Consultation Report for BBL – NGG Interconnection Agreement

Summary

This document constitutes the Consultation Report in respect of the BBL – NGG Interconnection Agreement.

There was a single consultation response for this agreement, which supported the future arrangements for the TSOs. Additionally, the response requested feedback on the changes to the reference conditions to 0/25. The next steps will be for BBL to seek Ofgem approval for the Agreement supported by National Grid for the agreement.

At the GB industry engagement session on 2nd July 2015, a number of questions were raised around the arrangements for nominations and allocations including the utilisation of an operational balancing account (OBA)) and the TSOs have provided answers in this document.

A survey was carried out after the engagement session with 6 responses received – NGG would like to thank those stakeholders that responded. The majority of responses were in agreement that most stakeholders understood how the arrangements would work in future. Although some participants would have liked the Moffat IP arrangements meeting to have taken place on the same day unfortunately it was not possible or practicable to do so.

Consultation Details

Dates of Consultation 02/07/15 - 30/07/2015

Number of responses received: One

Table of Responses

Shipper/Party	Agreement Section/Condition	Response	NGG Response
Eon	Reference Conditions	Given that all relevant measurement parameters and values named in these Entry Provisions have been recalculated to meet the new reference temperatures (i.e. 0C for volume and 25C for calorific value mandated by INT), why can't this be implemented starting 01 st Nov 2015 even though INT requires use of 0/25 from 01 st May 2016 onwards?	Currently, BBL operates two physical measurement systems at Bacton; one to 15/15 conditions (for GB purposes) and another at 0/25 (for BBL purposes). The TSOs have agreed that BBL will only provide 0/25 measurements to NGG going forward which NGG will convert to 15/15. However, NGG cannot accommodate nominations at 0/25 until April 2016 when a change to its Gemini system is scheduled.

GB Industry Engagement Q & A Sessions 2nd July 2015

The following questions were raised in the session:

BBL Interconnection Agreement Session

- 1. When will the matching process for double sided nominations go live?
 - a. Double sided nominations will operate in respect of gas day 1st October 2015 onwards and single sided nominations in respect of gas day 1st November 2015 onwards.
- 2. How will the process work when there are two different nominations quantities input?
 - a. Under normal operating conditions the BBL processed quantity (PQ) will prevail.
- 3. Can the information provided at this presentation on nomination differences between IUK and BBL be made available?
 - a. Published at: http://www.gasgovernance.co.uk/sites/default/files/Nominations%20Matching%20Differences.xls
- 4. What is the Steering Difference tolerance?

- a. The Steering Difference tolerance is within expected steering differences which are currently not more than 0,2%. The agreed upon cumulative steering difference is set at 0,3 MCM.
- 5. How will Shippers receive notification of a within day "Proportional Allocation Day"?
 - a. Via the ANS facility.
- 6. Is a nomination required for a forward and reverse flow?
 - a. Yes, nominations are required per counterparty pair and per direction.
- 7. When will the Bacton Agent cease?
 - a. The Bacton Agent is scheduled to cease operations from gas day 1st October 2015.
- 8. Are NGG going to change the nominations to 0/25 reference conditions on a retrospective basis?
 - a. NGG does not propose to adjust Shipper nominations however, NGG acknowledges Shipper concerns about this issue and will communicate its proposed way forward.
- 9. What happens if the TSOs call a Proportional Allocation Day part way through the day?
 - a. The Adjacent TSO will allocate the preceding hours as nominated and the remainder of the hours as measured. Mod 510V contains further information regarding GB Shipper allocation which is out for consultation until 6th August 2015 and published on the Joint Office website http://www.gasgovernance.co.uk/sites/default/files/Modification%200510V%20v1.0%20(change%20marked) 0.pdf

Survey Responses – IUK & BBL Engagement Meeting

Question 1 - Was it made clear how the Interconnection Agreements are affected by the EU Network Codes?

Answer Options	Response Percent	Response Count
Yes	83.3%	5
No	0.0%	0
Partially	16.7%	1

Analysis – Majority understood the reasons for changes to the agreements.

Question 2 - Do you understand the principles of the OBA arrangements?			
Answer Options	Response Percent	Response Count	
Yes	100.0%	6	
No	0.0%	0	
Other (please specify)		0	

Analysis – OBA arrangements were fully understood by all respondents.

Question 3 - Was it made clear when Proportional Allocation will apply and how it will work?

Answer Options	Response Percent	Response Count
Yes	83.3%	5
No	16.7%	1
Other (please specify)		0

Analysis – Majority understood the principles of proportional allocation.

Question 4 - Was the consultation process adequately explained?			
Answer Options	Response Percent	Response Count	
Yes	100.0%	6	
No	0.0%	0	
Other (please specify)		0	

Analysis – The consultation process was fully understood.

Question 5 - Was there anything you thought would be covered that wasn't?		
Answer Options	Response Count	
Comments No Some screenshots of new Gemini screens and how th	2 e matching data will look would have been useful.	

Analysis – Comment received that Gemini screens would have been useful however the screens are not relevant to the presentation on the agreements.

Question 6 - Did this event meet your expectations?			
Answer Options	Response Percent	Response Count	
Yes	100.0%	6	
No	0.0%	0	
If not why not?		0	

Analysis – All responses confirmed that the meetings met their expectations.

Question 7 - Which IA presentations did you attend?			
Answer Options	Response Percent	Response Count	
IUK & BBL	100.0%	6	

Analysis – All 6 respondees attended both sessions.

Question 8 - What else could we do to aid your understanding of the changes to the IAs?		
Answer Options	Response Count	
	1	
Comments		
Nothing		

Analysis – No comments received for anything which might have aided a better understanding of the changes.

Question 9

Do you intend to submit a consultation response?		
Answer Options	Response Percent	Response Count
Yes	50.0%	3
No	50.0%	3
Other (please specify)		0

Analysis -3 out of 6 said they would be submitting a response.

Question 10

Please supply any other feedback related to the IA consultation sessions?	

Answer Options Response Count

3

Comment

I like the sessions and found them informative. My only concern is the timelines which are very short in the run up to go live.

It would have been good if the Moffat session could have been held on the same day.

I thought the presentation was detailed enough and I was pleased you had the subject experts on hand to answer all questions asked.

Analysis – There were 3 responses with 2 positive comments suggesting that the sessions were useful and informative. The feedback mentioned that it would have been useful to have the Moffat presentation on the same day. It was not possible to plan all of the meetings to occur within the same day due to continuing negotiations. Moffat IP arrangements are more intricate and required additional Tripartite Agreements to be agreed which took additional time. A further comment stated that it was concerned with tight timescales prior to 1st October. National Grid and the Adjacent TSOs have been working within challenging timescales to produce revised agreements to reflect changes brought about by the EU Network Codes. The agreements were presented to the industry as soon as it was practical to do so.