### UNC 0878:

Use of Entry Capacity Holdings at Easington at the Rough Storage ASEP in Winter 2024/2025

Proposer: Centrica Storage Ltd Panel Date: 20 June 2024

# Why change?

- To enable CSL and other Users to use long-term capacity holdings held at Easington at the Rough ASEP during winter 24/25 (an extension of UNC 0846).
- Similar justifications apply as set out in UNC 0817 and 0846
  - Enforced separation and creation of Rough ASEP undermines capacity bookings made at Easington, resulting in "stranded capacity"
  - Users of Rough should not pay twice for capacity
  - Without a baseline at Rough requires full reliance on discretionary release by NGT
- Alternative "longer term" solutions are not viable:
  - Entry into PARCA to signal substitution has minimum User commitment periods and "excessive security requirements";
  - Licence change to baselines (akin to the Bacton split UNC 0501V) is significant undertaking and not deemed appropriate by Ofgem at this stage

## Options

• Alternative solutions: PARCA and Licence change to baselines have been considered further and deemed not appropriate

• Extension of arrangements put in place via UNC 0846.

### Solution

 To extend the arrangements under UNC 0846 to permit the redesignation of entry capacity held at Easington to the Rough ASEP on a monthly basis via the rolling monthly surrender process

• As with UNC 0817 and UNC 0846 the qualifying capacity will be limited to capacity acquired before 4 August 2022 (the Easington Disaggregation Date)

• As with UNC 0846 the designation process is open to all Users (with qualifying capacity) at Easington, specific to the redesignation of capacity to the Rough Storage ASEP.

### **Recommended Steps**

- The Proposer recommends that this modification should be:
- Not subject to Self-Governance because it will have a material impact on security of supply and competition in the gas shipping sector
  - Workgroup assessment to develop the modification for 1 month as it replicates UNC 0846.
  - Given the need for implementation, if so directed by Ofgem, before the Rough withdrawal season commencing in Q4 2023.