

## **Storengy Consultation Response - Capacity Access Review (Jan-Feb 2020)**

### **General questions**

Q.1 Do you wish your consultation response to remain anonymous?

No

Q.2 How would you describe your interest within the gas industry? E.g. (Shipper, Distribution Network, Storage Facility Operator etc.) 7

Shipper, Storage Facility Operator, Allocation Agent

### **Long-Term Ambition Statement**

Q.3 On a scale of 1-10, (1-very strongly disagree, 10-very strongly agree). Do you agree with the long-term ambition statement set out by National Grid NTS in section 6?

8 – As well as being “dynamic and adaptable to accommodate new technologies and sources of gas”, it also needs to be dynamic and adaptable in the way it operates for existing users of capacity.

Q.4 Do you have any other comments to add regarding the ambition statement?

Storengy welcomes the ambition statement, and more flexibility for accessing capacity and more cost-effective products. However, a major element in achieving the long-term ambition statement will be development of the capacity booking and information systems, with the market moving towards shorter term, more instant booking of capacity when required. In light of current proposals to change gas charging, the development of the systems in providing more automation of booking processes, instant bookings, matching to nominations, and provision of real time information, becomes an urgent priority.

### **Future Functions**

Q.5 On a scale of 1-10, (1-very strongly disagree, 10-very strongly agree) Do you agree with the following functions set out by National Grid NTS in section 7.

Q.5a Signal a need for capacity requirements.

9 – With gas usage expected to decline in coming years, strains on the national network should also reduce, and so the need to signal capacity requirements may become less important in the longer term.

Q.5b Manage network access where there is a short-term constraint.

9 – Similar to Q.5a, with strains on the network expected to reduce, managing the network around short-term constraints may become easier, and therefore this may become less critical over time.

Q.5c Provide users with commercial certainty on network access.

10 – All users of the network need certainty over the costs of capacity, both in the short and long term, as well as assurances that any capacity required is available.

Q.5d Collect Transporter allowed revenue.

9 – The costs of developing, maintaining, and managing the network need to be paid and therefore the relevant monies collected. As these costs relate to the network it follows that the majority of the costs associated with this should be paid by the users of the network, however, with wider industry benefits it may be feasible for other members of the industry to contribute towards these costs.

Q.5e Enable new entrants, including new sources of gas and technologies, to easily and efficiently access the NTS.

10 – As the market transitions to new sources of gas and develops new technologies, it is vital that any new regime has the ability to encompass changes and developments, and that usage of the existing infrastructure is encouraged wherever feasible.

Q.6 Do you have any other comments regarding the 5 future functions?

Although Storengy agrees with these functions, none of these address the facilitation of how capacity products should be acquired, and how processes surrounding capacity can be better automated. Current systems mean that entry capacity automation and exit capacity automation are very different, especially in terms of long term bookings and APIs. In addition, with the market moving towards shorter term capacity bookings, especially in light of the proposed new gas charging, more automation is needed for within day and day ahead activity. Those acquiring capacity will need opportunities to acquire capacity both regularly and quickly during the day, ideally through fully automated processes. In addition, customers need to be able to see bookings information instantly and be able to easily compare these to nominations, again ideally through fully automated processes rather than via manually entering and reading information on GEMINI.

### **Short-Term Issues**

Q.7 Are there any other issues you are experiencing with the current regime that are not outlined in Section 9 Fig. 1?

Development of full matching capability for nominations and capacity bookings in GEMINI, ideally with capacity bookings being made automatically when nominations are placed, if capacity remains available to book.

Currently Allocation Agents are unable to view customer GEMINI nominations/capacity bookings for specific entry and exit points, and further APIs need to be developed to facilitate this.

Change systems to use Edigas communications to better facilitate automated processes.

Improve clarity of invoicing around capacity enabling customers to understanding billings and make bill payments simpler.

Any questions or responses to this consultation should be directed to Ashley Adams and Jennifer Randall at [Ashley.Adams@nationalgrid.com](mailto:Ashley.Adams@nationalgrid.com) and [Jennifer.Randall@NationalGrid.com](mailto:Jennifer.Randall@NationalGrid.com)

Responses should be received by Thursday 20th February 2020.