GCD04 Entry Capacity Discounts – Consultation Summary

Gas TCMF 6th September 2007

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Background

- Obligated NTS Entry capacity available in long term and short term entry auctions
 - 10% held back for short term (<18 months ahead)
 - reserve price discounts for daily firm
- Zero reserve price (100% discount) on the day consistent with National Grid NTS Licence obligation to hold a clearing auction
- Interruptible capacity available
 - UNC defined UIOLI basis (Previous 30 day unused firm)
 - 100% reserve price discount
- Are the Entry Capacity Discounts still appropriate?

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Discussion Paper

 NTS Gas Charging Methodology Discussion Paper NTS GCM 04: "Revisions to NTS Capacity Reserve Price Discounts"

- Issued 11th May 2007
- Closed out 21st June 2007.
- Extended to 23rd August 2007 [No further responses]



Questions for Discussion

- 1. Principle that in the absence of competition discounts should not apply?
- 2. Principle that in the absence of material likelihood of interruption, interruptible discounts should not apply?
- 3. Impact on Secondary trading?
- 4. Requirement for clearance of obligated capacity?
- 5. Should day ahead discounts be removed, removed conditionally or retained?
- 6. Should within day discounts be removed, removed conditionally or retained?
- 7. Should interruptible discounts be removed conditionally or retained?
- 8. Impact on TO Commodity?
- 9. Timing of future proposals?



Subsequent Changes

GCM01 Implemented

- Transportation Model based prices should recover greater proportion of TO allowed revenue
- Reduction (And subsequent review) of Baselines
 - Incentive to procure in long/medium term auctions
- Transfer/Trading/Substitution
 - Increased risk associated with leaving capacity procurement until day-ahead.
- Outcome of AMSEC auction
 - TO Commodity charge to be reset to minimal/zero level from 1st October 2007 as a consequence of revenue implied by the AMSEC auction



Industry Views

| Respondent | Stance | Views |
|------------------|--|--|
| Total E&P UK Plc | REMOVE: Support conditional removal of discounts | "shippers at certain entry points buy substantial amounts of capacity on the day-ahead and within day auctions, forcing NG to apply ever increasing TO Commodity Charges to compensate for the under-recovery" "in the absence of material likelihood of interruption, NTS interruptible capacity should not be auctioned at zero reserve price."" |
| EDF Energy | REMOVE: Support removal of discounts | "encourage Users to book long term capacity, and encourage the development of a secondary market for trading capacity." Removal of discounts "may expose NGG to over recover " |
| Statoil UK | COMMENTS: | "believes that it may be better to consider this issue once the effects of the current changes to the entry capacity regime can be demonstrated." |
| RWE npower | RETAIN: Support retaining discounts | "still believe that the availability of firm and interruptible entry capacity close to the gas day is an important feature of the current regime" " the wider changes proposed to the regime will go a considerable way to addressing many of the concerns highlighted in the discussion document. " |
| E.On UK plc | RETAIN: Support retaining discounts | "do not agree that discounted reserve prices are encouraging shippers to avoid procuring entry capacity in the long-term auctions" "question whether there is really any need to encourage secondary trading at an ASEP when there is a surplus of primary capacity."" |

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Summary

Consider

- Revised baselines, Substitution, Transfers & Trades might incentivise greater participation in QSEC/AMSEC auctions hence minimising impact of DSEC discounts
- AMSEC implied revenue will result in zero TO Commodity Charges
- Propose
 - Consider changes for October 2008

