

Gas Transportation Transmission Planning Code

nationalgrid

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About this document

National Grid owns and operates the National Transmission System (NTS), the high pressure natural gas transportation system in Great Britain. It has a duty to plan and develop the system in an economic and efficient manner. This document describes how long term supply and demand [scenarios](#) are used to develop the investment proposals published in National Grid's Ten Year Statement.

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This document is part of a suite of documents that describe how the NTS is planned and developed over the long term and how capacity is released to users of the system. These documents may be obtained from National Grid [NTS](#) at our website¹.

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<http://www.nationalgrid.com/Gas/>.

This statement of the Transmission Planning Code is effective from 1st October 2012.

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Further information about the information contained in this document may be obtained from our Network Design team at:

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Or by e-mail at: ntsinvestment@nationalgrid.com

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¹ <http://www.nationalgrid.com/uk/Gas/TYS/>

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Contents

- 1 Introduction..... 1
- 1.1 Document Scope..... 1
- 1.2 Document Structure..... 1
- 2 Legislative Framework..... 2
- 2.1 Gas Act 1986 (as amended)..... 2
- 2.2 National Grid’s Gas Transporter Licence in respect of the NTS..... 2
- 2.3 Pipelines Safety Regulations 1996..... 3
- 2.4 Pressure Systems Safety Regulations 2000 5
- 2.5 Gas Safety (Management) Regulations 1996..... 5
- 2.6 Planning Regime 6
- 2.7 Environmental Impact Assessment Directive 9
- 2.8 Emissions 10
- 2.9 Large Combustion Plant Directive (LCPD) 2001 11
- 2.10 Industrial Emissions Directive..... 12
- 2.11 European Union Third Package..... 13
- 3 Policy and Guidelines for NTS Planning 16
- 3.1 Industry Standards and Guidelines..... 16
- 3.2 National Grid Policies 16
- 4 Investment Planning..... 18
- 4.1 Future Energy Scenario Consultation..... 18
- 4.2 Planning Cycle..... 18
- 4.3 Ten Year Statement 20
- 4.4 New Projects Requiring Entry or Exit Capacity..... 20
- 4.5 Operational Analysis..... 23
- 5 Supply 24
- 5.1 Long Term Supply Scenarios 24
- 5.2 Supply Scenario Updates 26
- 6 Demand..... 27

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- [6.1 Long Term Demand Scenarios..... 27](#)
- [6.2 Demand Scenarios 27](#)
- [6.3 Offtake Capacity Statements, Offtake Pressure Statements and Long Term Planning Information 28](#)
- [7 Entry Capacity 29](#)
- [7.1 Long Term System Entry Capacity Auctions 29](#)
- [7.2 Development of Supply and Demand Scenarios 29](#)
- [7.3 Network Capability Analysis for Entry Capacity 29](#)
- [7.4 Investment Planning Analysis for Entry Capacity 30](#)
- [7.5 Analysis of Long Term System Entry Capacity Auction Signals 30](#)
- [8 Exit Capacity 33](#)
- [8.1 Long Term Exit Capacity Bookings..... 33](#)
- [8.2 Development of Supply and Demand Scenarios 33](#)
- [8.3 Network Capability Analysis for Exit Capacity 34](#)
- [8.4 Investment Planning Analysis for Exit Capacity 34](#)
- [9 Network Analysis 37](#)
- [9.1 Basis of Network Analysis Models 37](#)
- [9.2 Analysis Assumptions..... 37](#)
- [9.3 Steady State Analysis..... 38](#)
- [9.4 Transient Analysis 38](#)
- [9.5 Design Margin 38](#)
- [9.6 Supply Flows 41](#)
- [9.7 Demand Flows..... 41](#)
- [9.8 Storage and Interconnector Flows..... 41](#)
- [9.9 Ramp Rates 42](#)
- [9.10 Maximum Entry and Exit Flows 42](#)
- [9.11 Standard Volumetric Flows..... 42](#)
- [9.12 Entry and Exit Pressures 43](#)
- [9.13 Compressors 45](#)
- [9.14 Regulators 48](#)
- [9.15 Multi-junctions..... 48](#)
- [9.16 Gas Quality and Temperatures 49](#)
- [9.17 Reinforcement Projects 49](#)
- [9.18 Optimal Reinforcement..... 52](#)

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9.19 Alternatives to Investment Projects 54

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Appendices

[Appendix A: Glossary 58](#)
[Appendix B: References 65](#)
[Appendix C: Document Revision History..... 66](#)

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<#> References . 53¶
<#> Document Revision History . 54¶

Chapter One

Introduction

1.1 Document Scope

The National Transmission System (NTS) is the high pressure natural gas transportation system in Great Britain designed to operate at pressures of up to 94 bar(g). Gas is transported through steel pipelines from coastal reception terminals and storage facilities to large consumers (such as power stations and industrial sites), storage facilities and distribution networks connected to the system.

National Grid owns and operates the NTS. It has a duty to plan and develop the system in an economic and efficient manner. This document describes National Grid's approach to planning and developing the NTS in accordance with its duties as a Gas Transporter and other statutory obligations relating to safety and environmental matters, and is published in accordance with Special Condition C11 of National Grid's Gas Transporter Licence in respect of the NTS.

Special Condition C11 requires that National Grid maintains a Transmission Planning Code that describes the methodology used to determine the physical capability of the system, to inform parties wishing to connect to and use the NTS, of the key factors affecting the planning and development of the system.

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National Grid must comply with the Transmission Planning Code in planning and developing the NTS. National Grid must also review the Transmission Planning Code at least every two years, after consultation with the gas industry. Modifications to this code must be approved by the Gas and Electricity Markets Authority (GEMA) before they may be implemented.

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1.2 Document Structure

This document is structured in several chapters as explained below:

Chapters 2 and 3 describe the legislative framework, policies and guidelines in place that have a direct bearing on the planning of the NTS and lead times for investment.

Chapter 4 provides a high level overview of the Planning Cycle.

Chapters 5 and 6 describe the supply and demand assumptions used for planning.

Chapters 7 and 8 describe the commercial entry and exit capacity release processes and their effect on investment planning decisions.

Chapter 9 describes the assumptions used for planning analysis.

Chapter Two

Legislative Framework

National Grid is required to comply with certain legal requirements in the planning and development of the National Transmission System (NTS) in Great Britain. The key legislation affecting network planning and lead times for investment is described below. For clarity, "National Grid NTS" is used where National Grid is undertaking its duties in respect of the NTS.

2.1 Gas Act 1986 (as amended)

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The Gas Act is the primary UK legislation that governs the transport and supply of natural gas within Great Britain. National Grid holds Gas Transporter Licences in respect of its gas transportation activities for the NTS and the four retained distribution network businesses. These licences are granted and administered by the Gas and Electricity Markets Authority ("the Authority"), established by the Utilities Act 2000.

Section 9 of the Gas Act states a Gas Transporter has general duties in the planning and development of their system, which are:

- " (a) To develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and
- (b) Subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him –
 - (i) To connect to that system, and convey gas by means of that system to, any premises, or
 - (ii) To connect to that system a pipe-line system operated by an authorised transporter."

2.2 National Grid's Gas Transporter Licence in respect of the NTS

National Grid is bound by the terms of its Gas Transporter Licence ("the Licence") in respect of the NTS. This contains a number of Standard, Standard Special and Special Conditions that National Grid must abide by in developing and operating the network and in conducting its transportation business. The licence obligations that are relevant to the planning and development of the NTS are described below.

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2.2.1 Standard Special Condition A9: Pipe-Line System Security Standards

This condition sets out the security standard for the NTS. It requires that National Grid NTS plan the system to meet the 1-in-20 peak aggregate daily demand, including but not limited to, within day gas flow variations on that day.

The condition states that the 1-in-20 peak demand level should be calculated to include the load reduction through interruption or for contractual reasons and requires that historic data from at least the 50 previous years should be used when identifying the 1-in-20 peak day.

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2.2.2 Special Condition C2: Long Term Development Statement

Under this obligation, National Grid must publish an annual Long Term Development Statement for the NTS that sets out the likely use of the NTS, and the likely developments of the NTS, any other facilities or pipeline systems that may affect the connection charging and transportation charging arrangements over the next ten years. National Grid NTS publishes the Ten Year Statement (TYS) each year in accordance with this condition and the Uniform Network Code Transportation Principal Document (UNC TPD) Section O after consultation with the gas industry through the Transporting Britain's Energy process.

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2.2.3 Special Condition C8D: NTS gas entry incentives, costs and revenues

The NTS entry condition sets out the entry capacity incentive arrangements that National Grid NTS operate under, the obligations on National Grid NTS to offer entry capacity for sale, the levels of entry capacity that must be offered for sale, and the process for increasing the levels of entry capacity that must be offered for sale.

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The details of the Entry Capacity release process are set out in Section B of the UNC and the Incremental Entry Capacity Release (IECR) Methodology Statement. National Grid can only permanently increase the level of entry capacity at an Aggregated System Entry Point (ASEP) having first assessed how much entry capacity may be substituted to meet the increase as a result of applying its Entry Capacity Substitution Methodology.

The condition describes two incentive mechanisms that incentivise National Grid NTS to manage its lead times for releasing additional entry capacity.

2.2.4 Special Condition C8E: NTS gas exit incentives, costs and revenues

The NTS exit condition sets out similar requirements to that for entry capacity. Under the enduring exit arrangements there is an incentive for National Grid NTS to manage its lead times for releasing additional exit capacity.

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The details of the Exit Capacity release process are set out in Section B of the UNC and the NTS Exit Capacity Release Methodology Statement. National Grid NTS can only permanently increase the level of exit capacity at an Exit Point having first assessed how much exit capacity may be substituted to meet the increase as a result of applying its Exit Capacity Substitution Methodology.

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2.3 Pipelines Safety Regulations 1996

The Pipelines Safety Regulations (PSR) 1996 were made under the Health and Safety at Work Act 1974. These Regulations are the principal health and safety legislation in the UK concerning the safety and integrity of pipelines, and are regulated by the Health and Safety Executive (HSE). They apply to all relevant onshore UK pipelines to ensure that these pipelines are designed, constructed, operated, maintained and decommissioned safely. In particular they class certain pipelines that transport certain "dangerous fluids" as Major Accident Hazard Pipelines (MAHPs). All natural gas pipelines operating above 7 bar(g) fall into this category.

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PSR covers four areas:

1. [Pipeline design](#)
2. [Pipeline safety systems](#)
3. [Pipeline construction and installation](#)
4. [Examination and maintenance](#)

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[Operators of MAHPs are required to notify the HSE before construction, use and modification of the pipelines.](#)

[The Regulations require that construction of a new MAHP must not start until the operator has notified HSE at least six months prior to the start of construction \(of the first stage of construction\), although in practice the HSE are involved in discussions on the design and routing of the pipeline ahead of this notification period. Notification of at least 3 months is also required in other cases, for example in advance of](#)

- [Major modifications or remedial work to the pipeline.](#)
- [Changes in safe operating limits e.g. pressure uprating](#)
- [Changes in fluid composition or type as this may have an effect on pipeline integrity](#)
- [End of use of a pipeline \(decommissioning and dismantling\)](#)
- [Changes in pipeline materials and equipment](#)
- [Re-routing of pipelines](#)

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[PSR further require that a pipeline operator has adequate arrangements in place to deal with an accidental loss of fluid from a pipeline, defects and damage to a pipeline or any other emergency affecting the pipeline. Operators of MAHPs must also have adequate emergency procedures, an appropriate organisation and effective arrangements in place to deal with an emergency involving a MAHP. Since pipelines may typically span large areas of the country, this requires the pipeline operator to liaise with local authorities along the route of the pipeline to ensure that they also have suitable emergency procedures in place to meet their obligations under PSR.](#)

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2.4 Pressure Systems Safety Regulations 2000

The Pressure Systems Safety Regulations (PSSR) 2000 aim to prevent serious injury from the hazard of stored energy as a result of the failure of a pressure system or one of its component parts.

The Regulations require owners of pressure systems to demonstrate that they:

- Have designed and constructed the pressure system to be safe with the appropriate protective devices where required;
- Have established the safe operating limits of pressure systems;
- Have a written scheme of examination in place prior to the use of the system; and
- Maintain and repair the system to meet the required safety standards.

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The written scheme of examination certifies the pressure system (including all protective devices, pressure vessels and pipework) for use and must be approved by a competent (independent) person. Examinations must be carried out by a competent person and must be reviewed at regular intervals as defined by the written scheme. The system must also be maintained properly to ensure that it is safe.

The main protective devices for the NTS are compressor stations, pressure reduction installations and boundary control systems.

2.5 Gas Safety (Management) Regulations 1996

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The Gas Safety (Management) Regulations (GSMR) 1996 require each Gas Transporter to prepare a Safety Case document that sets out in detail the arrangements in place in four main areas:

1. The safe management of gas flows through the network, particularly those parts of the network supplying domestic consumers
2. The management of gas supply emergencies², including those measures in place to minimise the risk of a gas supply emergency occurring
3. The management of reported gas escapes and gas incidents
4. The management of gas quality and composition within safe parameters

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Schedule 1 of GSMR describes the scope of the Safety Case. In particular, Schedule 1 states that the Safety Case must contain

“17. Particulars to demonstrate that the duty holder has established adequate arrangements to ensure that the gas he conveys will be at an adequate pressure when it leaves the part of the network used by him.”

² The Gas Safety (Management) Regulations 1996 define a gas supply emergency as being an ‘emergency endangering persons and arising from the loss of pressure in a network...’. The definition of danger is limited to risks from the gas itself.

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The Safety Case must be formally accepted by the HSE. Once accepted, there is a legal obligation on the Gas Transporter to comply with its Safety Case. Any changes to safety management systems, key technical policies and procedures concerning gas supply emergencies, staff resource levels, system operation changes, organisational changes or changes to commercial arrangements may require a material Safety Case revision. Such revisions will need approval by the HSE before they may be implemented.

National Grid Gas's Safety Case contains a section (Section 17: Adequate Network Pressure) that is relevant to the planning and development of the NTS to ensure that adequate pressure is maintained within the network under a range of operating conditions. This section of the Safety Case outlines the guidance documents used in the planning of the NTS (which are also described later in this document) and the use of validated network analysis models for planning (which is expanded upon in this document).

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2.6 Planning Regime

National Grid has legislative obligations relating to consent authorisations required when developing elements of the NTS in the form of:

- [Planning Act 2008](#)
- [Town and Country Planning Act 1990](#)

Generally speaking the Planning Act 2008 will apply to the construction of NTS pipelines whereas the Town and Country Planning Act 1990 will apply to the provision of fixed assets such as Compressor Stations and Pressure Reduction Installations.

2.6.1 Planning Act 2008

The Planning Act 2008 (as amended) introduced changes to streamline the planning system by establishing a single consenting regime. Following changes introduced through the Localism Act 2011, the Planning Inspectorate replaced the Infrastructure Planning Commission (IPC), with Nationally Significant Infrastructure Project (NSIP) applications being determined by the relevant Secretary of State. Six energy related National Policy Statements (NPSs) have been produced by the Department of Energy and Climate Change, which were designated in July 2011. They set out the national policy framework for the development of energy infrastructure, and provide the primary basis for decision making.

The Planning Act does not apply in Scotland, and does not apply to gas transporter pipelines in Wales. In these Countries gas transporter pipelines are installed under permitted development rights by virtue of the Gas Act 1995 (as amended). In response to the requirements of the Planning Act and the impending review of planning requirements in Wales, National Grid NTS has developed a consistent approach for developing major infrastructure projects to be applied consistently across England, Wales and Scotland.

2.6.2 Nationally Significant Infrastructure Projects

The construction of a gas transporter pipeline is considered to be a NSIP when each of the following conditions are met:

1. The pipeline must be wholly or partly in England and either:

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- a. the pipeline must be more than 800mm in diameter and more than 40km in length, or
 - b. the construction of the pipeline must be likely to have a significant effect on the environment; and
2. The pipeline must have a design operating pressure of more than 7 bar gauge; and
 3. The pipeline must convey gas for supply (directly or indirectly) to at least 50,000 customers, or potential customers, or one or more gas suppliers.

Gas transporter pipelines (including new pipelines and diversions) that are less than 800mm in diameter and 40km in length are only considered NSIP developments if the construction is likely to have a significant effect on the environment. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (see below) provide a 'screening' mechanism to establish whether the proposed works are likely to have a significant effect on the environment.

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In England, works associated with a NSIP may be included within the Development Consent Order (DCO) application to be determined by the Secretary of State for Energy and Climate Change.

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2.6.3 Impact of the Planning Act

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The Planning Act requires pre-application consultation and engagement with affected and interested parties during the development of the project. As previously mentioned, in response to these requirements, National Grid has developed an approach⁴ for developing major infrastructure projects which sets out in a transparent way the stages of project development and when during the process relevant stakeholders are consulted. National Grid NTS has developed a generic timeline to illustrate the various stages in the project development process (see diagram below).

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This approach includes greater documentation of network analysis, project optioneering, engineering design activity and wider consultation with stakeholders than in previous planning regimes. This increases the time required to complete the overall process, but means that stakeholders' views are incorporated earlier, improving the certainty of the outcome. However, this new regime does not affect the actual build time to deliver new infrastructure, which will remain largely unchanged (subject to consent conditions, terrain and weather).

Deleted: This new planning regime does not affect the actual build time to deliver new infrastructure, which will remain largely unchanged (subject to consent conditions, terrain and weather), however, the front end, pre-planning application process has changed significantly. This stage now includes a greater level of network analysis, project optioneering, engineering design activity and wider consultation with stakeholders than in previous planning regimes. This increases the time required to complete the overall process, but means that stakeholders' views are incorporated earlier, improving the certainty of the outcome.¶

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⁴ National Grid's approach for electricity projects is set out in the link below. A similar document is being prepared for gas projects.

<http://www.nationalgrid.com/uk/Electricity/UndergroundingConsultation/ApproachToDesignAndRouteingOfNewLines/>

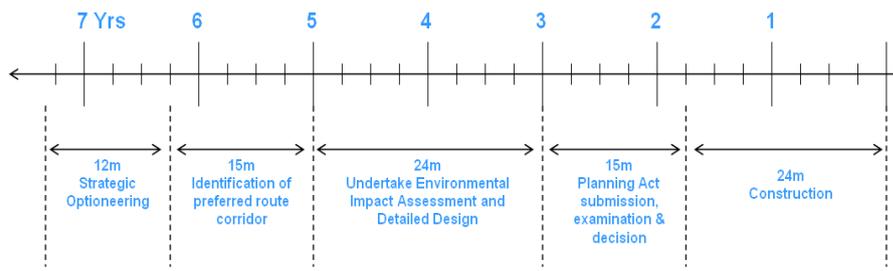
Deleted: .National Grid has developed a generic timeline, to illustrate its understanding of the process steps leading up to a submission to the Planning Inspectorate (see diagram below).

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As illustrated in the diagram above, the overall planning process is anticipated to take up to 7 years (84 months). The current default lead time, from the receipt of a formal capacity signal to the release of incremental entry capacity, is defined in National Grid's Gas Transporters Licence and as this is shorter than the Planning Act timeline, a significant quantity of the pre-application phase works and stakeholder consultation would need to be completed ahead of a formal signal for capacity in order that system reinforcement can be delivered in time for the release of the capacity⁵.

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As National Grid NTS currently has limited experience of progressing gas pipeline projects through the new planning regime, the timeline quoted above is considered to be generic. It is based on experience from other applications under the Planning Act, guidance on the Government's expectations on pre-application consultation and extensive discussions with a wide range of relevant stakeholders. We consider it to be representative of the timeline for a typical major linear infrastructure project however, this timeline is not fixed and will vary on a case by case basis according to each project's individual requirements. We recognise that there are concerns amongst some industry participants regarding these timescales and we are working with the Department of Energy and Climate Change (DECC) and the Department for Communities and Local Government (DCLG) to understand the full implications - as are other industry stakeholders. Notwithstanding the outcome of these on-going discussions, National Grid NTS will endeavour to improve upon these timescales wherever it is possible to do so and by learning lessons from other major projects under the Planning Act whilst maintaining the required quality of consultation and engagement necessary to ensure compliance with the Planning Act.

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2.6.4 Town and Country Planning Act 1990

The Town and Country Planning Act 1990 is the land use planning system framework used to maintain a balance between economic development and environmental quality. Each country in the United Kingdom has its own distinct planning system with responsibility for town and country planning devolved to the Welsh Assembly and the Scottish Parliament.

Due cognisance has to be given to the Town and Country Planning Act for the provision of fixed assets such as Compressor Stations and Pressure Reduction Installations. So in order to develop a fixed asset, National Grid is required to apply for planning permission from the relevant local planning authority. Timescales for gaining planning approval for a development vary depending on the type, size, location and sensitivity of a particular development.

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⁵ Regulatory changes through RIIO and commercial changes through UNC are being progressed to address this issue

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In the event that planning permission is refused, an appeal can be submitted within 6 months to the Secretary of State for Communities and Local Government in England and Wales, or the First Minister in Scotland. A Planning Inspector or Scottish Reporter would be appointed to hear the appeal, which may be in the form of written representations, hearing or inquiry. The time from submission of appeal to receipt of a decision depends on the size, scale and complexity of the project and the reasons for refusal, and the type of appeal held. For more complex appeals an inquiry may be held, with approximately half of decisions reached within 26 weeks.⁶

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The timescales for gaining planning approval for a development are indeterminate as they are dependent on the type, size and sensitivity of a particular development and are not defined in the legislation.

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2.7 Environmental Impact Assessment Directive

The Environment Impact Assessment Directive (2011/92/EU) requires Environmental Impact Assessments to be conducted before development consent is granted, for certain types of major public and private projects which are judged likely to have significant environmental effects.

An Environmental Impact Assessment examines in a comprehensive, detailed and systematic manner, the existing environment (natural, physical and built) and the proposed pipeline development. This typically requires the completion of a wide range of searches, studies and surveys over four seasons which takes a minimum of 12 months to complete. The Environmental Statement is the culmination of this assessment, and sets out the environmental baseline, the likely significant environmental effects, proposed mitigation measures and any residual effects from the proposed development. The Environmental Statement will also include National Grid's commitments⁹ to minimising the effects on the environment.

2.7.1 Infrastructure Planning (Environmental Impact Assessment) Regulations 2009

In England, gas transporter pipeline works that fall within Annex I, or Annex II of the Directive by virtue of their likely significant environmental effects, require an Environmental Statement to accompany an application for development consent to the Secretary of State for Energy and Climate Change under the Planning Act 2008. These works are classed as NSIPs. From submission of the application to the Planning Inspectorate to obtaining a decision from the Secretary of State may take up to 15 months.

⁶ Planning Portal: appeal handling times:
<http://www.planningportal.gov.uk/planning/appeals/guidance/handlingtimes>

⁹ National Grid's Stakeholder, Community and Amenity Policy

2.7.2 The Public Gas Transporter Pipe-line Works (Environmental Impact Assessment) Regulations 1999

These Regulations apply to gas transporter pipeline works in Wales, Scotland and England. In Wales and Scotland, pipeline works in Annex I of the Directive require an Environmental Statement to be submitted to the Secretary of State for Energy and Climate Change (DECC). For pipeline works in Annex II of the Directive 'the works' may be subject to an Environmental Impact Assessment if they have a design operating pressure exceeding 7 bar(g) or either wholly or in part cross a sensitive or scheduled area. In these circumstances, the Gas Transporter must, before commencing construction, either obtain determination from the Secretary of State that an Environmental Statement is not required, or give notice that it intends to produce an Environmental Statement. The Regulations also provide for the Secretary of State to require an Environmental Statement where proposed works in Wales and Scotland do not meet these criteria but nevertheless it is considered that there are likely to be significant environmental effects. The completed Environmental Statement is submitted to the Department for Energy and Climate Change (DECC). It normally takes DECC between 9 to 12 months to review the Environmental Statement, complete the consultations required with all appropriate statutory and non statutory parties and grant the development consent required.

In England, gas transporter pipelines works that fall within Annex I or II would require an Environmental Statement to be produced and would be an NSIP project requiring development consent under the Planning Act. Pipelines that do not fall within Annex I or II would not require an Environmental Statement.

2.8 Emissions

National Grid has regulatory obligations relating to emissions placed upon it by the Environment Agency (EA) in England and Wales, and the Scottish Environment Protection Agency (SEPA) in the form of:

- The Pollution Prevention Control (PPC) regime (Scotland);
- The Environmental Permitting regime (England and Wales);
- The Large Combustion Plant Directive (LCPD);
- The Industrial Emissions Directive (IED);
- The European Union Emissions Trading Regulations (EU ETS) within the UK.

2.8.1 Integrated Pollution Prevention and Control Directive

Emissions reduction investment on the NTS is driven by the Environment Permitting Regulations (2010) in England and Wales and by the Pollution Prevention Control (PPC) regime in Scotland; these regulations are in place to comply with the European Integrated Pollution Prevention and Control Directive (IPPC Directive) 1999 and for ease, the two UK regulations are now referred to together as the IPPC Directive throughout this document. The IPPC Directive is enforced by the competent authority in England and Wales by the Environment Agency (EA) and the Pollution Prevention and Control Regulations (2000) are enforced in Scotland by the Scottish Environment Protection Agency (SEPA).

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Deleted: implement the Directives in England, Wales and Scotland. They require a Gas Transporter proposing to undertake pipe-line works which fall in Annex I of the Directive to submit an Environmental Statement and apply to the Secretary of State for Energy and Climate Change for consent to conduct the work. ¶
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The completed Environmental Statement is submitted to the Department for Energy and Climate Change (DECC). It normally takes DECC between 9 to 12 months to review the Environmental Statement, complete the consultations required with all appropriate statutory and non statutory parties and grant the development consent required.¶
In England, works which fall within Annex I, or Annex II by virtue of their likely significant environmental effect, require development consent under the Planning Act 12008, and the Infrastructure Planning (EIA) Regulations 2008 apply.¶

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The Environmental Impact Assessment work examines in a comprehensive, detailed and systematic manner, the existing environment (natural, physical and built) and the proposed pipeline development. This typically requires the completion of a wide range of searches, studies and surveys over four seasons which takes a minimum of 12 months. ... [14]

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Once complete the Environmental Statement is submitted to the Department for Energy and Climate Change ... [17]

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<#>Town and Country Planning Act 1990¶
The Town and Country Planning Act ... [18]

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The IPPC Directive aims to achieve a high level of environmental protection through integrated prevention and control of the pollution arising from a wide range of industrial and agricultural activities. This legislation was designed to prevent/reduce emissions to air, land and water; noise, odour and vibration; production of waste and environmental incidents. Also, energy should be conserved and allowance made for site remediation as necessary. This was to help resolve environmental problems, such as pollution of air and water, climate change, soil contamination and negative impacts of waste and move the EU closer to sustainable patterns of production.

National Grid NTS's compressor stations are currently permitted and regulated, on an individual basis, under the IPPC Directive. Permits must be obtained for required installations and operation of the installations must comply with these permits, including compliant emissions with the Emission Limit Values¹⁰ (ELVs) based on Best Available Techniques (BAT).

The competent authorities which issue the permits (EA and SEPA) have extensive powers to take enforcement action if conditions of the permits are breached. Enforcement action can range from issuing a letter with an improvement notice to, in extreme circumstances, fines and prosecution.

The permits do not prescribe the use of any techniques or specific technology and they can take into account the technical characteristics of the installation concerned, its geographical location and the local environmental conditions.

In the determination of BAT, the competent authorities that issue permits have to take into account the BAT Reference Documents (BREFs). BAT are applied to achieve a high level of environmental protection, taking into account both the benefits that can be achieved against the associated costs:

- Best: the most effective to give a high level of protection to the environment;
- Available: economically and technically viable;
- Techniques: the technology used and the way in which an installation is designed, built, maintained, operated and decommissioned.

2.9 Large Combustion Plant Directive (LCPD) 2001

The LCPD was introduced by the European Parliament and Council to introduce measures to control the emissions to air of oxides of nitrogen (NOx), sulphur dioxide (SOx) and particulates from large combustion plants (i.e. plant with a rated thermal input of equal to or greater than 50 megawatt thermal). The specific aim of this Directive is to take steps to reduce the emissions to air of these pollutants as they are known to damage human health and contribute to acid rain.

The emission limits as defined in this Directive for NOx & SOx were not directly applied to the National Grid NTS's combustion plant by virtue of their age, however, the Industrial Emissions Directive has subsequently removed this age related exemption (see later). These limits were however taken to show 'indicative BAT' as plant was available on the market that could meet the limits.

¹⁰ Subsequently, the Industrial Emissions Directive (see later) led to more stringent Emission Limit Values for the emissions of oxides of Nitrogen (NOx) for all National Grid operated Large Combustion plant (gas turbines >50MW thermal input)

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2.10 Industrial Emissions Directive

The Industrial Emissions Directive (2010/75/EU) (IED) came into force on 6th January 2011. IED recasts seven existing Directives related to industrial emissions into a single clear, coherent legislative instrument. The recast includes IPPC, LCPD, the Waste Incineration Directive, the Solvents Emissions Directive and three Directives on Titanium Dioxide.

The timeline for implementation of certain provisions of IED follows the dates below:

- Transposition into UK law by 6th January 2013;
- Implementation from 6th January 2013 in respect of any new installation after that date (i.e. applies to all new plant in operation after the 6th January 2013 regardless of thermal input);
- Implementation by 6th January 2014 in respect of installations already in existence before 6th January 2013 (except large combustion plant) (i.e. will apply to all existing combustion plant <50MW thermal input from 6th January 2014);
- Implementation from 1st January 2016 in respect of large combustion plant already in existence before 6th January 2013. (i.e. applies to all plant >50MW thermal input from 6th January 2016).

The IED contains a provision for a Transitional National Plan (TNP) which allows operators who intend to opt-in enough time to comply with the IED's reduced ELVs. Plants which opt-in to the IED will be required to comply with the new ELVs, however, some flexibility in the early years is allowed through a TNP. The UK Government must submit the plan to the European Commission by 1st January 2013, however, the date by which plant must be nominated for entry into the UK plan is not yet known.

2.10.1 Impact of the Industrial Emissions Directive

The IED will strengthen the principle of applying Best Available Techniques (BAT) to the way in which a compressor installation is designed, built, maintained, operated and decommissioned through the setting of permit conditions:

(a) The directive states that the competent authority (EA or SEPA) shall set ELVs that, under normal operating conditions shall not exceed the permitted levels associated with the BAT conclusions;

(b) In addition to the requirement to apply BAT, the competent authority may set stricter permit conditions than those achievable by the use of BAT.

Derogations can be granted in specific and well justified cases where an assessment shows that the achievement of emission levels associated with the BAT conclusions would lead to disproportionately higher costs compared to the environmental benefits due to the geographical location, the local environmental conditions or the technical characteristics of the installation concerned. The competent authority shall in any case ensure that no significant pollution is caused and that a high level of protection of the environment as a whole is achieved.

The most significant impacts of the IED for National Grid NTS are the setting of a new ELV for Carbon Monoxide (CO) and a more stringent ELV for the emissions of oxides of Nitrogen

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The IPPC Directive defines the basic obligations to be met by all the industrial installations concerned that cover a list of measures for tackling discharges into water, air and soil and for tackling waste, wastage of water and energy, and environmental accidents. They serve as the basis for the drawing up of permits for the installations concerned. The IPPC Directive also determines the procedure for applying for, issuing and updating operating permits and minimum requirements to be included in such permits (e.g. compliance with the basic obligations, emission limit values for pollutants, monitoring of discharges, and minimisation of long-distance or cross-border pollution).¶

The IPPC Directive has been amended by Directive 2003/87/EC of the European Parliament and of the Council establishing a scheme for greenhouse gas emission allowance trading within the Community (also known as the EU Emissions Trading Scheme or the EU ETS).¶

Further amendments have been made by Directive 2003/35/EC of the European Parliament and of the Council providing for public participation in respect of the drawing up of certain plans and programmes relating to the environment.¶

The Pollution Prevention and Control (PPC) Act 1999 is the primary UK legislation that enables Regulations to be made implementing the IPPC Directive. Separate Regulations transpose the IPPC Directive in England and Wales, Scotland, Northern Ireland, and the offshore oil and gas industries. These replace the pollution control regimes known as Integrated Pollution Control and Local Air Pollution Control set up under the Environmental Protection Act 1990. ¶

The Pollution Prevention and Control (England and Wales) Regulations 2000 made under the PPC Act 1999 were replaced by the Environmental Permitting Regulations 2007 which came into force from 6 April 2008, combining the former with other Regulations dealing with waste management into one regulatory system. The Pollution Prevention and Contr[... [19]

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(NOx) for all operated Large Combustion Plant (gas compressors >50MW thermal input). Previously, Large Combustion Plant on the NTS was exempt from the LCPD ELV for NOx by virtue of its age. The IED is now, however, removing this age related exemption and the ELV for NOx will now apply to all Large Combustion Plant. Furthermore, the previous LCPD did not include an ELV for Carbon Monoxide.

Large Combustion Plant that cannot meet the new ELVs for NOx and Carbon Monoxide must cease to operate on 31st December 2015 unless certain conditions can be met:

(a) Any non-compliant gas compressors that can be declared as being required for operation for periods of less than 500 hours per annum will be assumed to be for "emergency use" only and the new ELVs will not apply. Operating hours will then be recorded and reported to the Environmental Regulators;

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(b) Plant may be entered into the UK TNP which will allow plant to operate within the ELV for NOx until 30th June 2020 provided the plant concerned can meet the new ELVs for Carbon Monoxide;

(c) A written undertaking can be made for individual plant to be able to operate for up to a maximum of 17,500 hours between 1st January 2016 and 31st December 2023. The affected plant must cease operation by 31st December 2023 or when it reaches the 17,500 hour limit, whichever is sooner (ELVs set out in the existing permits as at 31st December 2015 shall apply). It is unclear at this time when this required undertaking has to be made.

Even if these conditions can be met, all Large Combustion Plant operated must be compliant with new ELVs for oxides of Nitrogen and Carbon Monoxide by 31st December 2023.

When the requirement of the directive comes into force emissions from all Large Combustion Plant will be required to be tested on a six monthly basis regardless of the number of hours operated which is currently the case.

It is important to note that the other requirements of the existing Environmental Permitting (England and Wales) and Pollution Prevention & Control Regulations (Scotland) are maintained, i.e. the principles of 'BAT' will still apply to all of the gas compressor stations. Notwithstanding the new impacts arising out of the IED for the larger gas compressors, the drive to reduce emissions of NOx and Carbon Monoxide from the combustion plant with a total rated thermal input of below 50MW remains. The IED applies more stringent ELVs for large combustion plant and also removes the exemption from the Large Combustion Plant Directive previously enjoyed by the NTS compressor fleet.

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2.11 European Union Third Package

With respect to planning of the NTS this section outlines the applicable European legislation which National Grid NTS complies with, and outlines the progress of legislation and European network codes that may affect Transmission planning into the future.

The European Union (EU) Third Energy Package is a combination of three EU Regulations and two EU Directives (covering gas and electricity) which were ratified in 2009 and became effective from March 2011. The package seeks to achieve three energy policy objectives of increased security supply, development of a single European energy market, and meeting carbon emission targets. The package provides a framework of new institutions to develop the Network Codes to be applied at a European level. These are the European Network of

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Transmission System Operators for Gas (ENTSO-G) and the Agency for the Cooperation of Energy Regulators (ACER). The three relevant gas regulations and directives are as follows:

- Gas Directive: 2009/72/EC
- Gas Regulation: (EC) No 715/2009
- ACER Regulation: (EC) No 713/2009

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2.11.1 Ten Year Network Development Plan

The EU Third Package established the European Network of Transmission System Operators Gas (ENTSO-G) as a new institution to develop and implement European wide Network Codes and to develop the Ten Year Network Development Plan (TYNDP). The TYNDP is a forward-looking proposal for gas transmission infrastructure investment across over 30 European countries. The requirement for the TYNDP was in Regulation (EC) No 715/2009 which states that a task for ENTSO-G is the creation every two years of a “non-binding Community wide Ten Year Network Development Plan...including a European supply adequacy outlook”. The TYNDP provides the following:

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- Overview of the European supply and demand situation, through the development of different scenarios;
- Future infrastructure projects, by providing the latest information on potential capacity developments from numerous different types of infrastructure (LNG, Storage, Transmission);
- Models the resilience of the European Network through the development of scenarios by focusing on Market Integration, Supply Potential and Security of Supply.

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National Grid NTS has and will continue to play a very active role in the development of the ENTSO-G Ten Year Network Development Plan. National Grid NTS has a legal obligation enshrined in Article 12(1) of Regulation 715/2009 to co-operate with the TSOs of Europe within ENTSG. National Grid NTS provide both physical resources and data both annually and on a ad-hoc basis to help ensure that the TYNDP not only meets but exceeds the obligation placed upon it by the third energy package.

2.11.2 Security of Supply Regulation

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The gas Security of Supply Regulation No. 994/2010 “concerning measures to safeguard security of supply” aims to enhance security of supply by providing common assessment of Member States energy security arrangements. The regulation facilitates the following:

- ensuring member states provide gas to protected customers;
- ensuring a minimum standard of infrastructure resilience;
- ensuring member states make adequate preparations for a gas supply emergency;
- improving coordination between member states;
- ensuring the internal market for gas functions for as long as possible in the event of an emergency.

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Infrastructure resilience is measured against an ‘N-1’ standard i.e. that in the event of a disruption of the single largest infrastructure, the remaining infrastructure has sufficient capacity to satisfy the total demand occurring on a 1 in 20 demand day. Compliance with this standard is calculated by the use of a specified formula which looks at the ratio of total

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remaining supplies (after removal of the largest infrastructure) over total demand, with any result over 100% being acceptable.

The N-1 standard becomes legally binding on 3rd December 2014, existing projections forecast National Grid to meet the required standards, however should this not be the case European Infringement actions would expect to be taken, which could result in significant financial impacts.

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Chapter Three

Policy and Guidelines for NTS Planning

A number of policy and guideline documents are maintained for the purposes of planning and development of the NTS. Some of these are industry guidelines applicable to all high pressure pipelines. Others are maintained and developed by National Grid to ensure compliance with legislation, industry standards and best practice. This section lists the particular industry standards and National Grid NTS policies used for network planning.

3.1 Industry Standards and Guidelines

The guidelines adopted by National Grid are maintained and developed by the Institute of Gas Engineers and Managers (IGEM), which is a recognised authority on technical standards relating to the natural gas industry. These are available from the IGEM website at: <http://www.igem.org.uk/>.

3.1.1 IGE/TD/1 Steel Pipelines For High Pressure Gas Transmission

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This document contains a comprehensive set of guidelines covering the design, construction, inspection, testing, operation and maintenance of high pressure steel pipelines and associated installations used for natural gas transmission, operating between 16 bar(g) and 100 bar(g).

3.1.2 IGE/TD/13 Pressure Regulating Installations for Transmission and Distribution Systems

This document contains a comprehensive set of guidelines covering the design, construction, inspection, testing, operation and maintenance of pressure reduction installations used for natural gas transmission and distribution systems up to 100 bar(g).

3.1.3 IGE/GL/2 Planning of Transmission and Storage Systems Operating at Pressures Exceeding 16 bar

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This document contains guidance on the planning of high pressure natural gas networks, including the required agreements and processes between Gas Transporters operating different systems to ensure the continuity of supply across the system boundaries.

3.2 National Grid Policies

National Grid ensures that it is compliant with the legislative framework and guidance documents that affect the planning and development of the NTS. Two key policy documents that are directly related to network planning are its policies for Network Planning and Above 7 bar Network Analysis. These apply the recommendations made in the IGEM documents

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listed above to network planning for the NTS. The policy documents are supported by procedures and guideline documents that are used by analysts undertaking investment planning analysis on the NTS. The assumptions used for network analysis models of the NTS held within National Grid NTS procedures and guidelines are described in Chapter 9.

3.2.1 T/PL/NP/18 Policy for Network Planning

This document sets out the policy requirements for network planning activities for use with all natural gas systems operating at pressures up to 100 bar(g). Network Planning is the process of ensuring that the network can meet the duty required of it under operational and design conditions up to the planning horizon. The policy covers all distribution and transmission networks operated by National Grid and requires transmission networks to be planned in accordance with IGE/GL/2.

The policy is supported by specific sections in IGE/TD/1 and IGE/TD/13 for the design of specific components.

3.2.2 T/PL/NP/4 Policy for above 16 bar Network Analysis

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This is National Grid's policy for undertaking network analysis for all high pressure gas transmission pipelines operating above 16 bar(g) consistent with IGE/GL/2. The document covers system modelling, network analysis processes, record keeping and data security.

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Chapter Four

Investment Planning

National Grid undertakes investment planning over a ten-year planning horizon on an annual basis. The investment is developed using long term supply and demand forecast scenarios and other information gathered through commercial processes to book capacity on the system. This Chapter outlines the annual investment planning process.

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4.1 Future Energy Scenario Consultation

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National Grid is committed to stakeholder engagement, listening to our stakeholders and acting on what they tell us. The views of our stakeholders are crucial as we enter a period where the energy industry has to meet the challenges of providing secure and affordable energy, replacing ageing assets and moving to low carbon sources of generation to meet environmental targets.

The annual Future Energy Scenario (FES) Consultation includes the Transporting Britain's Energy (TBE) questionnaires, as well as one to one discussions with stakeholders, industry workshops and presentations to stakeholders.

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Our Future Energy Scenarios document describes in detail the assumptions behind the main scenarios used in planning analysis and future energy scenarios. In the past National Grid produced a single forecast of gas and electricity demand. This approach no longer provides a sufficiently rich picture of possible energy futures. National Grid now uses scenarios representing different views of the future. There are many possible futures, with considerable uncertainty regarding future levels of gas and electricity demand, sources of gas supply and levels of renewable generation, as well as many others areas.

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TBE Questionnaires are circulated to a range of industry players (Producers, Importers, Shippers, Storage Operators, Delivery Facility Operators, Transporters and Consumers) requesting supply and demand forecast data and inviting views on National Grid NTS's underlying assumptions for supply and demand. Shippers are required to provide this supply and demand information under the UNC TPD Section O. The TBE consultation forms part of the wider Future Energy Scenarios (FES) consultation process, the results of which are published on the National Grid website.

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4.2 Planning Cycle

National Grid NTS will commence its annual planning cycle after the initial data has been gathered through the FES process and will use this data to compile long term supply and demand scenarios. The process will consider those investments that may be required to respond to entry and exit capacity signals from the market. National Grid NTS will use detailed network models of the NTS under different supply and demand scenarios in order to understand how the system may behave under different conditions over a ten year planning horizon.

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During this process, Distribution Network Operators (DNOs) and shippers can apply for exit capacity on the NTS to support their long term needs, and Shippers may signal their requirements in the long term entry capacity auctions under rules set out in the UNC. The information received from these commercial processes will be used to decide the final set of investments that are necessary to develop the system. National Grid NTS will consider long term signals received for additional capacity above the prevailing obligated/contracted capacity levels and long term capacity bookings/reservations within obligated/contracted capacity levels within the same annual planning process, in order to satisfy its wider duties to develop and maintain the system in an economic and efficient manner.

4.2.1 Network Capability Analysis

National Grid NTS will undertake network capability analysis to identify the ability of the NTS to accommodate a given supply and demand pattern, respecting the maximum and minimum pressure requirements of the network, and the efficient and safe operation of the system. Analysis may be undertaken to identify capability for different needs, for example to identify Constrained LNG requirements, the maximum flow that may be supported at an entry or Exit Point, or the level of exit flexibility that exists on the system. The type of analysis (steady state or transient) and supply/demand scenarios will vary according to the study required. However the aim will be to find the point at which the network becomes "constrained" i.e. has reached its limits for the given scenario.

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National Grid NTS will use this analysis to inform commercial capacity processes, for example, the level of flow that may be achieved at any network Entry or Exit Point under certain supply/demand conditions compared to the obligations to release capacity to determine a "constraint volume" of gas at that Entry or Exit Point. It should be noted that it is not possible to directly model the concept of capacity in the commercial sense within these physical network models.

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4.2.2 Confirmation of Existing Projects

During the planning cycle, National Grid will analyse the first two years of the prevailing Investment Plan to verify whether the projects sanctioned during previous planning cycles are still required. In doing this, Licence requirements to release obligated capacity levels, commitments from capacity sold to Shippers in entry capacity auctions and commitments on exit for flat capacity, flexibility and pressures will be taken into account. National Grid NTS will also maintain a regular dialogue with Shippers, DNOs and Developers to ensure that information on the progression of their projects may also be used to inform National Grid NTS's investment decisions in a timely manner.

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If it is found that sanctioned projects are not required as proposed through previous planning cycles (for example, due to changes in the underlying supply and demand forecasts, or as a result of new information provided to National Grid by Shippers or new information made available in the public domain) then analysis will be carried out to determine which year the projects should now be completed for.

4.2.3 Investment Planning Analysis

Investment Planning Analysis is concerned with identifying the possible reinforcements that can be made to the pipelines and plant on the NTS to increase the capability of the system. National Grid NTS will undertake Investment planning analysis to determine the level of investment required to support changes to supplies or demands on the system.

4.2.4 Annual Plan Review

National Grid NTS will check the network models developed during the annual planning cycle to ensure that the correct planning assumptions have been used, that project alternatives have been considered and that there is consistency across the ten-year planning horizon. National Grid NTS will document the audit findings in a plan review report alongside any recommendations for improving the network models and analysis techniques used for future planning cycles. This review document will be used in the next planning cycle to update the network model and analysis assumptions.

4.3 Ten Year Statement

The Ten Year Statement details National Grid NTS's latest supply and demand [scenarios](#), proposed system reinforcement projects and investment plans. It is published at the end of the annual planning process and provides the platform on which the next annual planning process is built. National Grid NTS will describe the projects that are determined to be part of its final Investment Plan in the Ten Year Statement, after consideration of the information received from the long term entry capacity auctions (QSEC auctions) and incremental entry capacity release process, the long term exit capacity bookings made by DNOs and the exit capacity requirements of Shippers.

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The Ten Year Statement is published in line with Special Condition C2 of the Licence and Section O of the UNC. Further information on the [FES process](#) and the Ten Year Statement is available on our website at: <http://www.nationalgrid.com/uk/Gas/TYS/>.

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4.4 New Projects Requiring Entry or Exit Capacity

From time to time, there are enquiries made by customers on new projects designed to deliver additional gas supplies into the UK market or connect new storage facilities, interconnector pipelines or loads to the system.

National Grid NTS will discuss such prospective projects with customers to help them develop viable projects that deliver benefits for the UK security of supply. [Both a physical connection and commercial capacity rights are required to physically input gas to, or offtake gas from, the NTS. These are currently acquired through separate processes.](#)

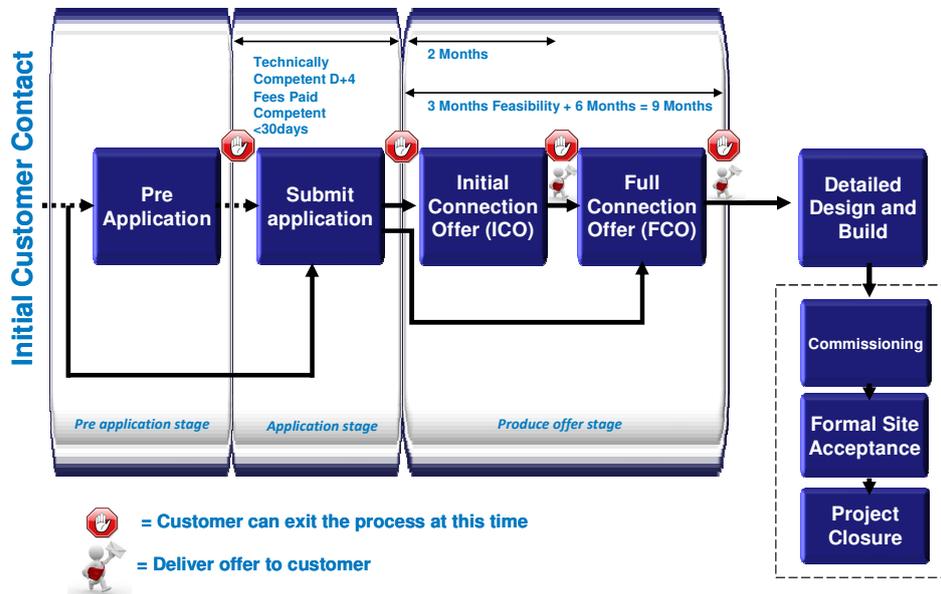
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4.4.1 Physical Connection

In order for a customer to connect to the NTS or to modify an existing NTS connection, they must first progress through stages of the formal application process for Connection Offers¹¹. This process starts after initial contact with National Grid NTS and varies depending upon what the customer requirements are. For example, initially, the customer can request and pay for National Grid NTS to provide an indicative view of the connection layout, an overview of the engineering/design work which would be required (including any specific studies) and an early estimate of construction costs should they wish to continue along the connections process.

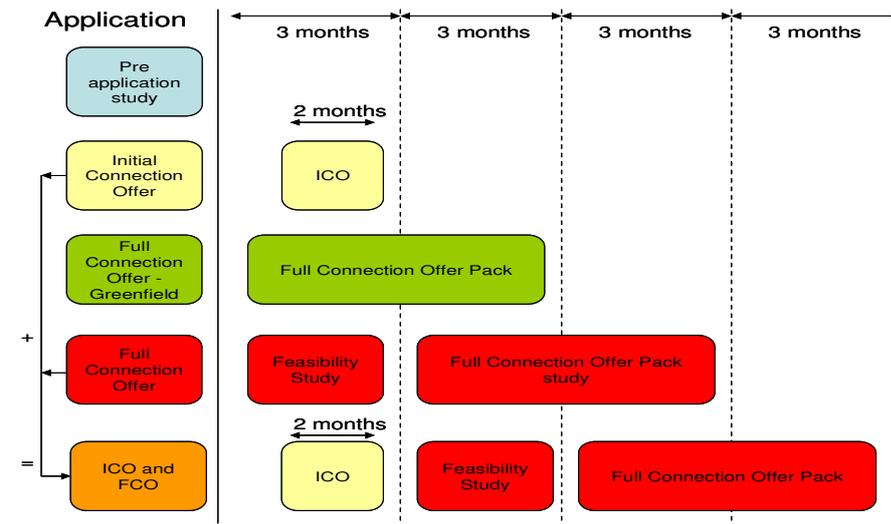
Prior to a detailed design stage and construction of the physical connection, the customer will be required to pay National Grid NTS to provide a formal offer for the connection to specify amongst other things, a connection completion date, a programme of works, delivering any specific design/engineering study reports and a draft construction agreement.

The timescales for National Grid NTS to deliver outputs for each stage of the connections process will depend upon the stage itself and complexity of the project. On completion of each stage of the connections process, the customer has the opportunity to exit the process. The connections process is summarised in the diagrams below:



¹¹ Subject to approval by the Authority of the connection process proposed under MOD0373.

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4.4.2 Securing Entry and Exit Capacity

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Users of the system must obtain entry and/or exit capacity rights on the NTS to flow gas and in order to trigger additional investment that may be required to support their potential gas flows onto and out of the NTS under the prevailing commercial arrangements described in the UNC. Currently, to trigger entry investment, Firm NTS Entry Capacity must be secured through a long term auction process and exit capacity, requiring specific exit reinforcement to the system, maybe secured through an annual application window (held in July of each year), an ad-hoc application (between October and June of the gas year) or through an Advanced Reservation of Capacity Agreement (ARCA) with National Grid.

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National Grid NTS is incentivised under its Licence to deliver entry and exit capacity in an efficient and economic manner. The Licence arrangements confirm National Grid NTS's revenue allowances for delivering additional entry or exit capacity. National Grid NTS would expect that such arrangements would be updated to include revenue allowances at new entry or Exit Points before any auction for entry capacity, or commitment to release exit capacity was made at these points.

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It should be noted that there may be a lead-time associated with customers obtaining access to the system. Under the requirements of the Planning Act, the anticipated lead time for the delivery of the majority of reinforcement projects is up to 7 years (84 months). Customers are encouraged to enter into discussions with National Grid NTS at an early stage so that they fully understand the processes required to connect and use the system.

A Planning and Consents Agreement¹² (PCA) is an agreement that is signed between the NTS User and National Grid that is designed to provide National Grid NTS with the financial security to undertake network analysis, project optioneering, engineering design activity and wider consultation with stakeholders prior to the receipt of a formal signal for capacity. A

¹² There is an industry expectation that the Planning and Consents Agreement or some form of them may be formalised under UNC in the future.

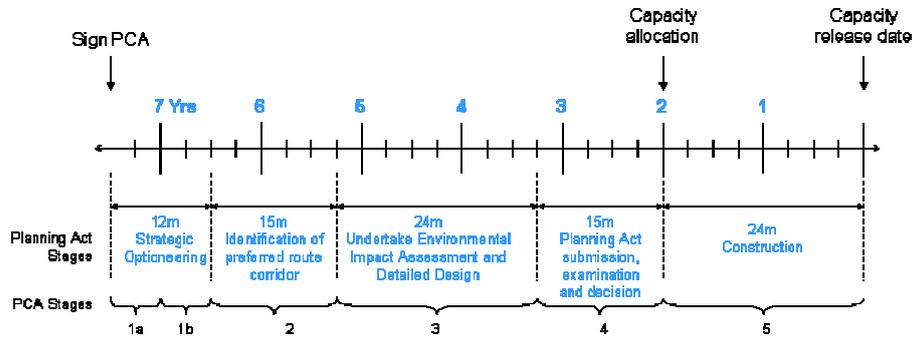
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PCA is split into a number of stages with each stage designed to deliver a subsequent phase of Planning Act requirements.

The diagram below is a generic timeline that was developed by National Grid NTS which illustrates the process steps leading up to a submission to the Planning Inspectorate and how the PCA process overlays these steps.



4.4.3 Alternatives to Investment

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When considering a customer's request for incremental capacity, in addition to physical investment, we will also consider all commercial options and operational arrangements that are available to us in order to determine the most efficient overall solution. These are described in more detail later in this document under Alternatives to Investment (9.19).

4.5 Operational Analysis

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The network analysis assumptions described in Chapter 9 will be applied to all network capability and investment planning analysis undertaken by National Grid NTS for the ten-year planning horizon.

National Grid NTS will use these assumptions as a basis for network analysis undertaken in operational timescales. National Grid NTS will also use other information that is available at the time to supplement these assumptions. For example, this may include information on commissioning programmes for new connections to the system or temporary operating restrictions required on plant for short term constraints.

Operational analysis will be undertaken in the shorter term to:

- Ensure security of supply is maintained
- Determine strategies to facilitate the safe and efficient operation of the NTS
- Assess the impact of operational constraints (such as maintenance activities or plant operating restrictions) on the physical capability of the system
- Determine the physical capability of the network to support commercial processes (such as Entry Capacity Transfer and Trade).

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Chapter Five

Supply

5.1 Long Term Supply Scenarios

The Ten Year Statement contains detailed information on, supply and demand scenarios, current reinforcement projects and investment plans, and actual flows seen on the NTS in recent years.

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Following the annual FES process, National Grid NTS will normally produce a number of scenarios for long term gas supply and demand that cover a range of possible futures for the GB energy market (FES scenarios). A central scenario will be chosen as a point of reference from which to develop other supply patterns anticipated on the NTS. All of this information will be published in the Ten Year Statement in accordance with the UNC TPD Section O.

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For the purposes of this document it is assumed that a single central scenario is available, however the methods for developing supply scenarios are applicable across more than one supply scenario. The basic steps involved in developing such supply scenarios are described below.

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5.1.1 Central Scenario and Supply Ranges

For the long term FES central scenario a number of possible alternative supply scenarios will be analysed in order to capture the range of possible supply patterns that could occur under specific market conditions.

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Supplies are modelled at the level required to capture their behaviour, for example at an Aggregated System Entry Point, terminal or sub-terminal level depending on the different sources of gas that enter the system at such points.

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5.1.2 Supply Scenario Identification

Generic supply scenarios will be developed through plausible situations that could occur for the NTS. These scenarios are qualitative descriptions of how a supply or group of supplies may react to certain market related events, including global market drivers. Reasoning and background will be included with each case to describe how that particular flow pattern may occur.

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Long term planning analysis requires that the supply levels must be matched to the total demand level. Due to the requirement to match supply with demand, some supplies may flow whilst others may not.

In order to model specific supply levels and patterns that meet demands within a particular supply scenario, information is needed on which supplies are believed to more likely to flow than others (essentially a supply ranking), which supplies may be displaced by other sources of gas (supply balancing) and the range associated with a maximum and minimum likely anticipated flows for each supply. It should be noted that these rankings may vary from one supply scenario to another, and that many specific supply levels and patterns may be examined under each generic supply scenario.

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Broadly, it is the highest demand days that drive investment. On these days the supply scenarios will be focussed on the potential interaction between:

- LNG imports;
- Pipeline imports; and
- Gas sourced from storage.

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The variability in potential supplies from the sources outlined above is considered to be large and the uncertainties are increased by a general lack of evidence to support assumptions about levels of gas flow. The interaction or extent to which one source of gas will displace another is also an unknown factor. Within the broad categories described above, different assumptions will be made for each element (for example, it might be assumed that pipeline import facilities each have different characteristics).

Gas from the United Kingdom Continental Shelf (UKCS) is generally considered to have a greater certainty of being delivered at the beach and as a consequence the range of uncertainty is reduced when compared to LNG imports etc.

At lower demand levels, the planning assumptions will generally favour gas supplies that are lower cost, or cannot be delivered to any other location than the United Kingdom. In this case the sensitivity analysis will focus on the potential for gas that can be delivered to interconnected markets to be delivered elsewhere.

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5.1.3 Supply Ranking Assumptions

For each scenario a ranking order (or merit order) will be determined for use in the balancing of supply and demand where more supply is available than that required to meet demand.

The ranking order for a particular supply or supply type will include an assumption for the relative cost of supply, as well as incorporating other more qualitative analyses. The lowest cost and least volatile gas is likely to sit at the top of the ranking order ("base load supplies" that are assumed to flow) and the most expensive, fluctuating supplies are likely to sit at the bottom of the ranking order ("volatile supplies" that are considered to be more price sensitive supplies that are most likely to flow at high demand/price). In this respect, qualitative analysis is particularly important in an environment where there appears to be a marked difference between marginal costs of supply and wholesale gas prices.

Supply ranking will also be developed by incorporating information gathered through the FES process and discussions with Developers/Shippers, for example for new supplies for which detailed cost information is unavailable or untested. Supply ranking may also incorporate observed behaviour from historic flow patterns.

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5.1.4 Supply Balancing Assumptions

National Grid NTS will determine the supply balancing assumptions in line with the qualitative requirements of each generic supply scenario. These balancing assumptions will allow some supplies to increase above the central scenario; some to decrease below the central scenario, in order to balance the increases and the remaining supplies will be fixed at the central scenario.

Supply flow increases above the central scenario level generally start with supplies at the top of the ranking order and work down. Supply flow decreases below the central scenario level generally start at the bottom of the ranking order and work up.

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5.1.5 Supply Range Assumptions

National Grid NTS will identify the plausible volatility for each existing supply. In determining the ranges, National Grid NTS will consider historic information on actual flows observed on the NTS for existing supplies. The maximum and minimum flow range for well established supply flows will be predicted by adding the observed volatility to the [central scenario](#). This analysis will be supplemented by consideration of the trends at each [Entry Point](#). For example, UKCS supplies are well established but the trend towards greater levels of depletion needs to be taken into account when forecasting future levels of gas supply.

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Supply ranges will also be based on [FES](#) information and discussions with Developers/Shippers where flow behaviour is anticipated to change from historical patterns, for example for new supplies or gas sources, or for supplies that are in decline.

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5.2 Supply Scenario Updates

Supply scenarios will be reviewed and updated annually as an input to the investment planning process, and will reflect National Grid NTS's view on the range of flow patterns that may occur on the NTS over the ten-year planning horizon.

National Grid NTS may review supply scenarios or develop additional supply scenarios during the planning year, as a result of new information being made available that influences its view on the likely level and flow behaviour of a particular supply. For example, new information may result from discussions with Developers and Shippers, or on the planning consent status of third party developments associated with gas supplies to the NTS or as a result of information received through entry capacity auctions [or exit capacity applications](#).

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Chapter Six

Demand

6.1 Long Term Demand Scenarios

There are primarily two sources of demand information available to National Grid NTS when considering investment planning needs: the gas demand [forecasts](#) and information collected through the UNC TPD Section B and the UNC Offtake Arrangements Document (OAD) Section H processes. These are described further below.

6.2 Demand [Scenarios](#)

National Grid NTS's gas demand [scenarios are developed as part of the annual FES process](#) using detailed analysis of demand drivers including (but not limited to) fuel prices and economic forecasts. Demands [scenarios will be produced for](#) different market sectors, with [scenarios](#) produced for both annual gas demand and peak day gas demand.

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Peak day forecasts are required under Special Condition A9 (Pipe-Line System Security Standards) of National Grid NTS's Licence to ensure that the network meets the security of supply standard. A 1-in-20 peak day forecast will be produced from statistical analysis of historic weather patterns that determines the demand level that is expected to be reached or exceeded on average once in every 20 years. Such a peak day demand level could be experienced on more than one day in a winter.

Load duration curves of annual gas demand will be produced from statistical analysis of historic data to determine the number of days each year on average that a demand level is reached or exceeded. Two curves will be produced for investment planning needs: a 1-in-50 load duration curve to reflect severe conditions that may be expected on each day of the gas year, and an average load duration curve to reflect average conditions that may be expected on each day of the gas year. National Grid NTS will normally use the average load duration curve to generate demand patterns for off-peak analysis, how specific analysis (for example for Constrained LNG requirements or determining interruption contract requirements) will require analysis using the severe load duration curve.

Sensitivities around the [demand scenarios](#) assumptions may also be considered in order to produce ranges of potential demand over the longer term.

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The Ten Year Statement will describe the assumptions driving the gas demand [scenarios](#) and the [scenario](#) data. [Futher detail on the assumptions behind the scenarios can also be found in the Future Energy Scenarios document.](#)

National Grid NTS's Demand Forecasting Methodology is published on National Grid's website and contains a detailed description of how statistical models are used to produce peak day forecasts and load duration curves.

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6.3 Offtake Capacity Statements, Offtake Pressure Statements and Long Term Planning Information

The UNC requires National Grid NTS and the DNOs to share information to ensure their systems are planned in a coordinated manner.

The UNC TPD Section B describes the annual Offtake Capacity Statement (OCS) and Offtake Pressure Statement (OPS) processes, which National Grid NTS and DNOs use to agree peak day requirements for DNOs for NTS Exit (Flexibility) Capacity and Assured Offtake Pressures respectively.

The Assured Offtake Pressures (AOP) agreed between National Grid NTS and DNOs are applicable for each day of the Gas Year and are independent of demand. AOPs were initially set during the sales of National Grid's Distribution Networks to provide DNOs with sufficiently high system input pressures to meet their planning requirements on days of high demand, up to 1 in 20 forecast peak demand levels. There is an interaction between AOPs and NTS Exit (Flexibility) Capacity when providing DNOs with sufficient levels of linepack to meet their diurnal storage planning obligation.

Under the enduring exit capacity regime, DNOs must book any additional Enduring Annual NTS Exit (Flat) Capacity required through the annual application process. These processes result in annual capacity bookings and pressure commitments that National Grid NTS is required to meet from the start of the next gas year and NTS Exit (Flexibility) Capacity for four years into the future. DNOs may also provide indicative NTS Exit (Flexibility) Capacity bookings for a fifth year to signal possible future capacity.

The information provided under the UNC OCS process only covers five years of the ten year planning period. For plan years six to ten, National Grid NTS will adjust the OCS bookings using the forecast data developed through the demand forecast process (and published in the Ten Year Statement) to understand potential DNO bookings in the later years of the plan. These assumptions of demand growth are needed to ensure that any projects identified in the early years of the plan can be assessed against potential demand through the ten-year period.

The UNC OAD Section H describes the long term forecast data that is shared between National Grid NTS and the DNOs. Both parties are required to provide the other with their forecast of gas demand, although there is no obligation on either party to use the projections provided. National Grid NTS may use the information provided by DNOs as part of their UNC OAD Section H data to develop demand scenarios for off-peak analysis. For example the information may be used to determine demand distribution across Distribution Networks for analysis on different days of the severe and average load duration curves.

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Deleted: ¶ <#>Potential Future Changes to OCS/OPS and Section H data¶ National Grid NTS is currently developing a proposal to change the existing OCS/OPS and Section H processes to introduce Assured Offtake Pressures that vary with demand. ¶ Currently, the Assured Offtake Pressures agreed between National Grid NTS and DNOs are applicable for each Day of the Gas Year and are irrelevant of demand. ¶ AOPs were initially set during the sales of National Grid's Distribution Networks to provide DNOs with sufficiently high system input pressures to meet their planning requirements on days of high demand, up to 1 in 20 forecast peak demand levels. ¶ However, as demand in an LDZ decreases, the requirement for a high input pressure from the NTS also typically decreases, as gas flows, and therefore pressure drops throughout the system, are reduced. As a result, DNOs do not typically require the AOPs at their Exit Points on the majority of the demand levels typically seen across an operational gas year. This is ultimately dependent on the type / design / configuration of an individual LDZ, however.¶ Therefore, National Grid NTS is developing a proposal to modify the existing OPS process to introduce AOPs that vary with demand so that the levels of pressure that National Grid are committed to provide to DNOs are more reflective of a LDZ's actual requirement at given demand levels... [20]

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Chapter Seven

Entry Capacity

7.1 Long Term System Entry Capacity Auctions

National Grid NTS makes NTS entry capacity available in a series of auctions. Signals (bids) received from long term system entry capacity auctions (QSEC auctions) are used within the planning process to confirm the need for investment.

National Grid NTS must, under the terms of its Licence, prepare a proposal for releasing incremental obligated entry capacity and submit this proposal to the Authority for approval. In addition, the UNC requires that notification of entry capacity allocations to Shippers who have bid in the QSEC auction occurs within 2 months of the end of the auction invitation period.

National Grid NTS must therefore submit its proposal for incremental obligated entry capacity to the Authority within one month of the end of the auctions, in order that allocation may occur in line with the UNC requirements and decision period stipulated under the Licence for the incremental obligated entry capacity proposal.

In order to fulfil its obligations under both the Licence and the UNC within the required notice periods, National Grid NTS will undertake network analysis before the annual QSEC auctions. The basic steps that will be taken before and after the QSEC auctions are shown in Figure 1 and are described below:

7.2 Development of Supply and Demand Scenarios

Supply and demand scenarios will be determined using the latest central scenario data as described above. For entry capacity assessment other demand scenarios may be used to test demand sensitivities. Demand will be assessed at peak (1-in-20 conditions), and at average and severe conditions (as appropriate) through the load duration curve. Analysis will be undertaken for each relevant year of the ten-year planning horizon.

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7.3 Network Capability Analysis for Entry Capacity

Network capability analysis will be undertaken to identify the capability of the NTS to support required flow patterns under the supply and demand scenarios developed from the central scenario.

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Entry projects identified from previous planning cycles will be reviewed to verify whether the projects sanctioned as part of previous plans are still required. In doing this, Licence requirements to release obligated capacity levels, commitments from capacity sold to Shippers in entry capacity auctions and commitments on exit for flat capacity, flexibility and pressures will be taken into account. National Grid NTS will also maintain a regular dialogue with Shippers, DNOs and Developers to ensure that information on the progression of their projects may also be used to inform National Grid NTS's investment decisions in a timely manner.

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If it is found that sanctioned projects are not required as proposed through previous planning cycles (for example, due to changes in the underlying supply and demand forecasts, or as a result of new information provided to National Grid NTS by Shippers or new information made available in the public domain) then analysis will be carried out to determine which year the projects should now be completed for.

7.4 Investment Planning Analysis for Entry Capacity

Investment planning analysis will be undertaken where a shortfall, or bottle neck, is observed in the capability of the NTS to support the required flow patterns under the supply and demand patterns tested. Each supply and demand scenario may generate a number of investment projects for consideration as the supply patterns are varied away from the central scenario supply pattern.

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An indicative Investment Plan will be determined by considering the investment projects required across the range of supply scenarios and for a range of demand scenarios, to develop a range of projects that best meets the anticipated flow patterns of the system, whilst paying due regard to National Grid NTS's wider obligations. These will include, but are not limited to, its obligations to develop the NTS in an economic and efficient manner and to maintain a safe and secure system. At this stage these investment projects should be only viewed as indicative and may be modified in the light of further detailed analysis and investigation. The supplementary analysis may also consider routeing or siting difficulties arising from environmental, safety and wider societal impacts.

The indicative Investment Plan will be updated when the bids placed in the QSEC auction are available. If required, the central scenario is adjusted accordingly.

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7.5 Analysis of Long Term System Entry Capacity Auction Signals

The QSEC auctions provide an important source of planning information on the levels of user commitment for baseline and incremental entry capacity. The indicative Investment Plan must be developed ahead of the QSEC auction, due to the amount of analysis required. The final Investment Plan for the annual planning cycle will be determined after auction signals have been analysed and potential projects have been reviewed.

Shippers can place entry capacity auction bids in accordance with the rules set out in the UNC. Once the auction information is received, National Grid NTS will apply the Incremental Entry Capacity Release (IECR) Methodology in line with its duties under the Licence to determine whether additional entry capacity should be made available at any Entry Point and the amount of incremental entry capacity that should be made available.

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Under its Licence obligations, default times are available to National Grid NTS both for determination of how much capacity to allocate (including project identification) and for the design and build of the identified projects. The lead times are such that National Grid NTS will, where possible, carry out a certain amount of speculative analysis ahead of an auction to identify what investment could be required if an anticipated pattern of bids is subsequently received. This analysis may need to be modified if an unanticipated pattern of bids are received in an auction.

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National Grid NTS is required to submit an incremental obligated entry capacity proposal to the Authority that describes how much incremental obligated entry capacity has been released as a result of applying its Incremental Entry Capacity Release Methodology. National Grid NTS can only permanently increase the level of entry capacity at an ASEP having first assessed how much entry capacity may be substituted to meet the increase as a result of applying its Entry Capacity Substitution Methodology. Entry Capacity substitution is the process of substituting Unsold Firm entry capacity from one or more ASEPs to another ASEP where demand for entry capacity exceeds the available obligated capacity quantities for the relevant period.

For the avoidance of doubt, National Grid NTS will not undertake analysis for Entry Capacity Transfer and Trade processes as part of its planning cycle, as these are only applicable in the shorter term and so do not form part of the long term investment process. These processes are described in the Entry Capacity Transfer and Trade Methodology.

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National Grid NTS will not proceed with projects identified to deliver incremental obligated entry capacity if any of the following cases apply:

1. Insufficient user commitment is signalled through the QSEC auction to justify the economic case for these projects.
2. The Authority determines that National Grid NTS should not implement the incremental obligated entry capacity proposal made by National Grid NTS under Special Condition C8D of its Licence.

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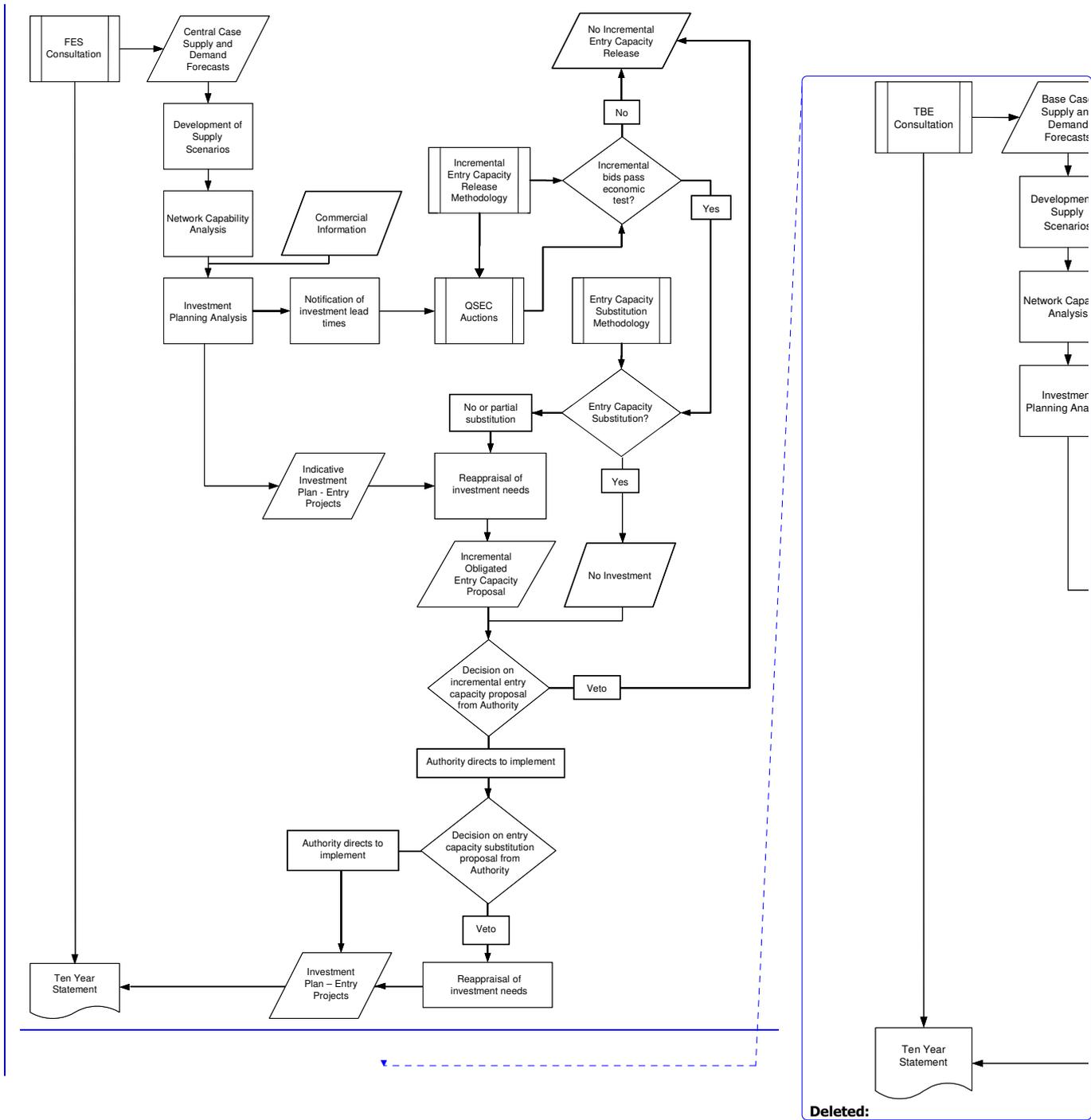
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National Grid NTS will re-evaluate projects identified to deliver incremental obligated entry capacity where the incremental entry obligated capacity proposal is modified in line with Special Condition C8D of its Licence.

National Grid NTS believes that such actions are consistent with its wider obligations to develop the NTS in an economic and efficient manner.

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Figure 1: Entry capacity investment planning process



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Chapter Eight

Exit Capacity

8.1 Long Term Exit Capacity Bookings

The processes used to book long term exit capacity differ from those used to book long term entry capacity.

Under enduring exit capacity arrangements (from 1st October 2012), NTS Exit (Flat) Capacity for both DNOs and shippers must be secured through an annual application window (held in July of each year), an ad-hoc application (between October and June of the gas year) or for Developers only through an Advanced Reservation of Capacity Agreement (ARCA) with National Grid NTS where specific reinforcement to the system is required. NTS Exit (Flexibility) Capacity and pressure requirements for DNOs will continue to be booked through the OCS process.

Further detail on the release of exit capacity on the NTS is given in National Grid NTS's Exit Capacity Release Methodology Statement, available on the National Grid NTS website.

The exit process is described in Figure 2 and discussed in more detail below.

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~~Deleted:~~ For the Transitional period (concluding on 30th September 2012), DNOs book their NTS Offtake (Flat) Capacity, NTS Offtake (Flex) Capacity and pressure requirements long term through the OCS process described in the UNC TPD Section B, and are required to provide financial user commitment for additional capacity bookings that would require specific reinforcement on the NTS over a given size by entering into an Advanced Reservation of Capacity Agreement (ARCA) with National Grid NTS.¶ Under the existing transitional exit capacity arrangements, shippers may only secure additional exit capacity in the longer term if specific reinforcement is required on the NTS in order to release that capacity and the capacity booking is over a given threshold. Shippers or project Developers (where no Shipper has committed to the project) must provide financial user commitment to trigger such reinforcement by entering into an ARCA with National Grid NTS. Shippers requiring capacity levels where no reinforcement of the network is required may book capacity under a shorter time frame and will then have an ongoing right to the capacity ceasing only on 30th September 2012.¶

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8.2 Development of Supply and Demand Scenarios

National Grid NTS will develop supply scenarios for assessing changes to exit capacity bookings that focus on local sensitivities to supply conditions that are known to exist on the NTS. For example, supply scenarios may be developed to explore the conditions on a part of the network when LNG importation or storage withdrawal is assumed, compared to the situation where LNG importation is not present and/or storage injection is required. Demand scenarios assessed may include a number of possible demand sensitivities at each level of demand analysed, for example:

1. Demand flows that occur in line with the central scenario, for all Exit Points on the NTS
2. Demand flows that occur in line with DNO OCS bookings and central scenario flows for directly connected NTS loads
3. Demand flows associated with storage sites and interconnector pipelines
4. Demand flows associated with large loads or loads located in sensitive areas of the network
5. Demand flows associated with interruptible loads directly connected to the NTS

The demand sensitivities will be developed according to the location of the exit capacity being assessed.

Demand will be assessed at peak (1-in-20 conditions), and at average and severe conditions through the load duration curve (as appropriate). Analysis will be undertaken for each relevant year of the ten-year planning horizon.

~~Deleted:~~ DNO OCS requests include the latest assessment of interruptible load in their respective networks.¶

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8.3 Network Capability Analysis for Exit Capacity

Network analysis will be undertaken during the OCS/[Exit Capacity Allocation](#) processes to identify the existing capability of the NTS to accommodate changes in the NTS [Exit \(Flat\) Capacity](#) requests made by DNOs. Further capability analysis may be undertaken from time to time as a result of enquiries made by customers to connect new loads to the NTS or increase existing loads on the system.

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Exit projects identified from previous planning cycles will be reviewed to verify whether the projects sanctioned as part of previous plans are still required. National Grid NTS will also maintain a regular dialogue with Shippers, DNOs and Developers to ensure that information on the progression of their projects may also be used to inform National Grid NTS's investment decisions in a timely manner.

If it is found that sanctioned projects are not required as proposed through previous planning cycles (for example, due to changes in the underlying supply and demand forecasts, or as a result of new information provided to National Grid NTS by Shippers or new information made available in the public domain) then analysis will be carried out to determine which year the projects should now be completed for.

8.4 Investment Planning Analysis for Exit Capacity

Investment will be undertaken for increases in the NTS [Exit \(Flat\) Capacity](#) bookings under the terms of the Exit Capacity Release Methodology Statement. Such increases may require a feasibility study to be initiated to assess possible options in order that the appropriate investment planning analysis may be undertaken. Investment will not be undertaken on the NTS for increases in NTS [Exit \(Flexibility\) Capacity](#) or Assured Offtake Pressures.

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NTS [Exit \(Flexibility\) Capacity](#) and requests for increases in Assured Offtake Pressures will be allocated to DNOs through the OCS process within the capability of the system.

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National Grid NTS will assess requests for changes to NTS [Exit \(Flat\) Capacity](#) first, followed by requests for changes to NTS [Exit \(Flexibility\) Capacity](#), followed by requests for changes in Assured Offtake Pressures. Off-peak data provided by DNOs under the UNC OAD Section H process will not be treated as a long term booking of NTS [Exit \(Flat\) Capacity](#) or NTS [Exit \(Flexibility\) Capacity](#).

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Parties that are directly connected to the NTS are required to register capacity in the short term under the process defined by the UNC TPD Section B.

Increases in exit capacity may be requested in line with the Exit Capacity Release Methodology Statement. [National Grid NTS can only permanently increase the level of exit capacity at an Exit Point having first assessed how much exit capacity may be substituted to meet the increase as a result of applying its Exit Capacity Substitution Methodology. Exit capacity substitution is the process of substituting Unsold Firm Exit \(Flat\) Capacity from one or more Exit Points to another Exit Point where demand for exit capacity exceeds the available capacity quantities for the relevant period.](#)

Enquiries may be made at any time about potential increases in load, or new loads connecting to the NTS, although there may be a lead time before additional capacity can be made available. Information on new and existing loads will also be collected through the [FES](#).

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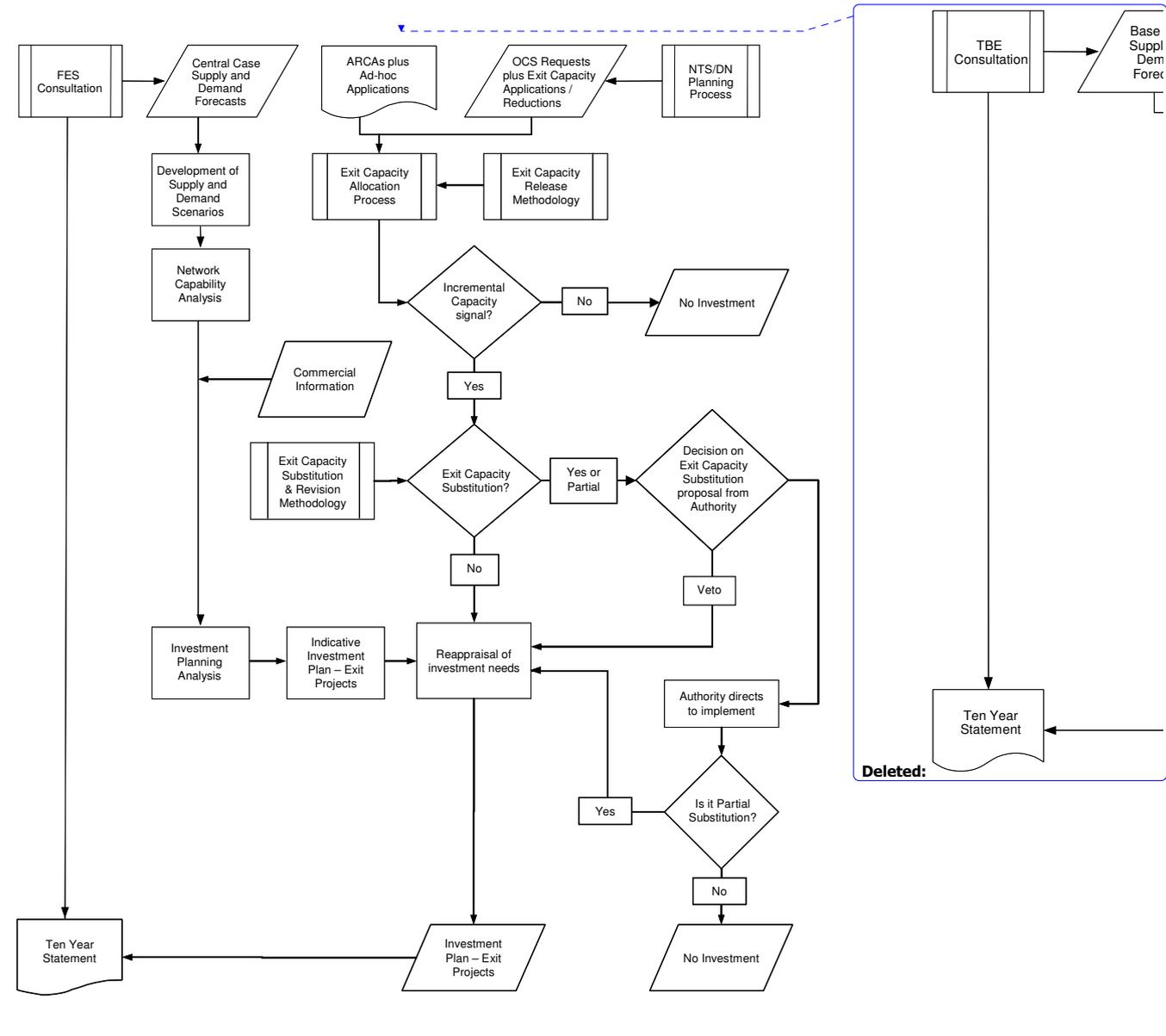
process, so the annual planning cycle will include the best known information to National Grid NTS on directly connected NTS loads, including any previous enquiries made by Shippers or Developers. Any investment required as a result of load enquiries received by National Grid NTS will therefore be consolidated into the next or future planning cycles.

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Figure 2: Exit capacity investment planning process

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Chapter Nine

Network Analysis

9.1 Basis of Network Analysis Models

National Grid NTS will use network analysis software to undertake planning analysis. The software will allow the user to work with a detailed mathematical model of the NTS to understand the likely flows and pressures on the system under a given set of supply and demand assumptions. The user will be able to vary the parameters of the model, including the supply and demand data to understand the physical limitations of the network. New pipelines, compressors and regulators will be added to the model connecting to existing points on the model as required to overcome system constraints. The tool will then be used to analyse the enhanced network.

The network analysis undertaken for the NTS will be derived from a base network model known as the "Master Network", which will contain the key elements of the NTS including pipes, valves, regulators and compressors. These components are the main elements to control and route the flow of gas through the system from supply points to offtakes.

The Master Network will be generated at the beginning of the annual planning cycle and will include all pipelines and plant planned for completion for the first winter in the ten-year planning horizon. The Master Network will be based on a network that is validated using actual operational data from a high demand day from the previous winter period in accordance with IGE/GL/2. The findings of the validation exercise will be included in the Master Network.

The Master Network will not contain any supply or demand information. The supply and demand data will be entered into the network for the scenarios requiring study. These models will be analysed until the network reaches a mathematical solution. Further analysis will then be undertaken as necessary to reconfigure and reinforce the system to ensure that the flow pattern may be supported within safe plant and pressure limits. All network models will be traceable back to the parent Master Network for that planning cycle.

9.2 Analysis Assumptions

On the NTS there are two critical times during the gas day for analysis, the times associated with maximum and minimum linepack (gas stock) in the system.

Maximum linepack is usually available around the start of the gas day at 0600 hours. This linepack can then be used over the day to meet diurnal fluctuations in demand and typically reaches a minimum at 2200 hours. The 0600 and 2200 times will be used for planning purposes although maximum and minimum linepack conditions actually observed on a gas day can vary around these times, depending on the prevailing flow patterns within the system.

These conditions may be modelled individually through steady state analysis or concurrently using transient analysis with suitable demand profiles.

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9.3 Steady State Analysis

It is usual practice for long term planning analysis (undertaken more than a year ahead of the gas day) to carry out steady state network analysis as this gives a good approximation of the likely network conditions, is quicker than transient analysis and is as appropriate once forecasting uncertainties are accounted for by the [flow margin](#). Steady state analysis assumes that flows are not profiled across the gas day, and so can be used to identify the transmission capability of the system.

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A steady state network with linepack maximised may be used to represent the start of day condition (0600) and a network with linepack minimised may be used to represent the minimum stock condition (2200).

Where reinforcement projects have been identified using steady state, transient modelling may be considered in order to further investigate and refine the potential solutions.

9.4 Transient Analysis

Transient analysis models the changes that may be seen within a gas day. Flow profiles for supplies and demands can be entered, along with changes in operating setpoints for compressors and regulators to understand variations in pressure, flow and linepack across the system across the day.

Transient networks used for network capability analysis and investment planning analysis will be analysed and solved to ensure that minimum pressures at 0600 and 2200 are not breached, and the total NTS linepack levels are maintained to ensure linepack balance across the day.

9.5 Design Margin

[The Design Margin comprises of two elements: a flow margin and pressure cover.](#) A flow margin is applied to pipe flows [and minimum pressures set at the extremities of the system](#) within the network model to account for uncertainties that arise when undertaking network analysis ahead of the gas flow day.

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The use of a design margin for design purposes is described in National Grid's Safety Case for the NTS (Section 17 - Adequate Network Pressure)¹³, which states:

"17.7 In the process of NTS Network Analysis an allowance needs to be made for variances in operational gas flows from the assumptions made in the design analysis. This is referred to as a "design margin". This is necessary to provide a margin of cover for a list of effects or events wherein the actual flows and pressures on the NTS will temporarily differ from those in the design analysis. This margin takes the form of a percentage increase in flows used for network analysis.

¹³ National Grid Gas, Gas Transporter Safety Case (Gas Transmission)

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17.8 The values of the design margin are reviewed periodically in accordance with the changes in operating regimes and the type of network analysis undertaken. The margin is broken down into the following elements:

- i. An allowance for compressor station tripping
- ii. An allowance for forecasting errors
- iii. An element for supply alerts.

17.9 In addition to the above allowances a further margin is added to provide cover at specific extremities to the NTS system, known as pressure cover, and will be applied within the network design analysis. The aim of this element is to ensure that the extremities of the NTS have sufficient locally available line pack to prevent deterioration below the agreed network pressure at the extremities.

17.10 The level of design used and pressure cover will be assessed and the assumptions stated in the Transmission Planning Code. From time to time the value will be externally assessed and any recommendations considered for inclusion."

The flow margin is composed of two separate components referred to as the transient and transmission components. The transient component encompasses compressor trips, forecasting errors, suppliers' alerts, producer variation away from the assumed steady 24-hour rate and operational state changes. The transmission component encompasses any demand and supply related changes to the underlying assumptions used during the typical three year period between the launch and commissioning of an NTS project.

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A research study in 1986 was conducted to determine the original value of the flow margin considering the flow margin required for steady state analysis assuming peak and severe conditions (transient analysis was not used for long term planning at this time). The level of the flow margin was set at 5% on the basis of the study. A further review in 2000 showed that there was no basis for changing the flow margin from 5%, although the transient component was shown to be more significant due to changes in the UK gas market between 1986 and 2000. Since 2000 there has been an increasing need to undertake both steady state analysis under demand conditions derived from the average load duration curve as well as transient analysis for long term planning. The most recent study in 2008 showed that due to the increased use of scenario analysis for long term planning some elements of the flow margin could be reduced.

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For transient analysis there is no requirement for the transmission component of the flow margin, however the transient component of the flow margin is still required for long term transient analysis to account for uncertainties in forecast supplies and demands, compressor trips and supply alerts (unavailability).

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The flow margin values for analysis of average conditions and transient analysis are therefore reduced from the 2% value used for 1-in-20 and severe conditions.

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No flow margin is used for any operational analysis (i.e. transient analysis undertaken for the short term using demand conditions derived from the average load duration curve, prevailing conditions or short term forecasts) to ensure the full capability of the pipeline is modelled and where events covered by the flow margin would be modelled explicitly.

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The values of the flow margin that will be applied in network analysis for the NTS are given in Table 1 below, alongside the implied transient and transmission component values.

Table 1: Flow margin values

Analysis type	Demand Condition	Transmission component	Transient component	Total
Steady state	1-in-20 peak day	0%	2%	2%
	Severe load duration curve day	0%	2%	2%
	Average load duration curve day	0%	2%	2%
Transient	1-in-20 peak day	0%	2%	2%
	Severe load duration curve day	0%	2%	2%
	Average load duration curve day	0%	2%	2%

As described in paragraph 17.10 of National Grid's Safety Case, National Grid NTS shall, from time to time, undertake reviews to validate the flow margin. Future changes to the flow margin will be agreed with the HSE and implemented through revisions to the Transmission Planning Code.

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Pressure Cover

The flow margin implicitly provides a general level of pressure cover across the system, as it is used to slightly increase the flows used in network analysis. The increased flows will lead to increased pressure drops along pipelines (compared to the case where the flow margin is not applied), which implies that where a minimum pressure must be observed (such as an Assured Offtake Pressure) the pressure observed operationally will be slightly higher than observed in the long term planning models for a particular supply and demand pattern. This pressure cover is then available for operational uncertainty e.g. compressor trips, changes to supply and demand forecasts and problems with supplies. The flow margin is assessed on the basis that Operating Margins gas held in store to mitigate for operational difficulties is available where needed within 2 hours of the operational problem being identified. The flow margin is not intended to provide cover for the period where Operating Margins gas is available.

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Although the flow margin itself applies a general level of pressure cover across the system, certain offtakes will be sensitive to the availability of upstream compression. These offtakes are generally at the extremities of the system and are those offtakes where other measures to manage flows (such as offtake switching) are not available. Additional pressure cover at these points must be determined through network analysis. This additional pressure cover may vary across years and between plan cycles, so the design condition which requires the most onerous pressure cover will be used for all subsequent planning cycles. Where a reduction in pressure cover can be achieved, the long term trend of pressure cover required

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and seen at the point in question will be assessed to ensure that large step changes in pressure cover do not skew analysis results across a period of time.

Additional pressure cover will be calculated for points identified to be sensitive to upstream compression by considering Assured Offtake Pressures at these points. The impact of a compressor trip on the profile of required pressures across the day at the offtake will be assessed, and additional pressure cover above that available from the flow margin will be determined. The additional pressure cover will be determined by considering pressure requirements up to 2 hours after the simulated compressor trip.

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9.6 Supply Flows

Supply flows are required data for the network analysis models, and will be derived for the supply scenario that is being considered.

It is necessary to allow for a quantity of gas to be included with the total supply flow for fuel gas used at compressor stations. This gas will be assumed to be delivered from the largest Entry Points on the system, and will be determined by the network analysis software based on the operation of compressors within the model.

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9.7 Demand Flows

Demand flows are required data for the network analysis models, and will be derived for the demand scenario that is being considered.

Interruptible demands that are directly connected to the NTS will be modelled as not consuming gas under peak day conditions. In order to model the effects of different interruption contracts, different high load conditions may be assumed when assessing contracts for individual loads. For a standard 45-day interruption contract these high load conditions will be derived from Demand Day 46 on the severe load duration curve.

Distribution Networks include their interruption assumptions within their offtake capacity requests as part of the OCS process.

9.8 Storage and Interconnector Flows

Storage sites and interconnectors will be modelled depending on their assumed behaviour within the supply and demand scenarios being modelled.

Storage sites and interconnectors will normally be modelled as supplies under high demand scenarios or when gas prices are high, unless the supply scenario used dictates otherwise.

Such flows may need to be modelled as demands on the system under certain conditions, for example in the summer months or when gas prices are relatively low, or for contractual reasons (for example where contractual storage re-filling/emptying cycles are observed).

It is also possible that these sites do not flow under certain supply or demand scenarios.

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9.9 Ramp Rates

Rapid load changes imposed on the pipeline system caused by entry and/or exit flowrates during a gas day can cause "abnormal" operating conditions which may have a deleterious impact on compressors and existing points of offtake or could affect the safety and security of the NTS. These would normally occur during transient conditions, such as during start-up or during shutdown operating scenarios, when flow fluctuations are at their greatest. The standard ramp rate offered is currently 50 MW/min.

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National Grid NTS will consider the impact of ramp rates requested above the prevailing standard ramp rate in order to maintain the safety and integrity of the system. This may require additional studies to be undertaken to consider the operating scenarios proposed (e.g. rapid load changes, emergency shut down events etc.) at the cost of the party making the request.

The agreed limits for ramp rates are incorporated within the relevant entry, exit or storage contracts¹⁴ made with the operator of the connected facility before gas flow can commence.

Due to the interrelationship between some third party facilities and the NTS, the third party may have to demonstrate to National Grid NTS that the facilities and operating strategies proposed do not have a detrimental effect on the NTS.

9.10 Maximum Entry and Exit Flows

The physical capability of installations connected to the system (for example, reception terminals and offtake installations) may impose limits on the maximum flows that can be attained at an NTS Entry or Exit Point. For example, these limitations may arise from site pipework configurations or pipework capacity constraints (where unacceptable pressure drops or excessive gas velocities would otherwise be observed through the pipework). National Grid NTS will observe the maximum flow limits imposed by such physical limitations at entry and Exit Points in the analysis it undertakes.

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9.11 Standard Volumetric Flows

The volume of any gas varies with temperature, pressure and molecular composition and is usually quoted in relation to reference conditions. Metric standard conditions for a gas assume a temperature of 15°C, pressure of 1.01325 bar and dry gas¹⁵ and are used to describe "standard volumes" of a gas.

The hydraulic models within the network analysis software used by National Grid NTS express flows as *standard volumetric flows* (mscmd) whereas commercial flows are usually described in energy terms (GWh/day or kWh/day).

Supply and demand flows will be supplied to the network analysis models as standard volumetric flows assuming a standard Calorific Value (CV), which is equivalent to an energy

¹⁴ Network Entry Agreements, Network Exit Agreements or Storage Connection Agreements

¹⁵ Gas that does not contain significant levels of water vapour, condensate or liquid hydrocarbons.

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flow in GWh/day. The network analysis software will use CV data entered at supplies to calculate CVs throughout the network, including demands. This allows the program to convert the demand flow data entered by the user to standard volumetric flows required with the hydraulic models. These assumptions will be used to ensure that energy flows used for commercial purposes (e.g. obligated entry and exit capacity levels) can be consistently and correctly applied within the network analysis models

The standard CV will be set at 39 MJ/m³, which approximates to the average CV of the gas in the system. Flows quoted using different CV assumptions will be converted to standard volumetric flows at the standard CV before input to the network analysis models to provide a consistent basis for the analysis.

9.12 Entry and Exit Pressures

Pipelines and plant are designed to operate within certain pressure ranges for safety and design reasons. Network capability depends not only on the supply and demand patterns and levels within the network, but also the maximum and minimum pressure limits that must be observed to remain within design limits to ensure safe operation of the network.

Maximum pressure limits will be observed at [Entry Points](#) and within the system. They arise at points where gas may flow from a system that is operated to a higher pressure limit.

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Minimum pressure limits will also be observed at [Exit Points](#) and are required for supporting downstream systems or loads. Some points of offtake require a higher pressure at 06:00 and/or 22:00 depending on the requirements of their downstream systems. These can be Assured Offtake Pressures (AOPs) for a Distribution Network Operator, and Anticipated Normal Operating Pressures (ANOPs) or other contractually agreed pressures for other customers directly connected to the NTS.

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The gas pressure that can be supported at a point of offtake may be affected by any of the following:

1. The presence of other significant loads in the vicinity
2. The location of terminals that may turn down significantly (or be shut down) at off peak periods
3. The location of compressors and their likely operation throughout the year
4. The presence of storage facilities in the vicinity
5. System configurations that may change throughout the year
6. The effects on agreed Assured Offtake Pressures and NTS [Exit \(Flexibility\) Capacity](#)
7. The effects of maintenance on plant in the vicinity
8. Pipeline maintenance, inspection, remedial work and modification activities in the area

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[Exit Points](#) at extremities of the NTS are likely to experience the lowest pressures on the system.

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Network analysis undertaken to determine network capability will model the system to observe the maximum and minimum pressure limits. Where the analysis shows that a

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pressure cannot be maintained, the supply/demand scenario under analysis will be deemed to indicate a “failed” network. Network capability will be deemed to have been reached at the point where maximum pressures and/or minimum pressures on the network can only just be sustained within operational tolerances. The resulting network is also known as a “constrained” network.

The following pressure limits will be observed within the analysis:

- Maximum Operating Pressures (MOPs) for pipelines, compressors and entry terminals
- Assured Offtake Pressures at [Exit Points](#)
- Anticipated Normal Operating Pressures at [Exit Points](#)
- Minimum contractual pressures within Ancillary Agreements at [Exit Points](#)

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9.12.1 Maximum Operating Pressures

IGE/TD/1: Edition 4 states, “The sustained operating pressure for a pipeline system should not exceed Maximum Operating Pressure (MOP)”. These guidelines recognise that excursions above this level may occur, due to the variations of pressure regulating devices and instruments used to monitor pressures. Information on such excursions is included within the Major Hazard Safety Performance Indicators reported to the HSE each year. Control pressures used for network analysis models will be set marginally below the MOP of the pipeline, compressor or entry terminal to be consistent with the operational setpoints used on pressure protection devices.

9.12.2 Assured Offtake Pressures

The Assured Offtake Pressure (AOP) requirements for each offtake to a distribution network will be modelled as minimum design pressures on the system at these points. [AOPs](#) will be agreed between the NTS and DNOs as part of the annual Offtake Capacity Statement process, described in the UNC TPD Section B. DNOs may request a change in an AOP under this process; however National Grid NTS are not obliged to accept a request for an increase in pressure at an offtake.

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Pressure requests will be subject to inspection and targeted analysis where it is deemed to be appropriate. Incremental pressure requests will be rejected wherever it is assessed that they:

1. Are unsustainable with planned and actual infrastructure
2. Require investments to be brought forward in the investment plan
3. Increase operational costs (particularly compression costs)
4. Increase volumes of Constrained LNG required to support high load conditions
5. Reduce capability at NTS [Entry Points](#)
6. Reduce available system flexibility capacity
7. Impact on other offtake points in the areas

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A range of supply and demand scenarios may be used in this assessment.

9.12.3 Anticipated Normal Operating Pressures

There are a number of Anticipated Normal Operating Pressures (ANOPs), which form part of the Network Exit Agreement (NExA) for large consumers. These pressures may only be changed after giving the Customer 36 months notice.

ANOPs are governed by the UNC TPD Section J, which allows a Shipper to request a specified pressure higher than the 25 bar(g) generally applicable to directly connected NTS loads. The ANOP is the lowest pressure at which National Grid NTS expects, under normal operating conditions, a given quantity of gas will be available for offtake at a given [Exit Point](#).

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All ANOPs will be modelled as minimum pressures for the first three years of the ten year planning horizon. From the fourth year of analysis onwards¹⁶, if an ANOP cannot be maintained under any scenario considered, National Grid NTS will give notice to the Customer for a reduction in the ANOP, under the terms of the relevant NExA agreement.

9.12.4 Contractual Exit Pressures

A Shipper may request that National Grid NTS enters into an Ancillary Agreement in order to meet a required pressure. Such an Ancillary Agreement may require the Shipper to fund the additional costs incurred by National Grid NTS in order to guarantee the pressure, which will then be made available under all operating conditions in accordance with the agreement. Examples of such costs are reinforcement costs or additional compression required to support the contracted pressure.

9.13 Compressors

Gas compressors are the key plant items used to “pump” gas through the NTS. They are also used to boost system pressures to support exit pressure commitments.

Compressor performance characteristics are basically defined by four curves relating to maximum speed, minimum speed, surge and choke. The four curves determine the operational envelope for the compressor. The compressor may operate safely within this envelope, however, different process efficiencies are observed at different points within the envelope, which affect the fuel used to compress gas passing through the compressor. The envelope and efficiency characteristics will vary between compressor units.

Where the network analysis models show that compressors must operate outside its envelope to achieve a particular flow and discharge pressure, and where reconfiguring the network does not remove this problem, it is possible that a compressor re-wheel or upgrade is required to ensure that the compressor may be safely operated.

Compressors may be operated under a number of different control mechanisms, for example, to achieve a target suction pressure, discharge pressure, or flow.

¹⁶ This timeframe is used to allow for the 36 month notice period for changing ANOPs

Limiting factors in compressor performance are related to the safe operation of the compressor train itself and include the maximum or minimum speed attainable from the gas generator or electric drive used to power the compressor, the minimum gas flows that may be safely permitted through the compressor, the maximum power available from the drive unit to turn the compressor, and the maximum discharge temperatures that may be reached on the outlet of the compressor station. Boundary control systems used to protect downstream pipelines from over-pressurisation may also limit the compressor station.

Compressor sites are usually designed with at least a one unit redundancy for standby purposes to ensure security of supply.

The network analysis software used by National Grid NTS will allow detailed modelling of compressor envelopes, control mechanisms, limiting factors and compressor fuel usage.

9.13.1 Minimum and Maximum Speeds

The physical capability of compressors is related to the maximum and minimum speed of the associated power turbine/compressor speed. This means that compressor units require a certain flow to be achieved before they can be used to compress gas.

The requirement to limit compressors to operate within the minimum and maximum speed limits imposed by the compressor envelope may constrain network capability.

9.13.2 Minimum and Maximum Flows

In addition to the minimum flow required to turn a compressor on to compress gas, compressors must be operated to ensure that they do not operate under surge conditions (where there is a high compression ratio relative to the flow) as this can damage the compressor.

High flows through the compressor can result in it operating under choke conditions, where high flows are achieved, at a relatively low compression ratio. Choke conditions do not always constrain compressor operation, but could indicate inefficient operation. High flows at or near the maximum speed for the compressor can lead to mechanical problems.

The requirement to limit compressors to operate within the surge and choke limits imposed by the compressor envelope may constrain network capability.

9.13.3 Maximum Power

The maximum power available from a gas driven compressor unit is dependent on various factors including ambient inlet air temperature. Generally, the colder the air temperature, the more power that can be derived to compress gas. The maximum available power therefore varies throughout the year, and is lower for summer conditions than for winter conditions. The maximum power available from an electrically driven compressor unit is not dependent on ambient air temperatures.

The maximum power that will be used within network analysis models is the base power level that may be achieved under normal operating conditions. Marginal increases in power (peak power) can be attained for very short periods of operation for certain types of gas generator however this can have an adverse effect on compressor performance and design life. Peak

power levels will not normally be used within investment planning analysis if this becomes a long term requirement as it is more efficient and economic to upgrade the compressor station. In any case, peak power will not be used in off-peak analysis.

The network analysis undertaken for the NTS will consider the limiting effect of seasonal variations in temperature on power available at gas driven compressor units by relating available power to total NTS demand at different points on the load duration curves. This may constrain network capability, especially at lower demand conditions.

9.13.4 Discharge Temperatures

Compressor station discharge temperatures are generally limited to between 45°C and 50°C (depending on the downstream pipeline specifications) as otherwise damage can be caused to some downstream pipeline coatings. Where consistently high temperatures are seen on the outlet of a compressor, aftercoolers may be used to reduce the gas temperature to acceptable levels and improve downstream transmission capability by virtue of a lower temperature. Where aftercoolers are not present, network capability may be constrained due to the requirement to operate to safe temperature limits.

9.13.5 Suction and Discharge Pressures

Due to gas flow characteristics and the relationship between pressure, velocity and the associated pressure losses caused by friction, it is generally more efficient to utilise the furthest upstream compressors towards their maximum discharge pressures in the first instance to minimise pressure losses and fuel consumption. Compressors near large [Entry Points](#) may be controlled on a suction pressure setpoint to enable high flows from these [Entry Points](#) to be accommodated. However, downstream conditions including demand levels and distribution have a key effect on the ability to use compressors effectively.

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National Grid NTS will seek to maximise the use of compression by operating compressors towards their maximum discharge design pressures or minimum suction design pressures when undertaking network analysis, subject to other constraining factors such as emissions levels, discharge temperatures, efficient fuel usage and operation within compressor performance envelopes.

9.13.6 Station Configuration

Compressor stations across the NTS are designed to meet the anticipated range of flow conditions. Some sites may be used for high demand conditions only, whereas other stations are equipped to allow a variety of different units to be used in parallel and/or in series configuration to achieve different pressure/flow characteristics.

National Grid NTS will ensure that compressors configurations are used effectively within network analysis models, considering the range of configurations that may be used to accommodate flow patterns on the system to maximise the capability of the system, subject to other constraining factors such as emissions levels, discharge temperatures, efficient fuel usage and operation within compressor performance envelopes.

9.13.7 Emissions

National Grid NTS is responsible for ensuring its compressor fleet meets legislative requirements relating to emissions under the IPPC and EU ETS Directives. Different gas compressor units used on the NTS may have different emissions levels when they are operated. Emissions levels can change across the compressor performance envelope. In general, older machines may have higher emissions than more recently installed units. The network analysis undertaken to model the NTS will consider the appropriate priority for using compressor units to ensure that emissions levels are minimised wherever possible. Electrically driven units do not contribute to site emissions (emissions from these are already accounted for in the power generation sector).

In particular, the total number of running hours agreed with the environmental agencies will be observed for sites with high emissions levels, when undertaking investment planning analysis. Additional investment to reduce emissions levels from sites may be required alongside any reinforcement projects identified to support changes in supplies or demands.

9.14 Regulators

Regulators are used to control and direct the gas flows in the system using either pressure or flow control and may be bypassed when not required. They are also used as pressure protection devices. Regulators induce a pressure drop when they are used to control flows or pressures, and may be limited to a maximum design flow or pressure drop which is modelled in the analysis. A zero pressure drop is assumed where a regulator is bypassed.

National Grid NTS will ensure that regulators are used effectively within network analysis models, in conjunction with compressor and multijunction configurations to maximise the capability of the system. The configurations used will be subject to other constraining factors such as compressor emissions levels, discharge temperatures, efficient fuel usage and operation within compressor performance envelopes.

9.15 Multi-junctions

Multi-junctions are complex arrangements of pipework, valves, regulators and other plant that are used to interconnect pipeline systems and control the flow of gas through the main pipelines in the NTS. Multi-junctions can be located close to compressor stations, and so there is a close interaction between the configurations used at these sites.

The configuration of multi-junctions can have a considerable effect on the network capability and the distribution of gas quality achieved across a distribution network.

National Grid NTS will ensure that different operational configurations at multi-junctions are used effectively within the network analysis models, to maximise the capability of the system, subject to other constraining factors such as emissions levels, discharge temperatures, efficient compressor operation and CV shrinkage levels.

9.16 Gas Quality and Temperatures

Gas quality and temperature effects will be modelled using the network analysis software to ensure accuracy and to monitor their effect on the pressure and flows calculated within the network. The effect of pipeline altitude above sea level on gas pressure within the pipeline will also be modelled.

Temperature effects modelled will include the effect of heat losses through pipe walls to the surround ground, cooling as gas travels through regulators and aftercoolers, and heating as gas travels through a compressor. The effect of changes in ambient air temperature on the operation of compressors and aftercoolers will also be modelled.

National Grid NTS will use estimated gas quality and temperature values for supplies as inputs to the network analysis models, to allow tracking of gas quality and temperature values as gas flows through the network. Estimated values will be derived from data provided by producers and Shippers, as well as historically observed values.

In order that consistent CVs are used for planning across the NTS and Distribution Networks, estimated CVs will be provided to the DNOs ahead of the annual OCS process. The CV assumptions quoted by DNs in their OCS and UNC OAD Section H data will be used to convert demand information to standard volumetric flows at a standard CV.

9.16.1 Wobbe index

The Wobbe index for any gas taken from the NTS must not be less than 47.2 MJ/m³ and not greater than 51.41 MJ/m³ under normal circumstances as described in the Gas Safety (Management) Regulations (GSMR). If a lower Wobbe index is observed at offtakes during the analysis, the network may be reconfigured to bring the impacted offtakes back into specification. It should be noted that this may constrain network capability.

9.16.2 Flow Weighted Average Calorific Value

Where the CV at an offtake is calculated as more than +/- 1 MJ/m³ compared to the Flow Weighted Average across a Local Distribution Zone within a Distribution Network, there may be an impact upon shrinkage and unbilled energy.

Where this occurs, the network may be reconfigured to bring the impacted offtakes back into specification. It should be noted that this may constrain network capability.

9.17 Reinforcement Projects

This section lists the common reinforcement projects that may be identified through the investment planning analysis undertaken for the NTS.

The reinforcements identified at this stage should be viewed as indicative projects, which may be modified after further detailed analysis to consider the feasibility and long term viability of the particular project. This may identify issues with routeing or siting arising from environmental, safety and wider societal impacts that mean the project is not progressed through to the construction phase.

9.17.1 Compressor re-wheels

When network analysis results indicate that compressor units continually breach their operating envelope (but are operating within the power limits of the gas or electric drive), it may be determined that the unit(s) on the compressor station are physically incapable of producing the required pressure and flow characteristics if reconfiguring the network cannot resolve the breach. In such a case, a re-wheel (redesign of the compressor performance characteristics) may be required.

9.17.2 Compressor flow reversal

Where new [Entry Points](#) change the direction of flow in an area, reversal of a compressor site flow configuration may be required. Although some sites have been designed to allow flexibility of configuration, others may require redesign to allow the compressor to “pump” in the opposite direction.

9.17.3 Regulators

A regulator project may be identified for either pressure protection as a result of an uprating project or to allow a new network configuration (to allow flows to be controlled in a different way). Regulators may also need to be resized to allow for higher flows, or redesigned to allow flow in either direction.

9.17.4 Aftercoolers

Compressor station discharge temperatures are limited to between 45°C and 50°C as above this temperature damage is caused to downstream pipeline coatings. If discharge temperatures constrain compressor operation, it may be necessary to fit an aftercooler, which reduces the temperature of the gas leaving the compressor station. This may also improve the downstream pipeline transmission capability. However, aftercoolers induce a pressure drop and require energy (normally electricity) to operate them, so the overall efficiency of the compression process and contribution to shrinkage must also be taken into account.

9.17.5 Uprating

It may be possible to add additional capability in the system by identifying uprating projects to test and re-certify pipelines and associated plant to increase their Maximum Operating Pressure (MOP) level. The ability to uprate a pipeline depends on factors such as the construction of the pipeline, testing level and the pipeline materials minimum specified yield strength. For this reason, pipeline uprating is not suitable for all NTS pipelines. Pipeline uprating may need to be undertaken in conjunction with other projects such as compressor up-rating and/or re-wheels. It may be affected by safety issues such as proximity to dwellings.

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9.17.6 New Compressor Stations or Units

Where network capability is limited by available compression power and/or maximum or minimum system pressures it is sometimes possible to add further compressor units or develop new stations for areas of the network requiring increased compression.

9.17.7 Pipeline Reinforcement

Where network capability is limited by maximum or minimum system pressures, pipelines may be duplicated (or triplicated) to reduce the pressure drops that are induced by gas flows. The network may also be reinforced by introducing additional pipelines to provide greater interconnection across the system and provide alternative routes for gas to flow from entry to [Exit Points](#). An example of such an interconnection is the Trans-Pennine pipeline that links the East Coast and West Coast NTS pipelines.

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9.18 Optimal Reinforcement

It is possible that there are a number of reinforcement options identified to enhance network capability. Reinforcement may be triggered by a requirement to increase network capability either under peak day conditions or away from peak day conditions; reinforcement may also be required to enhance the network capability by modifying existing assets to alter the way that they can be used.

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A checklist of potential reinforcement projects is given below, which will be used as guidance in ensuring that alternatives are examined, although this is not an exhaustive list of possible options.

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Project	Alternative Project	Considerations
Compressor Re-wheel Regulator	Upstream pipeline	Consider options for pipe diameters and lengths to obtain most economic solution overall.
	Upgrade upstream or downstream compressor	Consider compression ratio and discharge temperature requirements to ensure compressors are able to operate within design limits
New or Upgraded Compressor (including the provision of aftercoolers)	Upstream pipeline	Consider options for pipe diameters and lengths to obtain most economic solution overall.
	Uprate upstream compressor and/or pipeline	Consider effect on compressor power requirement to ensure uprating is feasible within design limits.
	Combination of smaller compressor units	Consider benefits of additional operational flexibility provided by numerous smaller compressor units against higher cost requirement.
Pipeline Reinforcement	Upgrade downstream compressor	Consider compression ratio and discharge temperature requirements to ensure compressors are able to operate within design limits
	Uprate upstream compressor and/or pipeline	Consider effect on compressor power requirement to ensure uprating is feasible within design limits
	Compressor flow reversal	Consider whether an existing compressor may be used to flow in a different direction or configuration

The cheapest capital cost solution may not be the optimal choice over the whole life of the asset therefore the long-term value of each option will be assessed by taking into account the requirements of our stakeholders. This is achieved by considering the Whole Life Value of investment options by assessing environmental factors, the economical and technical viability, the technology used, the way it is designed, built, maintained, operated and decommissioned.

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9.19 Alternatives to Investment Projects

There are alternative options we consider to meet customers' signalled incremental needs.
The following options not requiring capital expenditure will be considered alongside the indicative investment projects identified. These are not mutually exclusive, with it being possible for a combination of these being used to meet an individual capacity signal.

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1. Do nothing - this is a valid option if analysis shows the risk introduced by the incremental capacity is acceptable and can be managed operationally (including through capacity buybacks) or there is existing physical capability;
2. Capacity substitution (described earlier in the Entry/Exit Capacity chapters);
3. Network reconfiguration;
4. Compressor utilisation;
5. Constrained LNG;
6. Pressure sensitivities;
7. Commercial Capacity management and Contractual Solutions;

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Each of these options will be evaluated with due consideration being given to National Grid NTS's wider obligations to ensure that the NTS is able to support 1-in-20 peak demand conditions and to develop the NTS in an economic and efficient way.

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9.19.1 Network reconfiguration

Reinforcements identified during the development of the Investment Plan in any gas year being modelled may be found to be unnecessary if alternative network configurations are used. However this may also have undesirable effects such as increasing the anticipated levels of CV shrinkage that may be experienced on the system, increasing compression costs or emissions levels, or having an impact on reinforcements required for later years of the plan. Such impacts will be assessed before consideration is given to rejecting the reinforcement project.

9.19.2 Compressor utilisation

It may be possible to utilise compressor units normally reserved for standby or operate units at peak power levels for short periods to avoid reinforcement. These approaches are not without risks, affect maintenance costs and asset life, and would only be considered in exceptional circumstances where other options are limited or not available.

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9.19.3 Constrained LNG

Constrained facilities are situated on the parts of the NTS most remote from the beach terminals. In some cases, use of Constrained Services may be offset against additional investment on the system both for maintaining pressures and deferring projects on the upstream systems. Constrained services are used to support the system in the case of demand changes in the shorter term, where investment lead times prevent immediate system reinforcement.

The use of Constrained Services to save on pipeline investment is also known as transmission support. Shippers who book the Constrained Service from LNG storage facilities agree to provide transmission support gas to National Grid NTS on days of very high demand. They also agree to retain a minimum inventory level of gas in store so that transmission support gas is available all winter. In recognition of these transmission support obligations, customers of this Constrained Service receive a transportation credit from National Grid NTS, which reflects the saved investment in the pipeline system.

Identification of Constrained requirements, both rates and duration, is completed in the early years of the plan for booking purposes. To determine the duration of a Constrained Service for a particular site, analysis will be undertaken for various days between peak and the derived day of first likely use. The analysis will consider demand conditions derived from the severe load duration curve.

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9.19.4 Pressure sensitivities

It may be possible to defer or avoid investment if Anticipated Normal Operating Pressures at exit are reduced in line with the 36 month notice period that must be given to customers. National Grid NTS is obliged to maintain all prevailing Assured Offtake Pressures agreed through the OCS process and all contractual pressures determined by Ancillary Agreements. National Grid NTS can formally request permanent reductions in offtake pressures from DNOs by 30th April in each gas year. DNOs have until 30th June to accept or decline these requests.

9.19.5 Commercial Capacity management and Contractual Solutions

Investment projects may be deferred or avoided if National Grid NTS enters into capacity management agreements to manage the financial risks arising from capacity buyback at Entry or Exit Points (in accordance with UNC and Licence mechanisms to manage capacity buyback). Further risk analysis will be required to determine if this is a viable option.

The following diagram outlines the high level process for considering investment verses contractual solutions in relation to entry capacity.

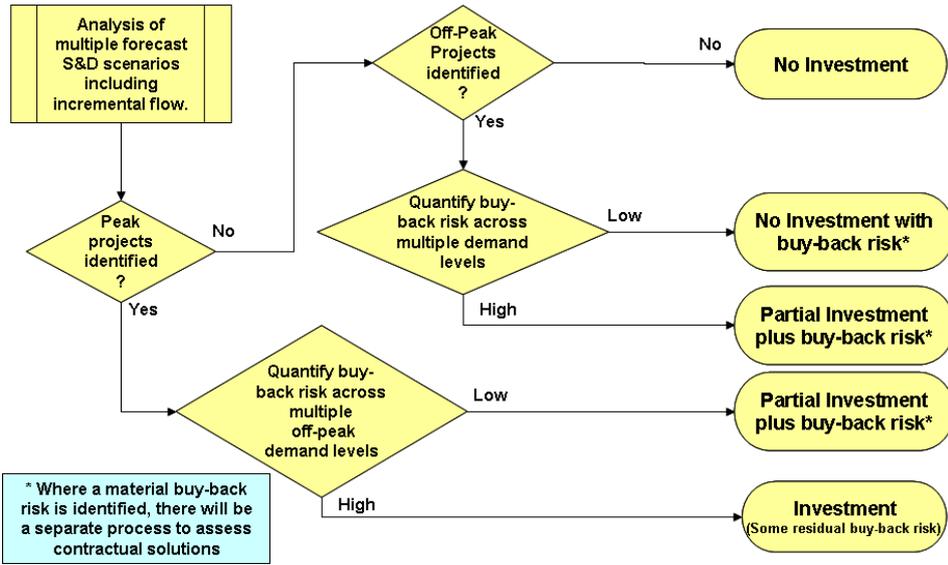
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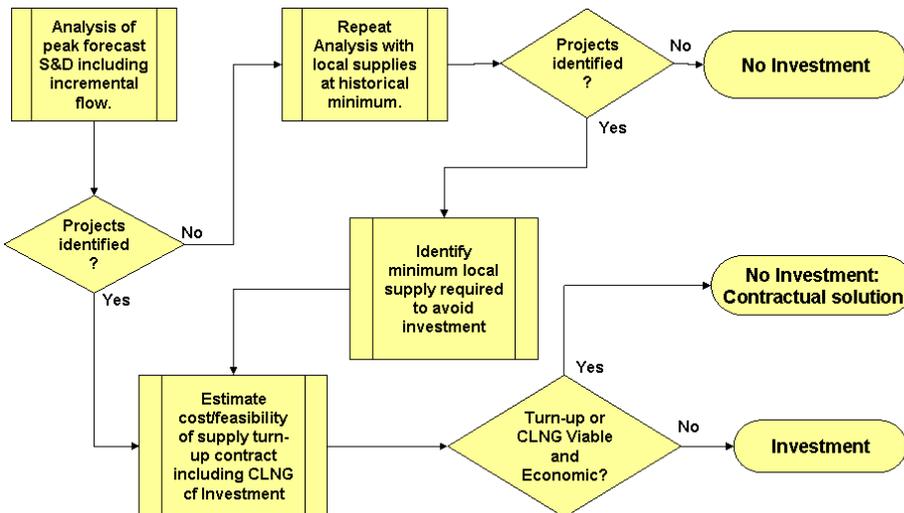
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The following diagram outlines the high level process for considering investment versus contractual solutions in relation to exit capacity.



When we have sufficient confidence that an auction or capacity signal will be received from our customers, or that our analysis shows a need to enhance capability for new flow patterns to maintain the existing levels of service, we assess the most efficient means of meeting the requirements.

Where we consider these are unlikely to be met through operational or short-term commercial options, we will assess the likelihood of a successful enduring contractual solution against the potential investment requirement. This could be many years ahead of receiving a formal auction or capacity signal.

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Potential contract forms fall into three categories:

1. Turn up: a customer agrees to increase supply (or demand) at a specified location;
2. Turn down: a customer agrees to reduce supply (or demand) or to reduce their capacity holding at a specified location;
3. Flow swap: a customer agrees to increase supply (or demand) at one location and reduce it by an equivalent amount at a different (non-interacting) location.

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Evaluation of their economic value will be dependent on the forecast distribution of frequency of use.

Appendix A

Glossary

Advanced Reservation of Capacity Agreement (ARCA)

An agreement between National Grid NTS and Shippers relating to future NTS pipeline capacity for large sites in order that Shippers or Developers can reserve NTS Exit Capacity in the longer term.

Aftercooler

A device fitted on a compressor station that cools the gas after the compression process, in order that the gas temperature may be maintained within safe limits for the downstream pipeline.

Assured Offtake Pressure (AOP)

A minimum pressure at an offtake from the NTS to a DN that is required to support the downstream network. AOPs are agreed and revised through the annual OCS process.

Anticipated Normal Operating Pressure (ANOP)

A pressure that National Grid NTS may make available at an offtake to a large consumer connected to the NTS under normal operating conditions. ANOPs are specified within the NExA agreement for the site.

Bar

The unit of pressure that is approximately equal to atmospheric pressure (0.987 standard atmospheres). Where the unit of bar is suffixed with the letter g, such as in bar(g), the pressure being referred to is gauge pressure, i.e. pressure relative to atmospheric pressure.

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The long term supply and demand forecast produced during the TBE consultation process.¶

BERR

Department for Business, Enterprise and Regulatory Reform

Calorific Value (CV)

The ratio of energy to volume measured in mega joules per cubic metre (MJ/m^3), which for a gas is measured and expressed under standard conditions of temperature and pressure.

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Central Scenario

[The long term supply and demand scenario produced as part of the FES process which is used as the starting point for network analysis.](#)

Compression Energy

Gas and electricity used by National Grid NTS to operate the transportation system that includes energy used for compressor fuel, heating and venting.

Compressor Station

An installation that uses gas turbine or electrically driven compressors to boost pressures in the pipeline system. Compressors are used to increase transmission capacity and move gas through the network.

Constrained LNG

A service available at some LNG storage facilities whereby Shippers agree to hold a minimum inventory in the facility and flow under certain demand conditions at National Grid NTS's request. In exchange Shippers receive a transportation credit from National Grid NTS.

CV Shrinkage

A quantity of energy that may not be billed to end consumers under the Gas (Calculation of Thermal Energy) Regulations 1996. CV Shrinkage arises from variations in CV across an LDZ above a certain threshold. End consumers within the LDZ may only be billed on a maximum CV assumption of 1 MJ/m³ above the Flow Weighted Average CV entering the LDZ.

Delivery Facility Operator (DFO)

The operator of a reception terminal or storage facility, who processes and meters gas deliveries from offshore pipelines or storage facilities before transferring the gas to the NTS.

Distribution Network (DN)

A gas transportation system that delivers gas to industrial, commercial and domestic consumers within a defined geographical boundary. There are currently eight DNs, each consisting of one or more Local Distribution Zones (LDZs). DNs typically operate at lower pressures than the NTS.

Distribution Network Operator (DNO)

Distribution Network Operators own and operate the Distribution Networks that are supplied by the NTS.

Entry Capacity

The right to deliver a quantity of gas into the NTS at an [Entry Point](#), as defined in the Licence and UNC TPD Section B.

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[Entry Capacity Substitution Methodology](#)

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[The Entry Capacity Substitution Methodology is produced in accordance with Special Condition C8D of the Licence This document describes the methodology that National Grid NTS will utilise when considering the substitution of NTS Entry Capacity from one ASEP to another ASEP where demand for entry capacity exceeds existing obligated quantities. In particular, it defines:](#)

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- [under what circumstances National Grid will consider such substitutions; and](#)
- [the process to be undertaken by National Grid to determine its proposals to substitute capacity and revise baseline quantities.](#)

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Entry Point

A point at which gas is delivered into the NTS. The Entry Point may comprise several facilities where gas is delivered. Also referred to as an Aggregate System Entry Point in the UNC.

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European Union Emissions Trading Scheme (EU ETS)

European Union market based policy commencing on 1 January 2005 to tackle emissions of carbon dioxide and other greenhouse gases, in order to help combat climate change.

Exit Capacity

The right to offtake a quantity of gas into the NTS at an Entry Point, as defined in the Licence and UNC TPD Section B.

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Exit Capacity Release (ExCR) Methodology

The Exit Capacity Release Methodology is produced in accordance with Special Condition C18 of the Licence. This document describes the methodology that National Grid NTS employs for the release of all exit capacity, i.e. incremental and existing system exit capacity.

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Exit Capacity Substitution and Revision Methodology

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The Exit Capacity Substitution and Revision Methodology is produced in accordance with Special Condition C8E of the Licence. This document describes the methodology that National Grid NTS will utilise to determine proposals for:

- the substitution of NTS baseline Exit (Flat) Capacity from one NTS Exit Point to another in response to the release of NTS incremental Exit (Flat) Capacity; and/or
- the revision to NTS baseline Exit (Flat) Capacity at NTS Exit Points in response to the release of Incremental Obligated Entry Capacity.

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Exit Point

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A point at which gas is taken from the NTS. The Exit Point may comprise several facilities where gas may be taken.

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Future Energy Scenarios (FES)

The Future Energy Scenario Consultation includes the Transporting Britain's Energy (TBE) questionnaires, as well as one to one discussions with stakeholders, industry workshops and presentations to stakeholders. The Future Energy Scenarios document describes in detail the assumptions behind our main scenarios used in planning analysis and future energy scenarios.

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Gas and Electricity Markets Authority (GEMA)

The Gas and Electricity Markets Authority ("the Authority") governs the natural gas industry in the UK, and is the body that grants and administers licences to Gas Transporters, Shippers and Suppliers.

Gas Transporter (GT)

Gas Transporters, such as National Grid, are licensed by the Gas and Electricity Markets Authority to transport gas to consumers.

GSMR

Gas Safety (Management) Regulations

Health and Safety Executive (HSE)

The HSE is the UK regulatory body responsible for regulating health and safety at work.

Industrial Emissions Directive (IED)

The Industrial Emissions Directive came into force on 6th January 2011. IED recasts seven existing Directives related to industrial emissions into a single clear, coherent legislative instrument. The recast includes IPPC, LCPD, the Waste Incineration Directive, the Solvents Emissions Directive and three Directives on Titanium Dioxide.

IGEM

Institute of Gas Engineers and Managers

Incremental Entry Capacity Release (IECR) Methodology

The Incremental Entry Capacity Release Methodology is produced in accordance with Special Condition C15 of the Licence. The methodology is used to determine the amount of incremental obligated entry capacity that should be released as a result of bids received in a QSEC auction.

Incremental Obligated Entry Capacity

Special Condition C8D of the Licence categorises entry capacity into different classes of capacity for revenue purposes. Incremental obligated entry capacity is capacity that National Grid NTS must offer for sale to Shippers above a pre-determined baseline level (also defined in the Licence) and is triggered through long term auction signals placed by Shippers.

Interconnector

A pipeline transporting gas to another country. The Irish Interconnector transports gas across the Irish Sea to both the Republic of Ireland and Northern Ireland. The Belgian Interconnector transports gas between Bacton and Zeebrugge and is capable of flowing gas in either direction. The Dutch Interconnector (BBL) transports gas between Balgzand in the Netherlands and Bacton.

IPPC

Integrated Pollution Prevention and Control

Kilowatt hour (kWh)

A unit of energy used by the gas industry. Approximately equal to 0.0341 therms. One megawatt hour (MWh) equals 10^3 kWh, one gigawatt hour (GWh) equals 10^6 kWh, and one terawatt hour (TWh) equals 10^9 kWh.

Licence

Used in this document to refer to National Grid's Gas Transporter Licence in respect of the NTS.

Linepack

The volume of gas within the National Transmission System at any time.

Liquefied Natural Gas (LNG)

Gas stored and/or transported in liquid form.

Load Duration Curve (1-in-50 Severe)

The 1-in-50 severe load duration curve is that curve which, in a long series of years, with connected load held at the levels appropriate to the year in question, would be such that the volume of demand above any given demand threshold (represented by the area under the curve and above the threshold) would be exceeded in one out of fifty years.

Load Duration Curve (Average)

The average load duration curve is that curve which, in a long series of winters, with connected load held at the levels appropriate to the year in question, the average volume of demand above any given threshold, is represented by the area under the curve and above the threshold.

Local Distribution Zone (LDZ)

A geographic area supplied by one or more NTS offtakes that comprises a part of a Distribution Network.

Millions of Standard Cubic Metres per Day (mscmd)

A standard cubic metre is the unit of volume, expressed under metric standard conditions (15°C, 1.01325 bar, dry gas), approximately equal to 35.37 standard cubic feet. 1 million standard cubic metres is equal to 10⁶ standard cubic metres. The units "mscmd" refer to a standard volumetric flow rate.

National Transmission System (NTS)

A high-pressure gas transportation system consisting of compressor stations, pipelines, multi-junction sites and offtakes. NTS pipelines transport gas from terminals to NTS offtakes and are designed to operate up to pressures of 94 bar(g).

Network Analysis

The modelling of the physical behaviour of a network of pipes, compressors and other equipment using mathematical software.

Network Entry Agreement (NEA)

An agreement that sets out the technical and operational conditions for the connection and is required by the Uniform Network Code (UNC). The NEA is agreed between the Delivery Facility Operator (DFO) and National Grid NTS and is normally discussed with the future operator of the entry facility in parallel with the connection process.

Network Exit Agreement (NExA)

An agreement that sets out the technical and operational conditions for the connection point. The NExA is agreed between National Grid NTS and the Facility Operator and/or the Shipper and is normally discussed in parallel with the connection process.

NTS Exit (Flat) Capacity

The right to offtake a quantity of gas from the NTS at a steady rate over a gas day as defined in the UNC TPD Section B. Only DNOs may hold NTS Exit (Flat) Capacity.

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NTS Exit (Flexibility) Capacity

The right to vary the offtake a quantity of gas from the NTS at from a steady rate over a gas day as defined in the UNC TPD Section B. Only DNOs may hold NTS Exit (Flexibility) Capacity.

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Offtake

An installation defining the boundary between the NTS and a DN or a very large consumer. The offtake installation includes equipment for metering, pressure regulation, etc.

Offtake Capacity Statement (OCS)

The agreement made between National Grid NTS and DNOs in respect of the DNOs' bookings for NTS Exit (Flat) Capacity, NTS Exit (Flexibility) Capacity and Assured Offtake Pressures as described in the UNC TPD Section B.

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Office of Gas and Electricity Markets (Ofgem)

The regulatory body responsible for regulating Great Britain's gas and electricity markets.

Peak Day Demand (1-in-20 Peak Demand)

The 1-in-20 peak day demand is the level of demand that, in a long series of winters, with connected load held at the levels appropriate to the winter in question, would be exceeded in one out of 20 winters, with each winter counted only once. Producer

Quarterly System Entry Capacity (QSEC)

NTS entry capacity available on a long term basis (up to 17 years into the future) via an auction process. Also known as Long Term System Entry Capacity (LTSEC).

Regulator

A device that may be used to control gas pressure or flowrate.

Shipper

A company with a Shipper Licence that is able to buy gas from a producer sell it to a supplier and employ Gas Transporter(s) to transport gas to consumers.

Shrinkage

Gas that is input to the system but is not delivered to consumers or injected into storage. It comprises Compression Energy, CV Shrinkage and Unaccounted for Gas.

Storage Connection Agreement (SCA)

A Storage Connection Agreement contains elements of the Network Entry Agreement (NEA) and the Network Exit Agreement (NExA).

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Storage Operator

The operator of a storage facility connected to the NTS.

Supplier

A company with a Supplier Licence that contracts with a Shipper to buy gas, which is then sold to consumers. A Supplier may also be licensed as a Shipper.

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Transporting Britain's Energy (TBE)

Transporting Britain's Energy is the annual process undertaken by National Grid NTS each year to gather information to inform its long term supply and demand scenarios for investment planning. [The TBE process forms part of the wider Future Energy Scenarios \(FES\) consultation process.](#)

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Transporter

See Gas Transporter.

Ten Year Statement (TYS)

The Ten Year Statement is published annually and contains information on National Grid NTS's long term gas supply and demand scenarios, and investment proposals over the ten-year planning horizon.

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Unaccounted for Gas

Energy transported through the NTS that cannot be accounted for, for example, as a result of metering uncertainty in the measurement of gas delivered to and taken from the system.

Uniform Network Code (UNC)

The Uniform Network Code is the legal and commercial framework that governs the arrangements between the Gas Transporters and Shippers operating in the UK gas market. The UNC comprises different documents including the Transportation Principal Document (TPD) and Offtake Arrangements Document (OAD).

UKCS

United Kingdom Continental Shelf.

Whole Life Value

[Whole Life Value is about truly understanding all the costs associated with an investment over its lifetime and sets out to achieve the optimal balance of functional requirements at the best price. It is important that decisions based on whole life cost are not made independently and that due consideration is given to performance of an asset throughout its lifetime, together with its wider environmental impact from initial design through to its eventual decommissioning or disposal.](#)

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Wobbe Index

The Wobbe Index is a parameter used to measure the interchangeability of fuel gases. Combustion appliances are designed to work safely over a particular range of Wobbe Index.

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Appendix B

References

The following documents are available at our website, <http://www.nationalgrid.com/uk/Gas/>:

- Ten Year Statement
- [UK Future Energy Scenarios](#)
- [Demand Forecasting Methodology](#)
- Incremental Entry Capacity Release Methodology Statement
- Entry Capacity Substitution Methodology Statement
- Entry Capacity Transfer and Trade Methodology Statement
- Exit Capacity Release Methodology Statement
- [Exit Capacity Substitution Methodology Statement](#)

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Further information on the UK and European legislative framework may be obtained from following websites:

- Office of Public Sector Information (<http://www.opsi.gov.uk/>)
- European Union (http://europa.eu/index_en.htm)
- DECC site (<http://www.decc.gov.uk/>)
- Health and Safety Executive (<http://www.hse.gov.uk/>)
- DEFRA (<http://www.defra.gov.uk/>)
- Environment Agency (<http://www.environment-agency.gov.uk/>)
- Scottish Environment Protection Agency (<http://www.sepa.org.uk/>)

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Field Code Changed**Field Code Changed**

A copy of National Grid's Gas Transporter Licence in respect of the NTS is available from [the Ofgem website](#) on the Electronic Public Register at:

<http://epr.ofgem.gov.uk/Pages/EPRSearch.aspx>

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The Uniform Network Code is available from the Joint Office of Gas Transporters website at:

<http://www.gasgovernance.co.uk/>

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A copy of the IGEM guidelines mentioned in this document may be purchased at:

<http://www.igem.org.uk/>

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Appendix C

Document Revision History

Version	Date of issue	Comments
0.1	4 July 2008	Draft document for discussion with industry.
0.2	11 July 2008	Consultation document
0.3	26 August 2008	Document submitted to Authority for approval
1.0	29 September 2008	Document approved by Authority
1.1	12 March 2010	Draft changes to Section 9.5 "Design Margin" for consultation
1.1	30 September 2010	Document submitted to Authority for approval
1.2	08 October 2010	Document submitted to Authority for approval (amended at the request of Authority)
2.0	04 November 2010	Document approved by Authority
2.1	29 June 2012	Consultation document
2.2	30 August 2012	Document submitted to Authority for approval

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Scenarios3	Offtake Capacity Statements and Planning Information	
	Entry Capacity	7.1
	Long Term System Entry Capacity Auctions	7.2
	Development of Supply and Demand Scenarios	7.3
	Network Capability Analysis for7.4Investment Planning	
	Analysis for Entry Capacity	7.5
	Analysis of Long Term System Entry Capacity Auction Signals .	
Exit8.1	Long Term Exit Capacity Bookings	
8.2	Development of Supply and Demand Scenarios	
8.3	Network Capability Analysis for4	
	Investment Planning Analysis for Network Analysis	9.1
	Basis of Models	9.2
	Analysis Assumptions	9.3
Steady State4	Transient9.5
	Design Margin.....	9.6
	Supply Flows	9.7
	Demand Flows	9.8
	Storage and Interconnector Flows	9.9
	Ramp Rates.....	10
	Maximum Entry and Exit9.11Standard Volumetric Flows	
9.12	Entry and Exit Pressures	
9.13.....	Compressors	
9.14.....	Regulators	
9.15.....	Multi-junctions	
9.16	Gas Quality and Temperatures	
9.17	Reinforcement Projects	
9.18	Optimal Reinforcement	
9.19	Alternatives to Investment Projects	
	Introduction.....	1
1.1	Document Scope.....	1
1.2	Document Structure	1
	Legislative Framework	2
2.1	Gas Act 1986 (as amended by the Gas Act 1995)	2
2.2	Planning Act 2008	2
2.3	National Grid's Gas Transporter Licence in respect of the NTS.....	3
2.4	Pipelines Safety Regulations 1996.....	5
2.5	Pressure Systems Safety Regulations 2000	6
2.6	Gas Safety (Management) Regulations 1996	6

2.7	Environmental Impact Assessment Directive	7
2.8	Town and Country Planning Act 1990	8
2.9	Integrated Pollution Prevention and Control Directive and the EU Emissions Trading Directive	8
	Policy and Guidelines for NTS Planning	10
3.1	Industry Standards and Guidelines	10
3.2	National Grid Policies	10
	Investment Planning	12
4.1	Transporting Britain's Energy Consultation	12
4.2	Planning Cycle	12
4.3	Ten Year Statement	14
4.4	New Projects Requiring Entry or Exit Capacity	14
4.5	Operational Analysis	14
	Supply	16
5.1	Long Term Supply Scenarios	16
5.2	Supply Scenario Updates	18
	Demand	19
6.1	Long Term Demand Scenarios	19

6.2 Demand

Page v: [2] Deleted			deepak.mistry			31/05/2012 10:20:00		
		19						
6.3	Offtake Capacity Statements and Long Term Planning Information	20						
	Entry Capacity	21						
7.1	Long Term System Entry Capacity Auctions	21						
7.2	Development of Supply and Demand Scenarios	21						
7.3	Network Capability Analysis for Entry Capacity	21						
7.4	Investment Planning Analysis for Entry Capacity	22						
7.5	Analysis of Long Term System Entry Capacity Auction Signals	22						
	Exit Capacity	25						
8.1	Long Term Exit Capacity Bookings	25						

8.2	Development of Supply and Demand Scenarios	25
8.3	Network Capability Analysis for Exit Capacity	26
8.4	Investment Planning Analysis for Exit Capacity	26
Network Analysis		29
9.1	Basis of Network Analysis Models	29
9.2	Analysis Assumptions	29
9.3	Steady State Analysis	30
9.4	Transient Analysis	30
9.5	Design Margin	30
9.6	Supply Flows	33
9.7	Demand Flows	33
9.8	Storage and Interconnector Flows	33
9.9	Ramp Rates	33
9.10	Maximum Entry and Exit Flows	34
9.11	Standard Volumetric Flows	34
9.12	Entry and Exit Pressures	35
9.13	Compressors	37
9.14	Regulators	40
9.15	Multi-junctions	40
9.16	Gas Quality and Temperatures	41
9.17	Reinforcement Projects	41
9.18	Optimal Reinforcement	44

9.19 Alternatives to Investment Projects 45

Page 9: [3] Deleted

deepak.mistry

10/06/2012 15:53:00

ix National Policy Statements (NPSs) have been produced by the Department of Energy and Climate Change, which were designated in July 2011. They set out the national policy framework for the development of energy infrastructure, and provide the primary basis for decision making.

Page 9: [4] Deleted

deepak.mistry

10/06/2012 15:53:00

have been drafted and recently consulted upon which aim to provide a framework within which future planning applications for energy infrastructure can be judged, following a pre-application consultation with stakeholders and communities.

Subject to the consultation and Parliamentary scrutiny, the Government intends to finalise and formally approve (“designate”) the NPSs in 2010.

During 2010 the new Coalition Government stated it aims to bring forward legislation to replace the IPC by creating a Major Infrastructure Unit as part of a revised Department for Communities and Local Government (CLG) that includes the Planning Inspectorate. These changes will require primary legislation and then some time to implement. In the meantime the existing planning system prevails.

National Grid’s Gas Transporter Licence in respect of the NTS

National Grid is bound by the terms of its Gas Transporter Licence (“the Licence”) in respect of the NTS. This contains a number of Standard, Standard Special and Special Conditions that National Grid must abide by in developing and operating the network and in conducting its transportation business. The licence obligations that are relevant to the planning and development of the NTS are described below.

Standard Special Condition A9: Pipe-Line System Security Standards

This condition sets out the security standard for the NTS. It requires that National Grid NTS plan the system to meet the 1-in-20 peak aggregate daily demand, including but not limited to, within day gas flow variations on that day.

The condition states that the 1-in-20 peak demand level should be calculated to include the load reduction through interruption or for contractual reasons and requires that historic data from at least the 50 previous years should be used when identifying the 1-in-20 peak day.

Special Condition C2: Long Term Development Statement

Under this obligation, National Grid NTS must publish an annual Long Term Development Statement for the NTS that sets out the likely use of the NTS, and the likely developments of the NTS, any other facilities or pipeline systems that may affect the connection charging and transportation charging arrangements over the next ten years. National Grid NTS publishes the Ten Year Statement (TYS) each year in accordance with this condition and the Uniform Network Code Transportation Principal Document (UNC TPD) Section O after consultation with the gas industry through the Transporting Britain’s Energy process.

Special Condition C8D: NTS gas entry incentives, costs and revenues

The NTS entry condition sets out the entry capacity incentive arrangements that National Grid NTS operate under, the obligations on National Grid NTS to offer entry capacity for sale, the levels of entry capacity that must be offered for sale, and the process for increasing the levels of entry capacity that must be offered for sale.

The condition describes two incentive mechanisms that incentivise National Grid NTS to manage its lead times for additional entry capacity release around a default lead time of 42 months.

The details of the Entry Capacity release process are set out in Section B of the UNC and the Incremental Entry Capacity Release (IECR) Methodology Statement.

Special Condition C8E: NTS gas exit incentives, costs and revenues

The NTS exit condition sets out similar requirements to that for entry capacity. Under the enduring exit arrangements¹ there is an incentive for National Grid NTS to manage lead times for additional exit capacity release around a default lead time of 38 months.

The details of the Exit Capacity release process are set out in Section B of the UNC and the NTS Exit Capacity Release Methodology Statement.

Page 9: [7] Deleted

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Page 9: [8] Deleted

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Pipelines Safety Regulations 1996

The Pipelines Safety Regulations (PSR) 1996 were made under the Health and Safety at Work etc. Act 1974. These Regulations are the principal health and safety legislation in the UK concerning the safety and integrity of pipelines, and are regulated by the Health and Safety Executive (HSE). They apply to all relevant onshore UK pipelines to ensure that these pipelines are designed, constructed, operated, maintained and decommissioned safely. In particular they class certain pipelines that transport certain “dangerous fluids” as Major Accident Hazard Pipelines (MAHPs). All natural gas pipelines operating above 7 bar(g) fall into this category.

PSR covers four areas:

Pipeline design

¹ The Licence describes certain mechanisms which would come into effect with enduring exit arrangements. The modifications required to the UNC to enable the enduring exit arrangements to be implemented are currently under consideration by the Authority.

- Pipeline safety systems
- Pipeline construction and installation
- Examination and maintenance

Operators of MAHPs are required to notify the HSE before construction, use and modification of the pipelines.

The Regulations require that construction of a new MAHP must not start until the operator has notified HSE at least six months prior to the start of construction (of the first stage of construction), although in practice the HSE are involved in discussions on the design and routing of the pipeline ahead of this notification period. Notification of at least 3 months is also required in other cases, for example in advance of

Major modifications or remedial work to the pipeline.

Changes in safe operating limits e.g. pressure uprating

Changes in fluid composition or type as this may have an effect on pipeline integrity

End of use of a pipeline (decommissioning and dismantling)

Changes in pipeline materials and equipment

Re-routing of pipelines

PSR further require that a pipeline operator has adequate arrangements in place to deal with an accidental loss of fluid from a pipeline, defects and damage to a pipeline or any other emergency affecting the pipeline. Operators of MAHPs must also have adequate emergency procedures, an appropriate organisation and effective arrangements in place to deal with an emergency involving a MAHP. Since pipelines may typically span large areas of the country, this requires the pipeline operator to liaise with local authorities along the route of the pipeline to ensure that they also have suitable emergency procedures in place to meet their obligations under PSR.

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Pressure Systems Safety Regulations 2000

The Pressure Systems Safety Regulations (PSSR) 2000 aim to prevent serious injury from the hazard of stored energy as a result of the failure of a pressure system or one of its component parts.

The Regulations require owners of pressure systems to demonstrate that they:

Have designed and constructed the pressure system to be safe with the appropriate protective devices where required;

Have established the safe operating limits of pressure systems;

Have a written scheme of examination in place prior to the use of the system; and

Maintain and repair the system to meet the required safety standards.

The written scheme of examination certifies the pressure system (including all protective devices, pressure vessels and pipework) for use and must be approved by a competent (independent) person. Examinations must be carried out by a competent person and must be reviewed at regular intervals as defined by the written scheme. The system must also be maintained properly to ensure that it is safe.

The main protective devices for the NTS are compressor stations, pressure reduction installations and boundary control systems.

Gas Safety (Management) Regulations 1996

The Gas Safety (Management) Regulations (GSMR) 1996 require each Gas Transporters to prepare a Safety Case document that sets out in detail the arrangements in place in four main areas:

- The safe management of gas flows through the network, particularly those parts of the network supplying domestic consumers
- The management of gas supply emergencies², including those measures in place to minimise the risk of a gas supply emergency occurring
- The management of reported gas escapes and gas incidents
- The management of gas quality and composition within safe parameters

Schedule 1 of GSMR describes the scope of the Safety Case. In particular, Schedule 1 states that the Safety Case must contain

“17. Particulars to demonstrate that the duty holder has established adequate arrangements to ensure that the gas he conveys will be at an adequate pressure when it leaves the part of the network used by him.”

The Safety Case must be formally accepted by the HSE. Once accepted, there is a legal obligation on the Gas Transporter to comply with its Safety Case. Any changes to safety management systems, key technical policies and procedures concerning gas supply emergencies, staff resource levels, system operation changes, organisational changes or changes to commercial arrangements may require a material Safety Case revision. Such revisions will need approval by the HSE before they may be implemented.

National Grid Gas's Safety Case contains a section (Section 17: Adequate Network Pressure) that is relevant to the planning and development of the NTS to ensure that adequate pressure is maintained within the network under a range of operating conditions. This section of the Safety Case outlines the guidance documents used in the planning of the NTS and (which are also described later in this document) and the use of validated network analysis models for planning (which is expanded upon in this document).

² The Gas Safety (Management) Regulations 1996 define a gas supply emergency as being an 'emergency endangering persons and arising from the loss of pressure in a network...'. The definition of danger is limited to risks from the gas itself.

Once complete the Environmental Statement is submitted to the Department for Energy and Climate Change (DECC).

It normally takes DECC between 9 to 12 months to review the Environmental Statement, complete the consultations required with all appropriate statutory and non statutory parties and grant the development consent required.

The timescales indicated above assume that access can be gained to the land as and when required to complete the studies and surveys needed; at the right time of year for the individual species requiring study. If access cannot be gained to the land, a Gas Transporter may have to revert to the compulsory purchase powers provided under the provisions of the Gas Act which can take up to 14 months to execute. Upon successful completion of the compulsory purchase orders, access to the land can be gained and the studies and surveys can then be started.

Town and Country Planning Act 1990

The Town and Country Planning Act 1990 is the land use planning system framework used to maintain a balance between economic development and environmental quality. Each country in the United Kingdom has its own distinct planning system with responsibility for town and country planning devolved to the Welsh Assembly and the Scottish Parliament.

Due cognisance has to be given to the Town and Country Planning Act for the provision of fixed assets such as Compressor Stations and Pressure Reduction Installations. So in order to develop a fixed asset, National Grid is required to apply for planning permission from the appropriate Local Council/Local Planning Authority. In the event that planning permission is refused, an appeal can be lodged that would be considered by an independent Planning Inspector appointed by the First Secretary of State or a full Planning Inquiry may be required.

The timescales for gaining planning approval for a development are indeterminate as they are dependent on the type, size and sensitivity of a particular development and are not defined in the legislation. If a Public Inquiry is required it can take up to 12 months to complete and once it is complete the Inspector appointed has to review all the information presented, produce a report and provide a recommendation to the Secretary of State. There is then a further period while the Secretary of State reviews the report and recommendation from the inspector, prior to reaching a determination in regard to the planning permission application. In England, works associated with a nationally significant infrastructure project may be included within the development consent order application to be determined by the Secretary of State for Energy and Climate Change.

Council Directive 96/61/EC of 24 September 1996 concerning integrated pollution prevention and control (also known as the IPPC Directive) aims to ensure a high level of environmental

protection and to prevent or, where that is not practicable, minimise emissions to air, water and soil, as well as waste, from industrial and agricultural installations in the European Community.

The IPPC Directive defines the basic obligations to be met by all the industrial installations concerned that cover a list of measures for tackling discharges into water, air and soil and for tackling waste, wastage of water and energy, and environmental accidents. They serve as the basis for the drawing up of permits for the installations concerned. The IPPC Directive also determines the procedure for applying for, issuing and updating operating permits and minimum requirements to be included in such permits (e.g. compliance with the basic obligations, emission limit values for pollutants, monitoring of discharges, and minimisation of long-distance or cross-border pollution).

The IPPC Directive has been amended by Directive 2003/87/EC of the European Parliament and of the Council establishing a scheme for greenhouse gas emission allowance trading within the Community (also known as the EU Emissions Trading Scheme or the EU ETS).

Further amendments have been made by Directive 2003/35/EC of the European Parliament and of the Council providing for public participation in respect of the drawing up of certain plans and programmes relating to the environment.

The Pollution Prevention and Control (PPC) Act 1999 is the primary UK legislation that enables Regulations to be made implementing the IPPC Directive. Separate Regulations transpose the IPPC Directive in England and Wales, Scotland, Northern Ireland, and the offshore oil and gas industries. These replace the pollution control regimes known as Integrated Pollution Control and Local Air Pollution Control set up under the Environmental Protection Act 1990.

The Pollution Prevention and Control (England and Wales) Regulations 2000 made under the PPC Act 1999 were replaced by the Environmental Permitting Regulations 2007 which came into force from 6 April 2008, combining the former with other Regulations dealing with waste management into one regulatory system. The Pollution Prevention and Control (Scotland) Regulations have not yet been replaced, however they have been modified several times to implement further European Directives and make clarifications within the Regulations themselves.

The main impact of the Directives and Regulations in the planning and development of the NTS is the requirement to reduce emissions levels from National Grid NTS compressor sites in England and Wales, and Scotland.

National Grid NTS undertakes an annual Network Review of all emissions related investment and best practice techniques used to control and reduce emissions from compressor sites. The findings of the review are discussed and agreed with the Environment Agency (EA) and the Scottish Environment Protection Agency (SEPA). Further information and a copy of the Network Review may be obtained from the environment agencies.

EU Third Package

Potential Future Changes to OCS/OPS and Section H data

National Grid NTS is currently developing a proposal to change the existing OCS/OPS and Section H processes to introduce Assured Offtake Pressures that vary with demand.

Currently, the Assured Offtake Pressures agreed between National Grid NTS and DNOs are applicable for each Day of the Gas Year and are irrelevant of demand.

AOPs were initially set during the sales of National Grid's Distribution Networks to provide DNOs with sufficiently high system input pressures to meet their planning requirements on days of high demand, up to 1 in 20 forecast peak demand levels.

However, as demand in an LDZ decreases, the requirement for a high input pressure from the NTS also typically decreases, as gas flows, and therefore pressure drops throughout the system, are reduced. As a result, DNOs do not typically require the AOPs at their Exit Points on the majority of the demand levels typically seen across an operational gas year. This is ultimately dependent on the type / design / configuration of an individual LDZ, however.

Therefore, National Grid NTS is developing a proposal to modify the existing OPS process to introduce AOPs that vary with demand so that the levels of pressure that National Grid are committed to provide to DNOs are more reflective of a LDZ's actual requirement at given demand levels.

Due to the interaction between AOPs and NTS Offtake (Flexibility) Capacity in providing DNOs with sufficient levels of linepack to meet their diurnal storage planning obligation, in order to introduce a change to the OPS process, an associated change to the existing OCS process is also likely to be required.

DNOs currently provide forecast levels of demand and diurnal storage at demand levels on both the average and severe load duration curves as defined in UNC OAD Section H, which National Grid NTS uses to develop demand scenarios for off-peak analysis Any proposed change to the existing OCS/OPS process may also include a change to the existing Section H long term planning data process.

As of the time of publication of this document, no timescales have been set for formal development and consultation of this proposal.

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Page 36: [22] Deleted	deepak.mistry	15/06/2012 14:49:00
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Figure 2: Exit capacity investment planning process

Page 36: [22] Deleted	deepak.mistry	15/06/2012 14:49:00
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