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To all interested parties

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13th February 2023

National Gas Transmission's Consultation on ECS, ExCS and ECTT Methodology Statements and Reconsultation on ECR Methodology Statement

Dear Colleague

National Gas Transmission's Transporter License in respect of the NTS (the "Licence") sets out the obligation to develop and modify Capacity Methodology Statements. This includes:

- The Entry Capacity Release Methodology Statement (the "ECR")
- The Entry Capacity Substitution Methodology Statement (the "ECS");
- The Exit Capacity Substitution and Revision Methodology Statements (combined as one statement, the "ExCS"); and
- The Entry Capacity Transfer and Trade Methodology Statements (combined as one statement, the "ECTT").

As part of the review process for these statements, we are obliged to consult with interested parties on the proposed changes for a period of 28 days before formally submitting to the Authority for a decision. This letter identifies the proposed changes to all above mentioned methodologies.

• The ECR statement includes proposed changes in relation to entry capacity release at the Milford Haven ASEP in summer 2023. We have previously consulted on ECR changes related to this topic between 9th December 2022 and 13th January 2023¹. The industry feedback received in the consultation process led us to modify our proposal, a copy of which we submitted to Ofgem for consideration on 27th January 2023. The details of our amended proposal can be found in the NGG's Joint Response letter published on our website².

On 6th February the Authority did not approve our proposal³ noting that no interested party has had an opportunity to respond with comments on our amended proposal before it was submitted for a decision. As urged in the Ofgem decision letter, we are now re-consulting on the modified proposal with the intention to gather feedback and to re-

¹ 9th Dec 2022 ECR Consultation Cover Letter

² https://www.nationalgas.com/gas-transmission/document/141801/download

³ Decision on proposed revisions to the Entry Capacity Release Methodology Statement held by National Grid Gas Plc | Ofgem



- submit the proposal to the Authority for consideration. We also plan to accompany the proposal with an Independent Examiner assessment.
- The ECR, ECS, ExCS, and ECTT statements include updates to reflect National Grid Gas changing its name to National Gas Transmission Ltd following the sale of a majority shareholding by National Grid plc.
- The ECR, ECS, ExCS, and ECTT statements have further minor housekeeping changes.

ECR changes

Drivers for change

We believe the same drivers for change apply as per our original ECR consultation cover letter issued on 9th December 2022⁴. These drivers include the continued geopolitical situation in Europe, Norwegian maintenance planned for summer 2023 (potentially impacting UK gas supply), lower NTS network capability in the summer period and, as an outcome, the potential impact of LNG flows exceeding network capability leading to high constraint costs impacting customers and end consumers (please refer to the previous consultation letter for full details).

While we have no certainty constraints will occur (due to the lack of certainty around either flows at Milford Haven or the impact of the Norwegian maintenance), we have calculated the potential severity of constraint costs should the risk materialise. We have taken the feedback provided in the consultation onboard, and in response we have included new scenarios capturing a variety of inputs to demonstrate how the potential constraint costs for a sample day may change based on different assumptions. This has been included in Appendix 1.

As with any scenario analysis that has a number of assumptions and variables included, we are aware that there can be many outcomes, and with these elements and the current market conditions, it is very difficult to predict the magnitude of potential costs. Our analysis shows potential costs between £433K and £23m per day. In an enduring constraint the costs are likely to increase further and the total daily cost of constraint will need to be multiplied by the number of days the constraint lasts, with the increase factor added to the calculation.

Our original proposal, if approved, would have restricted the release of entry capacity at the Milford Haven ASEP in the period between 1st May – 30th September 2023. This would have aligned with the timeframes of scheduled Gassco maintenance when GB gas supply will be reduced. We believe it is reasonable to anticipate that any reduction in Norwegian supply will mean an increased number of cargos being delivered to GB when the additional supply is needed. Recognising the importance of LNG deliveries from a security of supply perspective, we are concerned that the increased Milford Haven flow potential and reduced summer physical capability of the network will increase the constraint risk and therefore impact our customers and consumers costs via constraint actions being required.

⁴ https://www.nationalgas.com/gas-transmission/document/141626/download



Justification for modification of the original proposal

• Gassco supply and maintenance

The Norwegian maintenance, as published on Gassco's website⁵, will affect flows to St Fergus in summer 2023 as follows:

Affected Asset	Туре	Event Start	Event Stop	Unit	Technica I Capacity	Availabl e Capacity	Unavailabl e Capacity	Reason
St				mcm/				Yearly
Fergus	Planned	24/05/2023	01/07/2023	d	30.8	5	25.8	maintenance
St				mcm/				Yearly
Fergus	Planned	01/07/2023	29/09/2023	d	31.2	0	31.2	maintenance

While the Technical Capacity available to flow to St.Fergus is 30.8mcm/d or 31.2mcm/d, during summer 2022 we saw a maximum of 6.4mcm/d delivered through St. Fergus (Vesterled pipeline) according to the Gassco website⁶. In summer 2021 the maximum flows reached 27mcm but averaged 3-4mcm/day.

The Gassco outages that have the potential to impact Easington flows are:

Affected	Туре	Event Start	Event Stop	Unit	Technic	Availabl	Unavailabl	Reason
Asset					al	е	e Capacity	
					Capacity	Capacity		
Nyhamna	Planned	19/05/2023	09/06/2023	mcm/	79.8	0	79.8	Yearly
				d				maintenance
Kollsnes	Planned	26/08/2023	07/09/2023	mcm/	153.0	0	153.0	Yearly
				d				maintenance

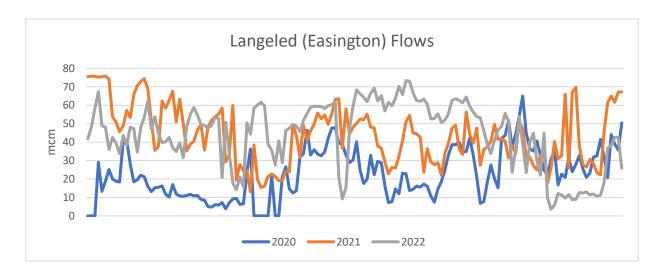
Under the working assumption that EU gas prices will be higher than GB prices during summer 2023, we expect these outages to result in a significant to total reduction in Easington gas supplies from Norway. The higher EU gas prices typically seen in summer months mean that the remaining Norwegian gas flows will be more likely to be directed to Europe, and not GB.

As shown below the Langeled flows delivered to Easington have been consistently high in the last 3 years in the summer period. Last year, the flows averaged 44mcm/day with the highest flow being 70mcm/day. This compares to 43mcm/day average flows in 2021 and a 75mcm/day highest flow.

⁵ <u>Gassco maintenance</u>

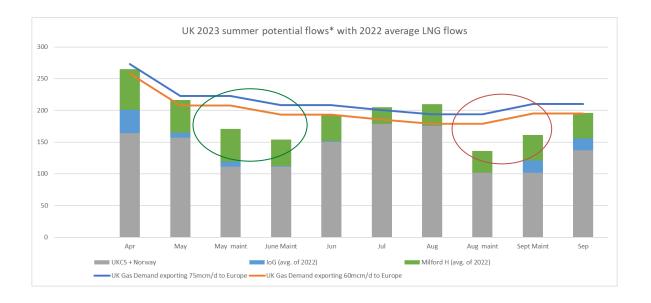
⁶ https://umm.gassco.no/ch/





Gassco maintenance – GB impacts

The chart below shows the expected average GB demand based on exporting either 60mcm/d or 75mcm/d to Europe, against the expected supply based on the average monthly flow of LNG in 2022 and the expected impact from the Gassco maintenance outages (as described above). With no or lower interconnector exports, the GB's demand would reduce and, there would be a reduced supply deficit needing to be met by other supply sources including MH / LNG flows.



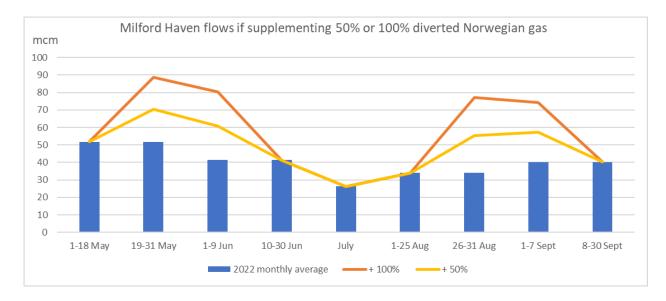
What the chart demonstrates is a clear demand for additional gas being delivered to GB in certain periods during the summer. The main periods impacted are May/Jun and Aug/Sep, but the supply/ demand position remains close in other months as well. It's worth noting that the graph above shows averages and not peaks.

Where the graph indicates that supply doesn't meet demand, this could be met by the market reacting by driving prices and as such potentially utilising gas out of storage, increased LNG



deliveries, reduced interconnector flows or increased Norwegian flows (again will be price based driven by GB/EU price differentials).

We have considered the potential constraint risk if Milford Haven flows were to increase to supplement all or a proportion of Norwegian gas being diverted to Europe during the maintenance periods. To model this, we have used the average monthly flow from summer 2022 and added 50% and 100% of the forecast Norwegian supply deficit for the specific periods of maintenance. The potential flows that would materialise at Milford Haven in these scenarios are illustrated in the graph below.



Considering the average summer Milford Haven capability is 65mcm/d, it is clearly visible that should additional gas be supplied in response to the Norwegian deficit, the flows are likely to exceed the physical network capability.

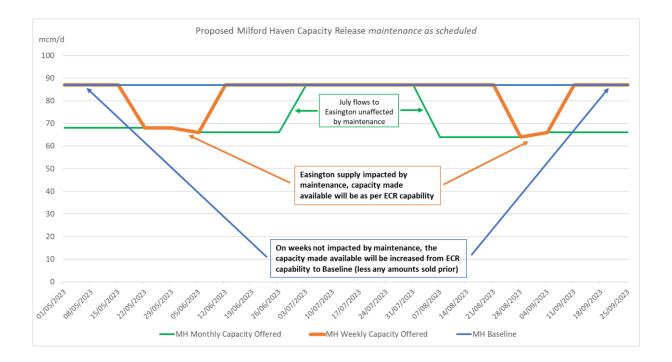
Amended solution

• Timing of capacity reductions

The comparison of Norwegian loss of supply against flows in the last couple of years indicates that the loss of Langeled supply will have greater impact on GB than the Vesterled outages. The loss in supply due to Vesterled outages will be less impactful and therefore the potential increase in LNG flows should have lesser impact on the constraint risk. Based on this, we have modified our original proposal to more closely align the quantity of entry capacity made available with the timeframes of likely Gassco Langeled impacting outages and releasing more entry capacity in weekly auctions in periods when only Vesterled outages have an impact on GB supply.



Based on the current Gassco maintenance plan as at 10/02/2023, the following chart outlines details of the new proposal, with the orange and green lines indicating the proposed level of capacity release in the monthly and weekly auctions respectively.



For clarity, the following table shows, based on the Gassco maintenance plan as at 10/02/2023, the entry capacity levels we would commit to release at Milford Haven. The Weekly auctions affected by Easington impacting Gassco outages have been highlighted. For a week spanning two months, the higher monthly capability number will be used to calculate the capacity offered in that weekly auction (to confirm, day ahead auctions will offer any capacity unsold in the weekly auctions, and within day auctions will then offer any capacity unsold at the day ahead stage.)



	Propo	sed Milford	Haven Capacity	Release (Sumi	mer 2023)	
Rolling Monthly (RMTnTSEC) Auctions effective	MH Capability mcm/d	Capacity offered mcm	Capacity offered kWh	Weekly Auction effective	Weekly capacity offered (mcm)*	Weekly capacity offered (kWh)*
1st May	68	68	748,000,000	1st May	87	957,000,000
				8th May	87	957,000,000
				15th May	68	748,000,000
				22nd May	68	748,000,000
1st Jun	66	66	726,000,000	29th May	68	748,000,000
				5th Jun	66	726,000,000
				12th Jun	87	957,000,000
				19th Jun	87	957,000,000
1st Jul	63	87	957,000,000	26th Jun	87	957,000,000
				3rd Jul	87	957,000,000
				10th Jul	87	957,000,000
				17th Jul	87	957,000,000
				24th Jul	87	957,000,000
1st Aug	64	64	704,000,000	31st Jul	87	957,000,000
				7th Aug	87	957,000,000
				14th Aug	87	957,000,000
				21st Aug	64	704,000,000
1st Sep	66	66	726,000,000	28th Aug	66	726,000,000
				4th Sep	66	726,000,000
				11th Sep	87	957,000,000
				18th Sep	87	957,000,000
				25th Sep	87	957,000,000

^{*}Weekly capacity offered will be reduced by quantities sold in Monthly NTS auctions

• Changes to maintenance schedule

We recognise that the Gassco maintenance schedule may be subject to change and clearly this lies outside of our control. To effectively mitigate the risk of constraints we believe that the capacity release should remain adaptable, in the event that the planned maintenance dates change i.e.

- In an instance of delay or cancellation of the scheduled maintenance period, auctions no longer affected by the maintenance will continue seeing entry capacity released up to baseline
- Those auctions originally not impacted but subsequently affected by the maintenance being moved or extended will see capacity reduced to the network capability level in line with principles detailed in the table above.

We recognise the industry need for certainty with regards to capacity release in the lead up to auctions. We will, therefore, have processes in place to monitor any changes to Gassco maintenance that (in the context of this proposal) could impact the release of NTS entry capacity, and we would communicate these to the industry (via ANS message) in a timely manner. In this approach we have tried to strike the right balance between ensuring the risk is managed effectively, but at the same time providing the industry with certainty as to what level



of entry capacity will be made available. Please see Appendix 2 for scenarios and further details.

In the consultation responses, as well as recent industry meetings, it has been suggested that the weekly auctions should be offered with longer lead time, or that the monthly auctions should be replaced with weekly auctions offered on monthly auction timeframes. Unfortunately, there are a number of reasons why we think this wouldn't be possible.

- UNC dictates how and when capacity is to be released in these auctions, therefore UNC change would be required.
- The quantity of capacity offered in weekly auctions is the unsold capacity from monthly auctions. Monthly auctions must complete (capacity must be allocated) for that to happen. Any changes to timings or quantities of capacity on offer would require Gemini system changes.
- Other system Users might be planning to purchase weekly capacity closer to the gas day to better align their purchase with planned flows. Equally, other Users (not directly impacted by this proposal) might be planning to purchase monthly capacity.

We commit to further explore this area with the industry in future engagement, but we think it is not feasible to make any changes applicable to auctions taking place from April 2023 onwards.

• Changes to the methodology text

Should this proposal be implemented, paragraph 74 of the Entry Capacity Release Methodology Statement would be replaced with the following:

74. Where, in respect of any given Gas Flow Day, circumstances arise in which National Gas foresees a capacity constraint occurring at an ASEP, National Gas may withhold capacity from sale for that ASEP in a DSEC auction. In all cases the quantity withheld will be limited to that which National Gas considers necessary to avoid the constraint or to avoid increasing the extent of the constraint, and hence to avoid, or limit, the cost of any actions needed to manage the constraint.

Furthermore, National Gas may also withhold capacity from RMTnTSEC, WSEC and DSEC auctions as contemplated in the ECR consultation letter in the period between 1st May 2023 to 30th September 2023 at the Milford Haven ASEP on the following basis:

- In a Rolling Monthly Trade and Transfer System Entry Capacity (RMTnTSEC) auction:
 - o Firm NTS Entry Capacity release will be reduced from the Licence Baseline Entry Capacity to network capability levels as contemplated in the ECR consultation letter



- (less any sold Firm NTS Entry Capacity) for auction periods where supply is affected by Gassco⁷ maintenance⁸
- o Should the maintenance be preponed, delayed, cancelled or extended from the dates contemplated in the ECR consultation letter and subject to National Gas
 Transmission having knowledge of this in sufficient time prior to the relevant auction opening, where Firm Entry Capacity was being released up to Licence Baseline Entry Capacity, but that period is now impacted by the changed maintenance programme, the Firm NTS Entry Capacity release will be reduced to network capability levels (less any sold Firm NTS Entry Capacity) for such auction period(s) and notice shall be provided by National Gas of such reduction prior to the relevant auction opening;
- o Should the maintenance be preponed, delayed, cancelled or extended from the dates contemplated in the ECR consultation letter and subject to National Gas Transmission having knowledge of this in sufficient time prior to the relevant auction opening, where Firm Entry Capacity was being released up to the network capability levels, but that period is now not impacted by the changed maintenance programme, the Firm NTS Entry Capacity will be released up to Licence Baseline Entry Capacity (less any sold Firm NTS Entry Capacity) for the auction period and notice shall be provided by National Gas of such increase.
- In a Weekly System Entry Capacity (WSEC) auction:
 - Firm NTS Entry Capacity will be reduced from Licence Baseline Entry Capacity to network capability levels as contemplated in the ECR consultation letter (less any sold Firm NTS Entry Capacity) for auction periods where supply is affected by Gassco maintenance
 - Should the maintenance be preponed, delayed, cancelled or extended from the dates contemplated in the ECR consultation letter and subject to National Gas
 Transmission having knowledge of this in sufficient time of preponement prior to the relevant auction opening, , where Firm Entry Capacity was being released up to Licence Baseline Entry Capacity, but that period is now impacted by the changed maintenance programme, the Firm NTS Entry Capacity release will be reduced to network capability levels (less any sold Firm NTS Entry Capacity) for such auction period and notice shall be provided by National Gas of such reduction;
 - Should the maintenance be preponed, delayed, cancelled or extended from the dates contemplated in the ECR consultation letter and subject to National Gas
 Transmission having knowledge of this in sufficient time prior to the relevant auction opening, where Firm Entry Capacity was being released up to the network capability levels, but that period is now not impacted by the changed maintenance programme, the Firm NTS Entry Capacity will be released up to Licence Baseline Entry Capacity (less any sold Firm NTS Entry Capacity) for the auction period and notice shall be provided by National Gas of such increase.
- In Daily System Entry Capacity (DSEC) auctions:

⁷ Gassco AS, the Norwegian operator for the integrated system for transporting gas from the Norwegian continental shelf to other EU countries

⁸ For clarity, relating to maintenance by Gassco with potential Easington impacts only i.e., where affected assets are Nyhamna and Kollsnes as per Gassco maintenance website



- Firm NTS Entry Capacity will be released up to Licence Baseline Entry Capacity (less any sold NTS Entry Capacity) for the days where supply is not affected by Gassco maintenance
- Firm NTS Entry Capacity will be reduced from Licence Baseline Entry Capacity to network capability levels for the days affected by Gassco maintenance
- In instances when the weekly and day ahead capability assessment indicates a higher capability, then National Gas will release Firm NTS Entry Capacity up to the higher capability level (less any NTS Entry Capacity), for days affected by Gassco maintenance
- In all cases, any additional capacity released due to higher week ahead and/or day ahead assessments will be limited to a level which National Gas considers will not introduce any undue constraint risk or associated cost exposure for customers.

The average summer 2022 LNG flows circa doubled compared to the summer 2021 average flows, although for the most part flows did not exceed the capability of the network by some margin. We anticipate that geopolitical situation will continue to impact gas flows although we have no visibility of summer 2023 predicted Milford Haven flows, and no certainty of how impactful the Norwegian maintenance periods will be to either GB supplies or wider market dynamics. It is therefore very challenging to assess the likelihood of LNG flows exceeding network capability, and the level of associated constraint costs that may materialise. We do believe however, that the Milford Haven entry capacity reduction should be applicable during periods of Gassco maintenance (impacting Easington supplies), to effectively protect customers and end consumers from the risk of high constraint costs.

In their consultation response South Hook Gas stated that they "...estimate the likely send out from the Dragon LNG terminal and seek to schedule our deliveries in a way that avoids NTS constraints." We greatly appreciate both the openness of, and sincerity, behind this statement, and take assurance from this as desire to act as a prudent operator into summer 2023.

We recognise the criticality of our role in ensuring the GB and European gas industry functions in an efficient and effective manner whilst meeting customer requirements. We are working as a priority to ensure we can continue to maximise gas flows into and out of our network, to the extent that we are able. In our view our amended proposal, if implemented, would successfully mitigate the risk of potential constraints at times where we see them most likely to occur, but at the same time, we think that by releasing full baseline capacity for the majority of the summer we would better facilitate LNG Shippers and Operators to maximise utilisation of existing capacity and capability of the NTS.

It is worth noting that in the previous consultation on the proposed capacity reductions at the Milford Haven ASEP the industry raised several concerns which we tried to address in NGG's Joint Response to ECR consultation. This letter should therefore be read in conjunction with that document, a copy of which can be found on our website⁹.

⁹ https://www.nationalgas.com/gas-transmission/document/141801/download



The Methodology statements can be found on our website: https://www.nationalgas.com/gas-transmission/capacity/capacity-methodology-statements

- To assist in reviewing the proposed changes to the ECR Methodology Statement, a comparison of the current document version 7.0 to version 7.3 is available on our website (please go to Entry Capacity Release (ECR) section and '2023 annual review' folder).
- To assist in reviewing the proposed changes to the ECS Methodology Statement, a comparison of the current document version 11 to version 11.1 is available on our website (please go to Entry capacity substitution (ECS) section and '2023 annual review' folder).
- To assist in reviewing the proposed changes to the ExCS Methodology Statement, a comparison of the current document version 9.0 to version 9.1 is available on our website (please go to Exit capacity substitution and revision (ExCS) section and '2023 annual review' folder).
- To assist in reviewing the proposed changes to the ECTT Methodology Statement, a comparison of the current document version 11.0 to version 11.1 is available on our website (please go to Entry capacity transfer and trade (ECTT) section and '2023 annual review' folder).

We would appreciate the comments of all interested parties on the proposed changes to the capacity statements. Responses should arrive at National Gas Transmission by 17:00 on Monday 13th March 2023 and be sent by e-mail to: box.gsoconsultations@nationalgrid.com.

Responses will be placed on our website and incorporated within the consultation conclusions report. If you wish your response to be treated as confidential, then please mark it clearly to that effect.

Your sincerely

Chris Logue
Head of Markets



Appendix 1 Calculation of Constraint Management Costs

Scenario 1 is the original scenario (included in the consultation letter issued on 9th December 2022).

Scenario 2 includes updated locational buy and sell prices, using the average differential from SAP observed on 18th January 2023, when locational actions were taken at MH to manage an entry constraint.

This is the most up to date information we have and as such, should reflect the current market conditions (accepting that this was not a summer constraint). This data indicates that bids accepted were sold at the average 61% of SAP on the day (as opposed to the assumption of 76%) and locational buy actions were 45% higher than SAP (as opposed to 37% in the previous calculation). The updated figures add £3m to our calculation of the potential day 1 constraint costs.

Scenarios 3/4/5/6 capture the costs based on the following assumptions:

- We have updated the locational sell and buy prices as per scenario 2
- In addition to 87mcm/d flows, we have utilised flows of 79mcm/d and 71mcm/d to generate different constraint volumes to demonstrate how the costs would change depending on the severity of the constraint
- We have used 350p/th and 173p/th as prices to demonstrate how the costs would change depending on the prevailing price on the day. At the time of issuing our original proposal the gas price was 350p/th. The May 2023 forward gas price as at 23/1/23 was 173p/th.

	Unit	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Capability	mcm/d	65	65	65	65	65	65
Flow	mcm/d	87	87	79	79	71	71
Constrained vol	mcm	22	22	14	14	6	6
Gas price	p/th	350	350	350	173	350	173
Locational sell	p/th	266	217	217	107	217	107
Locational buy	p/th	480	511	511	253	511	253
Buy Back	p/th	525	525	525	260	525	260
				Tota	l costs		
Locational Sell (50%)	£	10,982,322	8,959,262	5,701,349	2,818,095	2,443,435	1,207,755
Locational Buy (25%)	£	9,898,540	10,548,809	6,712,878	3,318,080	2,876,948	1,422,034
Buyback (50%)	£	21,675,635	21,675,635	13,793,586	6,817,972	5,911,537	2,921,988
		Total costs					
Day 1 cost	£	20,591,853	23,265,181	14,805,115	7,317,957	6,345,049	3,136,267

N.B Day 1 cost = (constraint volume * (50/25)%) * locational offer/bid price /100

Based on the figures detailed above the daily cost could vary between £23m to £3.1m.

Scenarios 7/8/9/10 indicate the potential level of constraint costs in instances where locational actions only are executed to manage the constraint i.e. 100% of the constraint volume was covered by locational sell actions (requesting supply turn down at the Milford Haven terminal or demand upturn from gas users in the Milford Haven area). Within these scenarios we have maintained the assumption that half of the constraint quantity would need to be purchased through locational buy trades (in other areas of the network to help maintain the overall network balance).



	Scenario 7	Scenario 8	Scenario 9	Scenario 10		
Capability	65	65	65	65		
Flow	79	79	71	71		
Constrained vol	14	14	6	6		
Gas price	350	173	350	173		
Locational sell	217	107	217	107		
Locational buy	363	253	363	253		
Buy Back	-	-	-	-		
	Total costs					
Locational Sell(100%)	11,402,698	5,636,191	4,886,870	2,415,510		
Locational Buy (50%)	13,425,757	6,647,195	5,753,896	2,848,798		
Buyback	-	-	-	-		
	Total costs					
Day 1 cost	2,023,059	1,011,004	867,025	433,287		

Scenarios 7 and 8 calculate a daily constraint cost on flows of 79mcm, where the constraint volume of 14mcm is sold in locational sell actions at the gas prices of £350p/th and 173p/th. Half of the constraint volume (7mcm) needs to be purchase via locational buy actions. In such scenario the day 1 cost would be £2m and £1m respectively. If the constraint volume decreases (scenarios 9 and 10), so does the daily cost. In the case of an enduring constraint across multiple days and as such, prices may also increase, the total cost of constraint could still be high.



Appendix 2

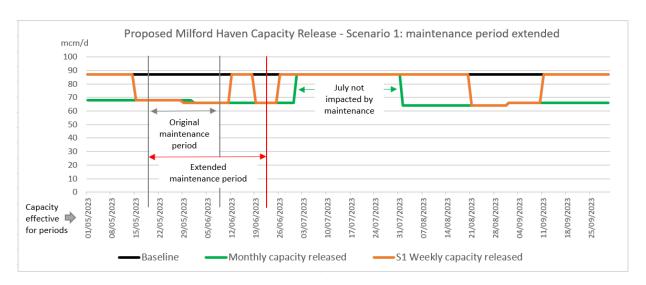
Scenarios illustrating capacity release if changes to maintenance schedule

In this section we have illustrated scenarios in which the Norwegian maintenance period is extended (Scenario 1) or moved (Scenario 2), and for each explained how the proposed approach would accommodate this in terms of adjustments to available capacity. It should be noted that the scenarios chosen are purely for illustrative purposes, and there are many other scenarios that may unfold.

The objective of this section is to show how, subject to having knowledge of this in sufficient time, the monthly and weekly capacity release would be adjusted in auctions to reflect periods either no longer impacted, or newly impacted, by a change to the current maintenance schedule. The principle of fixing weekly auction capacity released a few days prior to the auction being held would also apply to the monthly auction capacity released (e.g., capacity released in the June RMTnTSEC auction held on 11th May would not be adjusted after 9th May).

Scenario 1 – maintenance period extended

Original impacted dates: 19th May – 9th June New impacted dates: 19th May – 23rd June



Assumptions:

- Knowledge of maintenance extension gained on 5th June; industry notified via ANS 6th June.
- Monthly auction (RMTnTSEC) had offered reduced capacity of 66 mcm/d, and 0 mcm/d sold.

Weekly (WSEC) auctions would release capacity as follows:



	Capacity e	ffective for			
	Start date (Monday)	End date (Sunday)	WSEC auction held on	Capacity release fixed on	WSEC capacity released (mcm/d)
	15/05/2023	21/05/2023	05/05/2023	03/05/2023	68
	22/05/2023	28/05/2023	12/05/2023	10/05/2023	68
	29/05/2023	04/06/2023	19/05/2023	17/05/2023	68
	05/06/2023	11/06/2023	26/05/2023	24/05/2023	68
	12/06/2023	18/06/2023	02/06/2023	31/05/2023	87
7	19/06/2023	25/06/2023	09/06/2023	07/06/2023	66
	26/06/2023	02/07/2023	16/06/2023	14/06/2023	87
	03/07/2023	09/07/2023	23/06/2023	21/06/2023	87

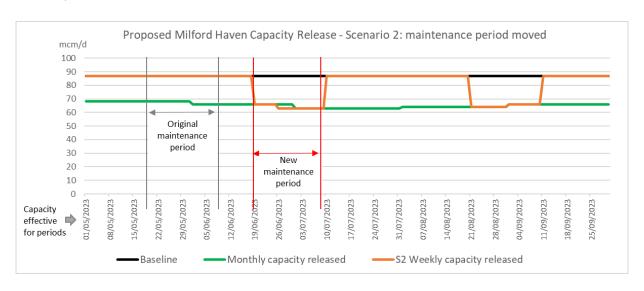
Weeks impacted by maintenance extension

Notes:

- If capacity had been sold in the monthly auction, the weekly amount released would be reduced by this amount.
- For gas days 12th 18th June, had maintenance notification been received prior to 31st May, the capacity released would have also been reduced in this auction (66 mcm/d).
- If day ahead assessments determine that capability is lower than Baseline for gas days $12^{th} 18^{th}$ June, reduced capacity will be released in the day ahead auctions, though not less than 66 mcm/d.
- If day ahead assessments determine that capability is higher than 66 mcm/d for gas days 19th – 25th June, additional capacity will be released in the day ahead auction, up to a level which National Gas considers will not introduce any undue constraint risk or associated cost exposure for customers.

Scenario 2 – maintenance period moved

Original impacted dates: 19th May – 9th June New impacted dates: 19th June – 9th July





Assumptions:

- Knowledge of maintenance moving gained 16th May, industry notified via ANS 17th May.
- Monthly auction (RMTnTSEC) had offered reduced capacity of 66 mcm/d for May, and 0 mcm/d sold.

Weekly (WSEC) auctions would release capacity as follows:

	Capacity effective for				
	Start date (Monday)	End date (Sunday)	WSEC auction held on	Capacity release fixed on	WSEC capacity released (mcm/d)
	15/05/2023	21/05/2023	05/05/2023	03/05/2023	68
	22/05/2023	28/05/2023	12/05/2023	10/05/2023	68
Market and Indiana Consider	29/05/2023	04/06/2023	19/05/2023	17/05/2023	87
Weeks no longer impacted by maintenance moving	05/06/2023	11/06/2023	26/05/2023	24/05/2023	87
by maintenance moving "	12/06/2023	18/06/2023	02/06/2023	31/05/2023	87
Maria Communication	19/06/2023	25/06/2023	09/06/2023	07/06/2023	66
Weeks impacted by maintenance moving	26/06/2023	02/07/2023	16/06/2023	14/06/2023	63
manitenance moving	03/07/2023	09/07/2023	23/06/2023	21/06/2023	63
	10/07/2023	16/07/2023	30/06/2023	28/06/2023	87
	17/07/2023	23/07/2023	07/07/2023	05/07/2023	87
	24/07/2023	30/07/2023	14/07/2023	12/07/2023	87
	31/07/2023	06/08/2023	21/07/2023	19/07/2023	87

Notes:

- If capacity had been sold in the monthly auctions, the weekly amounts released would be reduced by this amount.
- The RMTnTSEC auction releasing capacity for June is held on 11th May, therefore in this example, knowledge of the maintenance moving is after the point at which capacity release can be adjusted.
- The RMTnTSEC auction releasing capacity for July is held on 9th June, therefore in this example, capacity released is adjusted to reflect that July is now impacted by the moved maintenance.
- For gas days 29th May 18th June which are no longer impacted by maintenance, Baseline capacity would be released in the WSEC auctions.
- For gas days 19th June 9th July, if day ahead assessments determine that capability is higher than that released in the WSEC auction, additional capacity will be released in the day ahead auction, up to a level which National Gas considers will not introduce any undue constraint risk or associated cost exposure for customers.