modification and that a decision would be made in due course. Nick Wye (NW) said that this Modification had now been with Ofgem for quite some time and he was eager to know when a decision was likely. TBo reiterated that he was not in a position at the present time, to say when the decision would be made.

1.4. Pre-Modification discussions

1.4.1. Capping Price Increases for Quarterly System Entry Capacity (NW)

Nick Wye (NW) provided an overview of the proposed Modification, explained this Modification was being raised by Storengy, and it was based on the concept operated in Germany in relation to booking short-term capacity, but for this Modification there would be no hand-back.

NW then explained the rationale for the proposed change as detailed below:

Why Change:

- *The equalization of multipliers for Long-term and short-term entry capacity disincentives long term bookings.*
- *In some cases, long term bookings are required in order to underpin project investment, ensuring the rights to deliver gas into the NTS are secured.*

- *Long term capacity booking can be within obligated levels i.e., not requiring incremental expansion of the capacity.*
- *The implementation of Modification 0678A penalizes long term bookings, by introducing price instability, creating unmanageable risks for project developers (and their financiers).*
- *Quarterly System Entry Capacity (QSEC) bookings require that the User holds the same amount of capacity for each day within the quarter. Unless there is a Load Factor of 100%, QSEC holders are contributing to Allowed Revenue without return. A price cap solution will remedy some amount of cross-subsidisation.*
- *In addition, it is likely to discourage long term bookings, resulting in drive towards the short term. This will lead to revenue uncertainty, instability and price variability e.g., through fluctuating Revenue Recovery Charges (RRCs).*

Option:

In order to introduce some degree of price protection for long term capacity bookings, changes to the UNC must be made.

Solution:

- *Introduce a cap on the price increased for long term capacity bookings using the approach taken in Germany as a blueprint.*
 - *Cooperation agreement of grid operators permits the partial or full hand back of capacity where capacity prices increase by more than CPI.*
- *In each Gas Year the maximum price payable for long term entry capacity will be the price at the time of the booking (Auction Year Price) multiplied by the average CPI (for each year from the Auction booking Year to the Holding Year).*
- *E.g., if capacity was booked in Gas Year (GY) 2019, the maximum price payable in GY 2021 is Price set in the GY2019 auction adjusted for CPI over the period 2019 to 2021.*
- *The solution does not include the ability to hand back the capacity, but caps the payable price.*

Recommended Steps:

Not subject to Self-Governance because of the impacts on the commercial activities related to the shipping, transportation and supply of gas where certain classes of capacity are subject to an alternative approach for arriving at the payable price.

Colin Williams (CW) asked if this was an enduring solution and NW explained that any booking after 05 April 2017 would be charged using the monthly CPI rate. NW said he would be supplying worked examples of when Capping Price Increases (CPI) were applied together with other associated analysis to add clarity of the process.

New Action 0101: Storengy (NW) to provided worked examples of when the CPI rate is applied together with other associated analysis regarding the proposed process.

Christiane Sykes (CS) requested that National Grid needed to undertake some data analysis in relation to the potential impacts of this Modification on the Short-Term Tariffs.

New Action 0102: National Grid (CW) to undertake data analysis in relation to the potential impacts of the proposed Modification - Capping Price Increases for Quarterly System Entry Capacity on the Short-Term Tariffs.

Both Henke Kreuze (HK) and Nigel Sisman (NS) wanted to know if non-unity (not 1) multipliers applied to different duration capacity products had been considered to address the pricing inequities identified within this Modification proposal. NS also indicated that such an approach might also address the distortion at exit created by the different booking approaches of DNs and transmission direct connects. NW said this was not in scope for this Modification and would be for another to raise in a Modification if considered appropriate.

NS also noted the concept of “fully floating” capacity prices (save for a limited exception in respect of earlier contracts under Article 35) had been fundamental within the EU Tariff Code (TAR NC). NS questioned, therefore, whether the proposed Modification could be considered legal. NW confirmed that this area would be detailed within the Modification.

Sinead Obeng (SO) enquired if the Modification would include traded and transfer capacity and NW said no, it was not in scope within this Modification.

RH asked from a Rough Order of Magnitude (ROM) perspective, was the assumption that this would be fully systemised or a manual workaround. NW said ideally a fully systemised system was preferable for the solution, but that a temporary workaround would likely need to be in place in the initial implementation stages.

Julie Cox (JCx) questioned the legal aspects in relation to Brexit and references to TAR NC and the Relevant Objectives. NW said he was not aware the Relevant Objectives had been or were going to be changed in this regard and Phil Lucas (PL) provided a brief explanation of how the EU regulations were being retained and how they were still presently valid in this context of UK law and from an overall compliance perspective.

Pavanjit Dhesi (PD) said if the price was fixed, how the risk premium would be addressed. NW said the risk premium would be zero, and he added there would be an element of retrospectivity to the proposal from the date of implementation. He added that there might be some interaction with the Revenue Recovery Charge (RRC), but this would depend on when National Grid set the RRC, and that this would be encompassed and would be qualified for this specific service.

A brief general discussion took place regarding the Postage Stamp impacts and NW agreed to provide some examples of pre and Postage Stamp scenarios to provide clarity.

New Action 0103: Storengy (NW) to provided pre- and post-Postage Stamp examples of pricing in relation to Capping Price Increases (CPI).

2. Workgroups

2.1. RH explained there were presently no Workgroups for discussion.

3. Forecasted Contracted Capacity (FCC) Monitoring

3.1. Update on Capacity bookings vs FCC with potential impact on Revenue Recovery Charges (RRC)

CW said an update would be supplied at the February meeting.

Richard Fairholme (RF) said that at the February meeting he would like to propose that an agenda item was included in relation to Modification 0748 and the smoothing of volatility and what plan National Grid was going to propose moving forward. He also said that within the Ofgem 0748 open letter to National Grid regarding Transmission Services Entry and Exit Revenue Recovery Charges, there were some specific areas that needed to be explored and addressed. CW agreed to provide information for the February meeting.

New Action 0104: National Grid (CW) to share the table that is used for setting the tariffs between now and May 2021.

New Action 0105: National Grid (CW) to commit to discussing the forecasting assumptions.

JCx also said that it would be helpful if an action could be placed on Ofgem for them to confirm that any revenue adjustment arising from reopeners will only ever be reflected in the annual iteration process and not result in changes to capacity charges or RRC.

New Action 0106: Ofgem (ASa/TBo) to confirm that any revenue adjustment arising from reopeners will only be reflected in the annual iteration process and not result in changes to capacity charges or RRC.

4. Issues

No new issues were raised.

5. Review of Outstanding Action(s)

0902: Joint Office to invite DNs to attend the January NTSCMF meeting to discuss the impact on DN charges for the new 0678A methodology regime from 01 October 2020.

To include; National Grid (CW) to investigate how the Tariff changes will be affected by any Licence changes after 01 April 2021.

Update: RH thanked the DNs for their attendance and said that the DNs were invited to the Workgroup to provide clarity on how the DN charges would be affected by Modification 0678A. She explained that the action was going to be addressed in two stages, with Colin Williams (CW) providing an overview of the second part of the action first.

National Grid (CW) to investigate how the Tariff changes will be affected by any Licence changes after 01 April 2021.

CW said that the changes would roll through to 2021 and more clarity would be supplied as things became clearer, to include a UNC tidy up process to marry the UNC up with the Licence drafting to include a few changes to also mirror the RIIO-2 arrangements. He added that the Tariff charges that were published on 30 December 2020 did not take into account any RIIO-2 figures and the RIIO-2 revenue figures would take effect from October 2021.

Anna Shrigley (ASh) sought clarification regarding the allowed revenues in relation to RIIO-2 and said she understood these had not been included in the adjustment that had been published, and that the adjustment would only apply from 01 February 2021. CW said the adjustment would be through the RRC and the timing would be dependent on the timing in the Gas Year and he added that the Capacity charges would be set, and any correction for cost neutrality would only be via the RRC.

Jeff Chandler (JCh) asked if National Grid were still proposing to raise the Retrospective Modification that had been discussed previously. CW said that this Modification was still being looked at and all the comments supplied to-date were being considered, and that it was likely to seek an urgency status.

A lengthy and protracted general discussion then took place in relation to the gas year, regulatory year close out and areas that would go into 'K' and addressed in 2 years' time. Jonathan Trapps (JT) asked if there was any option to have the RRC relaxed as there was a considerable shortfall around the RRC which was very complex. CW said there were no revenue values presently for the financial year and that this area was being investigated to provide another set of indicative prices for October 2021, and as such, detailed discussions were taking place. JT said with the 'K' element this would increase the costs and so Northern Gas Networks were presently in discussions with Ofgem regarding this matter. CW said he understood from a timing perspective it was not ideal from a DN true-up for the year viewpoint and added that 'K' would be moving from two year to a one year basis.

JCx concurred with JT's comments and said that this made a big change to the indicative charges which once again was leading to Industry uncertainty and confusion for Suppliers attempting to set contracts moving forward.

She asked Alsarif Satti (ASa) Ofgem to comment on this area. ASa he was not at liberty to comment on this area as his colleagues within the RIIO-2 were dealing with this and so he was not able to offer any guidance at the present time. JCx said as the DNs charges were changing in April 2021 she would appreciate an update from Ofgem at the next meeting. JT said that there was a two months' timing on publishing of tariffs and so he was hopeful to provide an overview from mid-January onwards.

JCx said she still had a concern regarding the fixed price contracts with a changing cost base, and it seemed to her that the DNs were possibly being given dispensation in this area. Paul Whitton (PW) said this was most certainly not the case at all and there were no special arrangements with Ofgem. He added the tariffs would be published in due course in the normal manner. He noted that discussions were taking place with Ofgem regarding the pass-through costs and any changes to October 2021 prices.

Vladislav Zuevskiy (VZ) asked as the gas year spans two regulatory years and is different to what was planned in relation to the published RRC, had this been taken into account regarding the Final Determinations (FD) revenue, and if not, could this be altered for this gas year. CW said that the updated prices did not include the final determinations and the next set of prices would be visible from October 2021 and that the existing charges were not going to be updated. He said in relation to what the prices may look like from October 2021 National Grid were investigating a best estimate view on revenue values from April 2021 onwards and that these would be heavily caveated.

CW explained that all these areas, including the regulatory and build up of tariffs would be discussed at the next webinar that was scheduled for Tuesday 12 January in the afternoon and stated that the invitation would be circulated in due course.

A general discussion took place concerning the Transmission Service Commodity charge and if it was staying at the same level and CW confirmed that was the case. JCx asked why the SO /TO and TS/nonTS revenue services had not been addressed and included within the Modification 0748, CW said this area had not been required within the Modification. JCx then said this whole area of TO and SO Transmission revenues was still not as yet documented anywhere and it needed to be, JCh concurred with this request, and added especially in relation to the TS/non TS services.

JCx said more information was also required with regards to the potential Licence changes concerning TPD section Y 1.5.1 (d)

"Allowed TS-Related NTS System Operation Revenue" is that amount of the Maximum NTS System Operation Revenue which is attributable (as determined by National Grid NTS) to charges in respect of NTS Capacity net of charges for the surrender of NTS Capacity;

<https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2020-12/24%20TPD%20Section%20Y%20-%20Charging%20Methodologies.pdf>

CW said he would provide a written explanation.

New Action 0107: National Grid (CW) to provide documented explanation and diagrams detailing the relationship between the SO /TO and TS/nonTS revenue services.

New Action 0108: National Grid (CW) to provide information regarding potential Licence changes and *TPD section Y 1.5.1 (d) "Allowed TS-Related NTS System Operation Revenue"*

This action was then closed. **Closed.**

Action 1201: National Grid (CW) to produce process flows to show the exit and entry revenue capacity to include the TOs and SOs.

Update: This action is closed and has been replaced by Action 0107, above.
Closed

Action 1202: National Grid (CW) to investigate how the Tariff changes will be affected by any Licence changes after 01 April 2021.

Update: CW said this action could now be closed as this topic had now been addressed.
Closed

Action 1203: All DNs to clarify how the ECN charges vary across exit points, including examples.

Update: Nitin Prajapati (NP) explained on behalf of Cadent that that the DNs had been asked to clarify the ECN charges and he then provided an overview of the table to detail below:

ECN Rate Worked Example

ECN Rate Worked Example		Network 1	Network 2
Description	Calculation/source	Value	Value
NTS Exit Capacity Rate	NTS published PS Charge	£0.0198	£0.0198
Exit Capacity volume for a network	Network Capacity Bookings (volume)	2,750,000,000	4,000,000,000
Exit Capacity Costs	PS Charge x Volume	£54,450,000	£79,200,000
NTS Cost Adjustment (2 lagged adjustment)	2 years prior difference between ECN Allowed Revenue minus Actual Costs	£(12,450,000)	£(16,000,000)
ECN Allowed Revenue (ECN AR)	NTS Cost Adjustment + Exit Capacity costs	£42,000,000	£63,200,000
Average SOQ per network	Average SOQ values for network provided by Xoserve	57,170,382	54,495,354
Average SOQ per Exit Zone	Average SOQ per Exit Zone values provided by Xoserve	3,105,368	1,454,609
Target Revenue at offtake	ECN AR / Average SOQ per network x Average SOQ per Exit Zone	£2,260,044	£1,953,880
ECN Rate	Target revenue / 365 / Average SOQ per exit zone	£0.0020	£0.0037

Please note this is just an example and not the actual rate to be used for 2021/22

The below is an extract from a decision letter provided by Ofgem surrounding the ECN Charge:

'The level of the LDZ ECN charges across Exit Zones will be set each year to reflect the forecast average unit NTS exit capacity costs for capacity at NTS/LDZ Offtakes within each Exit Zone for the forthcoming year plus or minus the appropriate K ECN under or over recovery.'

JCx questioned the almost factor of 2 resulting size change on the ECN rate as detailed above and said it appeared that the factor which contributed most significantly was the average SOQ per exit zone, and why was this different. NP said this table was merely an example of values that the DNs get from Xoserve for a peak day capacity at the exit zone if there is a variance at the SOQ. The other DNs said, when questioned by Nigel Sisman (NS) that they would have to check these variances as they did not presently have that analysis available.

Paul Whitton (PW) said in essence there were 2 different sets of numbers and other aspects for the over and under recovery, regarding the pass-through of the costs and the exit zone and the Postage Stamp rates were never the same. He said that the cost recovery was in two years' time and this would be materially above the Postage Stamp rate, and so there was the need to recover £13million over the two years.

NW said that historically prior to the Postage Stamp introduction this was true, but he disagreed with this statement now and did not understand why the process was not missing out the SOQ at the exit zone, as to him, it seemed that some parties could be paying higher charges at the exit zone whilst receiving the same service. PW said there was still an element of truncating of the rates and that this approach was still relevant, with regards to the exit zones. JCx concurred with the comments made by NW and she asked Ofgem for their view on this matter. ASa said he was not able to comment and that it was an area that should be further discussed with the Industry within the NTSCMF Workgroup.

A protracted general discussion took place in relation to the ECN charges, the Postage Stamp and the different charges at the NTS exit capacity zones and the charging base compared to the 1 in 20 bookings. It was agreed a new action would be raised requesting the DNs to indicate the difference between the 1 in 20 booking levels and their charging base.

New Action 0109: DNs to provide confirmation and indication of the difference between 1 in 20 bookings and their charging base(s).

JT said that the DNs were no longer incentivised on exit capacity anymore and this all seemed to be creating more work and increasing volatility off the back of Modification 0678A - Amendments to Gas Transmission Charging Regime. JCx said this entire area needed more thought and discussion from a pass-through perspective as costs are going to consumers. JT also questioned if this was the right process with the most applicable mechanics on this charge, and agreed it needed more exploration. ASa reiterated his earlier comments that this was an area that required further discussion to ensure the pricing process was robust and fit for purpose.

NW again said that NTS could charge directly when a customer was physically burning gas, as the impact on the NTS was exactly the same due to Postage Stamp and that any customer should pay the exact same rate. JCh concurred with this statement and said this present process gave Shippers issues as to when to charge customers. He added that it would be beneficial if the DNs could share with the Shippers how much capacity they were going to book, then the Shippers could produce accurate forecasts to enable quotes to be given to customers up to 3 years in advance.

New Action 0110: DNs to consider a move to a uniform charge or more transparency around the DN Charging element used for setting the ECN charge.

6. Any Other Business

6.1. National Grid Update on Regular Overrun Reporting

Anna Stankiewicz (ASt) explained that an update was going to be provided at the Transmission Workgroup on Thursday 07 January 2021 as part of AOB Item 6.3.

Please view the link below to access the Overruns Update Item 6.3.

<https://www.gasgovernance.co.uk/tx/070121>

7. Next Steps

RH said that the next meeting was scheduled for Tuesday 02 February 2021 with the usual standard agenda.

8. Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Workgroup meetings will take place as follows:

Time / Date	Venue	Workgroup Programme
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10:00 Tuesday 02 February 2021	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 02 March 2021	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 06 April 2021	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 04 May 2021	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 01 June 2021	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 06 July 2021	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 03 August 2021	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 07 September 2021	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 05 October 2021	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 02 November 2020	Via Microsoft Teams	Standard Workgroup Agenda
10:00 Tuesday 07 December 2020	Via Microsoft Teams	Standard Workgroup Agenda

Action Table (as at 05 January 2021)

Action Ref	Meeting Date(s)	Minute Ref	Action	Owner	Status Update
0902	08/09/20	6.0	<p>Joint Office to invite DNs to attend the January NTSCMF meeting to discuss the impact on DN charges for the new 0678 methodology regime from 01 October 2020.</p> <p><i>To include; National Grid (CW) to investigate how the Tariff changes will be affected by any Licence changes after 01 April 2021.</i></p>	Joint Office/ DNs	Closed
1201	01/12/20	1.4	National Grid (CW) to produce process flows to show the exit and entry revenue capacity to include the TOs and SOs.	National Grid (CW)	Closed

1202	01/12/20	6.0	National Grid (CW) to investigate how the Tariff changes will be affected by any Licence changes after 01 April 2021.	National Grid (CW)	Closed
1203	01/12/20	7.3	All DNs to clarify the ECN charges vary across exit points, including examples.	ALL DNs	Closed
0101	05/01/21	1.4.1	Storengy (NW) to provided worked examples of when the CPI rate is applied together with other associated analysis regarding the proposed process.	Storengy (NW)	Pending
0102	05/01/21	1.4.1	National Grid (CW) to undertake data analysis in relation to the potential impacts of the proposed Modification - Capping Price Increases for Quarterly System Entry Capacity on the Short-Term Tariffs.	National Grid (CW)	Pending
0103	05/01/21	1.4.1	Storengy (NW) to provided pre- and post-Postage Stamp examples of pricing in relation to Capping Price Increases (CPI).	Storengy (NW)	Pending
0104	05/01/21	3.1	National Grid (CW) to share the table that is used for setting the tariffs between now and May 2021.	National Grid (CW)	Pending
0105	05/01/21	3.1	National Grid (CW) to commit to discussing the forecasting assumptions	National Grid (CW)	Pending
0106	05/01/21	3.1	Ofgem (ASa/TBo) to confirm that any revenue adjustment arising from reopeners will only be reflected in the annual iteration process and not result in changes to capacity charges or RRC.	Ofgem (ASa/TBo)	Pending
0107	05/01/21	5.0	National Grid (CW) to provide documented explanation and diagrams detailing the relationship between the SO /TO and TS/nonTS revenue services.	National Grid (CW)	Pending
0108	05/01/21	5.0	National Grid (CW) to provide information regarding potential Licence changes and TPD section Y 1.5.1 (d) "Allowed TS-Related NTS System Operation Revenue"	National Grid (CW)	Pending

0109	05/01/21	5.0	DNs to provide confirmation and indication of the difference between 1 in 20 bookings and their charging base(s).	DNs	Pending
0110	05/01/21	5.0	DNs to consider a move to a uniform charge or more transparency around the DN Charging element used for setting the ECN charge.	DNs	Pending