nationalgrid

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The Joint Office, Relevant Gas Transporters, shippers and other interested parties Steve Fisher Gas Charging and Capacity Development Manager

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21st July 2015

Dear Colleague

National Grid's Formal Consultation on Capacity Methodology Statements

National Grid Gas plc's ("National Grid") Gas Transporter Licence in respect of the NTS ("the Licence") sets out obligations to develop and modify the:

- Entry Capacity Release Methodology Statement ("ECR"); and
- Exit Capacity Release Methodology Statement ("ExCR");

together, the Capacity Release Methodology statements defined in Special Condition 9B, and the

- Entry Capacity Substitution Methodology Statement ("ECS");
- Exit Capacity Substitution Methodology Statement ("ExCS"); and
- Entry Capacity Transfer and Trade Methodology Statements ("ECTT");

together, the Capacity Methodology Statements defined in Special Condition 9A.

As part of the review process for these statements, we are obliged to consult with interested parties on the proposed changes before formally submitting them to the Authority for a decision. This letter therefore provides notice of the proposed Capacity Release Methodology Statements and Capacity Methodology Statements and invites your views on the proposals.

National Grid has been working closely with industry to develop the processes for the delivery of NTS Entry / Exit Capacity at Interconnection Points to facilitate compliance with EU Regulation 984/2013 (Capacity Allocation Mechanisms) and continued compliance with Annex I to EC regulation 715/2009 (Congestion Management Procedures). This has resulted in the Authority decision to implement UNC Modifications:

- 0500: "EU Capacity Regulations Capacity Allocation Mechanisms with Congestion Management Procedures";
- 0501V: "Treatment of Existing Entry Capacity Rights at the Bacton ASEP to comply with EU Capacity Regulations";

To facilitate the implementation of UNC Modifications 0500 and 0501V Ofgem have directed that a number of changes will be made to the Licence. Details of these changes can be found on the <u>Ofgem website</u>¹.

¹ https://www.ofgem.gov.uk/publications-and-updates/modification-special-conditions-1a-and-5f-national-grid-gas-plc%E2%80%99s-gas-transporter-licence-facilitate-implementation-capacity-allocation-mechanisms-network-code

The implementation of these changes to the UNC and the Licence have an impact on the Capacity Release Methodology Statements and Capacity Methodology Statements. Consequently, we will be putting forward revised statements to the Authority with a recommended effective date of 1st November 2015 to ensure consistency with the implementation of the CAM Network Code processes.

On the 18th December 2014 we invited all interested parties to comment on potential revisions to the methodology statements through an informal consultation. The feedback we received has assisted us in the further development of the statements.

The main changes that have been made to the statements since the versions last approved are detailed below:

- Entry Capacity Release Methodology Statement:
 - A new section has been added to cover new UNC processes for Interconnection Points being introduced (Modification 0500).
 - Minor changes have been made to existing sections to reflect where existing processes only apply at non-Interconnection Points (Modification 0500).
 - Transitional changes to UNC processes at Bacton ASEP as well as the new Bacton UKCS and Bacton IP ASEPs have been incorporated (Modification 0501V).
 - New Terminology & References relating to processes at Interconnection Points have been incorporated (Modification 0500).
 - It is noted that there will be no mechanism for the release of Incremental Obligated Entry Capacity at Interconnection Points until the Incremental element of CAM is developed and implemented.
 - Minor changes and clarification have been included in response to comments from the Examination that took place at the time of the last consultations.
- Exit Capacity Release Methodology Statement:
 - A new section has been added to cover new UNC processes for Interconnection Points being introduced (Modification 0500).
 - Minor changes have been made to existing sections to reflect where existing processes only apply at non-Interconnection Points (Modification 0500).
 - Details of Transitional arrangements have been for Enduring Annual NTS Exit (Flat) Capacity at Interconnection Points have been included.
 - New Terminology & References relating to processes at Interconnection Points have been incorporated (Modification 0500).
 - It is noted that there will be no mechanism for the release of Incremental Obligated Entry Capacity at Interconnection Points until the Incremental element of CAM is developed and implemented
 - Minor changes and clarification have been included in response to comments from the Examination that took place at the time of the last consultations.
- Entry Capacity Substitution Methodology Statement:
 - New Terminology & References relating to processes at Interconnection Points have been incorporated (Modification 0500).
 - The new Bacton UKCS and Bacton IP ASEPs have been included in the Appendix 1 'Entry Capacity Zones' table (required by Modification 0501V)
 - Clarification of Retainer and refund processes for Retainers taken out at Bacton ASEP
 - It is noted that there will be no mechanism for the release of Incremental Obligated Entry Capacity at Interconnection Points until the Incremental element of CAM is developed and implemented, which means that currently there is no way to trigger substitution to an Interconnection Point.
 - Minor changes and clarification have been included in response to comments from the Examination that took place at the time of the last consultations.

- Exit Capacity Substitution and Revision Methodology Statement:
 - New Terminology & References relating to processes at Interconnection Points have been incorporated (Modification 0500).
 - It is noted that there will be no mechanism for the release of Incremental Obligated Entry Capacity at Interconnection Points until the Incremental element of CAM is developed and implemented, which means that currently there is no way to trigger substitution to an Interconnection Point.
 - Minor changes and clarification have been included in response to comments from the Examination that took place at the time of the last consultations.
- Entry Capacity Transfer and Trade Methodology Statement:
 - Minor updates have been made to reflect that the processes described in the ECTT will no longer apply to Interconnection Points.
 - It is noted that the September 2015 Transfer & Trade process (covering capacity in October 2015) will be the final process that includes the "Bacton ASEP", and that the November 2015 process (for the capacity period December 2015) will be the first that includes Bacton UKCS ASEP (required by Modification 0501V).

Due to the quantity of changes to the statements, tables of changes are attached to this letter as Appendices 1-5. These tables list the main changes proposed, together with a brief explanation.

To assist in reviewing the proposed changes to the capacity statements the following documents are available on our website at <u>http://www2.nationalgrid.com/UK/Industry-information/Gas-capacity-methodologies/Current-Consultations/</u>.

A clean copy of the formal consultation ECR: version 2.2; A comparison of the formal consultation version 2.2 to approved version 2.0.

A clean copy of the formal consultation ExCR: version 10.2; A comparison of the formal consultation version 10.2 to approved version 10.0.

A clean copy of the formal consultation ECS: version 6.2; and A comparison of the formal consultation version 6.2 to approved version 6.0.

A clean copy of the formal consultation ExCS: version 4.2; A comparison of the formal consultation version 4.2 to approved version 4.0.

A clean copy of the formal consultation ECTT: version 7.2; A comparison of the formal consultation version 7.2 to approved version 7.0.

The current approved version of each statement can also be found on the relevant web page.

National Grid would appreciate the comments of all interested parties on the draft changes to the capacity release statements and the capacity statements. Responses should arrive at National Grid by 17:00 on Tuesday 18th August 2015 and be sent by e-mail to:

sarah.lloyd@nationalgrid.com

and copied to box.transmissioncapacityandcharging@nationalgrid.com

Please ensure that a "read receipt" is requested if you wish to confirm that your response has been received.

Alternatively they can be sent by post to the above address marked for the attention of: "Sarah Lloyd" Transmission Network Service – Floor B3

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

Yours sincerely

Steve Fisher Gas Charging and Capacity Development Manager

Appendix 1: Explanation of Proposed Changes to the ECR.

The ECR has been reviewed and proposals to update, and to bring into line with changes to UNC driven by CAM Network Code, are detailed below. Some minor updates and housekeeping changes are not included in the table.

Original Paragraph Number (ECR v2.0)	New paragraph number (ECR v2.2)	Change type	Description
/ /		Title Page and Doci	ument history
Title and	headers	Updated	Document history updated & house-keeping updates
		About this Sta	
N/A	N/A	Minor updates and Sentence deleted	Sentence removed as references to UNC TPD Section Y have been updated within the document so this is no longer applicable. Inclusion of Reservation to recognise this is a key process defined in the statement and UNC.
		General Intro	
4	4	Footnotes and reference added	References to Interconnection Point Capacity added
			Reference to Reservation Parties included.
5	5	Footnotes and reference added	Footnote added to clarify the potential impact of UNC Modification 0519. Footnote added to clarify that there can be no incremental obligated release at Interconnection Point (IP) ASEPs until the development of the Incremental Capacity element of the CAM network code is complete and implemented.
9	9	Minor update	Removal of term developers in favour of 'Reservation Parties' as these are now defined under Reservation Parties earlier in the statement.
10	10	Footnote added	Footnote added to clarify that the paragraph does not apply at IPs
20	20	Minor update	Sentence added to clarify that there can be no incremental obligated release at Exit IPs until the development of the Incremental Capacity element of the CAM network code is complete and implemented.
21	22		Paragraphs 22 and 23 have been reordered
22	21	Paragraphs swapped	to remain consistent with the equivalent ExCR paragraphs which were swapped in accordance with comments from Ofgem at the approval of the last version.
23	23	Minor update	Typographical error corrected
32	32	Minor update	Minor clarification of one word
		Chapter 1: Pr	
39	39	Reference added	Reference to EID Section B added
40	40	Minor update	Minor clarification to reflect that the statement

			is now split into 3 parts.
			Footnote added to clarify that the section
41	41	Footnote added	described does not apply at IPs
40	10		Footnote added to clarify that the section
42	42	Footnote added	described does not apply at IPs
N1/A	40	Now percercab	Addition of an overview of the new Part C
N/A	43	New paragraph	which covers Interconnection Point Capacity.
	Par	t A: Obligated Entry	
	T	Chapter 2: C	
45	46	Minor update	Typographical error corrected
Cha	pter 3: Auction I	Processes for the Re	elease of Obligated Entry Capacity
10	10		Footnote added in response to Examiner
48	49	Footnote added	recommendation to clarify that QSEC Auction
			pricing is different
50	F 4	Deference edded	Sentence added in response to Examiner
50	51	Reference added	recommendation to reference Obligated Entry
			Capacity pricing Footnote added in response to Examiner
			recommendation to clarify which processes
			Obligated Entry Capacity and/or the various
52	53	Minor updates	forms of Incremental Entry Capacity may be
02	00		released. House-keeping updates (years
			within examples updated) and removal of
			outdated information with respect to IPs
50	F 4		Clarification of terminology to reflect the
53	54	Minor updates	licence
			Sentence added in response to Examiner
54	55	Minorundotoo	recommendation to clarify through which
54	55	Minor updates	processes Obligated Entry Capacity is
			released.
			Grammatical error corrected. Footnote
55	56	Minor updates	included to clarify the impact of Bacton split
			on new and existing transfers,
00	04	Minorundotoo	Minor updates in response to Examiner
60	61	Minor updates	recommendation to ensure consistency of
			terms in this section Minor updates in response to Examiner
			recommendation to ensure consistency of
61	62	Minor updates	terms in this section. Updated Licence
			references.
			Minor updates in response to Examiner
63	64	Minor updates	recommendation to ensure consistency of
		•	terms in this section
	1		Clarification in response to Examiner
			recommendation to make clear whether 10%
66	67	Minor Clarification	of Non-incremental Obligated Entry capacity
			is also withheld from reservation and release
			under the PARCA process.
			Updated in response to examiner
74	75	Minor updates	recommendation to ensure consistency with
	N1/A		UNC text
77	N/A		'EU Regulation 715/2009' paragraphs deleted
70	N1/A	Paragraphs	as no longer relevant to the QSEC & AMSEC
78	N/A	Deleted	auctions and CMP processes are now
	Dert	 B: Incromontal Entr	covered in chapter 11
	Fart	B: Incremental Entry	y vapavily release

	Chapter	5: Incremental Obl	igated Entry Capacity		
			Footnote inserted in response to examiner		
			recommendation to consider addressing lead		
86	85	Footnote inserted	times for incremental capacity provided by		
			substitution		
			Sentence added in response to Examiner		
93	92	Reference added	recommendation to reference PARCA pricing		
			Description of PARCA Entry Window and		
95	94	Additional	reference to Ad-hoc QSEC auction added in		
95	94	clarification	response to Examiner recommendation		
			New paragraph moved from Generic Revenue		
N/A	105	New paragraph	Driver Methodology statement (GRD) to ECR		
		1 1 1 1 1 1 1 1 1	in response to a suggestion from Ofgem in		
			their GRD approval letter of 23rd October 2013		
109	109	Reference added	Sentence added in response to Examiner		
100	100		recommendation to reference PARCA pricing		
			Reference added in response to Examiner		
122	122	Reference added	recommendation to include provisions of		
			SC5F Part A		
	Cha	pter 6: Decision Ma	king Methodology		
			Reference to Reservation Parties added in		
400	400	Manager	response to Examiner recommendation to		
130	130	Minor update	clarify that PARCA counter-parties may be		
			users or non-users		
		Updated	Reference to Charging Methodology updated		
136	136	reference			
		Updated	Reference to Charging Methodology updated		
144	144	reference	reference to onarging Methodology updated		
		Tererende	Minor updates in response to Examiner		
		Minor updates	recommendation to clarify which types of		
147	147				
			capacity can be reserved and to reflect the		
			requirements of SC5F Part A		
450	450	Minerundata	Minor update in response to Examiner		
150	150	Minor update	recommendation to include a reference to the		
			proposals made to Ofgem.		
Cl	hapter 7: Increme		y Capacity Pricing Methodology		
156	156	Reference	Updated reference to the Charging		
		updated	methodology		
157	157	Reference	Updated reference to the Charging		
107	107	updated	methodology		
158	158	Minor updates	House-keeping changes (years within		
100	100	winter updates	example updated)		
450	450	Reference	Updated reference to the Charging		
159	159	updated	methodology		
	Chapter		ntry Capacity Release		
179	179	Minor update	Minor clarification of wording		
			Reference to Reservation Parties added in		
			response to Examiner recommendation to		
181	181	Minor update	clarify that PARCA counter-parties may be		
			users or non-users		
	Part C: Interconnection Point Capacity				
	Fd	Chapter 9: C			
N1/A	400 400	Neuranne	New chapter to give overview of		
N/A	186-190	New paragraphs	Interconnection Point Capacity and the		
			purpose of Part C		

Chapte	r 10: Auction Pr	ocesses for the rele	ase of Interconnection Point Capacity
N/A	191-211	New paragraphs	New chapter to cover the release processes for IP Capacity and how the quantities released in each auction are calculated
	Chapte	11: Congestion Ma	nagement Procedures
N/A	212-216	New paragraphs	New chapter to explain how the surrender and withdrawal processes affect registered capacity allocations
Cha	 Inter 9 [.] Non-obli	gated Exit Capacity	Release at interconnection Points
N/A	217-218	New paragraphs	New chapter to clarify that Non-obligated exit capacity may be made available at IPs
	Chapter 10: Inte	erconnection Point (Capacity Pricing Methodology
N/A	219-223	New paragraphs	New chapter to clarify the pricing methodology for IP capacity
	Α	ppendix 1: Example	of the NPV Test
N/A	N/A	Updated	Clarification of terminology and updated example dates
	Арре	endix 2: PARCA Sup	porting Information
N/A	N/A	Minor update	Typographical error corrected.
		Appendix 3: D	efinitions
N/A	N/A	Minor updates	Minor updates and new definitions added primarily relating to IP capacity

Appendix 2: Explanation of Proposed Changes to the ExCR.

The ExCR has been reviewed and proposals to update, and to bring into line with changes to UNC driven by CAM Network Code, are detailed below. Some minor updates and housekeeping changes are not included in the table.

Original Paragraph Number (ExCR v10.0)	New paragraph number (ExCR v10.2)	Change type	Change Description
		Title Page and Docu	ument history
Title and	headers	Updated	Document history updated & house-keeping updates 'NTS removed from title to align to Licence terminology
		About this Sta	
1	1	Minor Amendment	'NTS removed from title to align to Licence terminology
2	2	Minor Updates	Date of application of statement updated
		General Intro	
11	11		Footnote added to clarify that this paragraph does not apply to capacity at Interconnection Points (IPs).
N/A	15	New paragraph	New paragraphs added to cover transitional
N/A	16	New paragraph	arrangements for Enduring Annual NTS (Exit)
N/A	17	New paragraph	Flat Capacity at IPs.
18	21	Footnotes Added	Footnote added to clarify the potential impact of UNC Modification 0519. Footnote added to clarify that there can be no incremental obligated release at Exit IPs until the development of the Incremental Capacity element of the CAM network code is complete and implemented.
N/A	22	New Paragraph	New paragraph added in response to examiner recommendation to clarify the classifications of Incremental Obligated Exit Capacity. Consistent with similar ECR paragraph.
20	24	New footnote	Footnote added in response to examiner recommendation to include further detail regarding the proposal to Ofgem.
21	25	Minor update	Typographical error corrected
25	29	Minor update	Updated to account for new UNC EID definitions
	apacity Licence	Minor update	Alignment of title to Licence Terminology
	Diagram: NTS Exit Capacity UNC Terms		Existing diagram amended slightly and new diagram added to cover new capacity terminology from UNC EID
31	35	Minor clarification	Removal of wording regarding 'application' since Obligated Exit Capacity may now be released via means other than an application at an IP.
36	40	Minor update	Minor wording change to be consistent with

			the equivalent ECR paragraph which was		
			changed following comments from Ofgem in		
			their last approval letter.		
		Chapter 1: Pri			
			Addition of references to UNC EID Capacity		
39	43	Minor updates	Terminology and classifications of IP Capacity		
41	45	Minor updates	Minor clarification to reflect that the statement is now split into 2 parts.		
N/A	46	New Paragraph	Addition of an overview of the new Part B which covers Interconnection Point Capacity.		
42	47	Minor Updates	Minor clarification to include Interconnection Point capacity		
		Part A: Exit Capad			
Chapt	er 2. Procedure		ring Annual NTS Exit (Flat) Capacity		
			New footnote added to clarify that the		
43	48	New footnote	described process is not applicable to IPs		
44	49	New footnote	New footnote added to clarify transitional arrangements for Enduring Capacity at IPs		
			Added in response to examiner		
N/A	52	New Paragraph	recommendation to include a reference to		
11/7	52	New Falagiaph	pricing arrangements for Enduring Annual		
			NTS Exit (Flat) Capacity		
	Increases t	o Enduring NTS Exit			
48	54	Footnote added	Footnote added to clarify processes for IPs		
49	55	Footnote added	Footnote added to clarify processes for IPs		
57	63	Minor update	Addition of a clause for IPs		
58	64	Minor clarification	Clarification that Capacity may be released		
50			via means other than an application at an IP.		
	Planning and Advanced Reservation of Capacity Agreements				
66	72	Additional clarification	Description of PARCA Exit Window added in response to Examiner recommendation		
N/A	77	New paragraph	New paragraph moved from Generic Revenue Driver Methodology statement (GRD) to ExCR in response to a suggestion from Ofgem in their GRD approval letter of 23 rd October 2013		
72	79	Reference added	Reference added in response to Examiner recommendation to include provisions of SC5G Part A		
		Annual Application	on Window		
79	86	Reference added	Reference to paragraph 24 added in response to Examiner recommendation to include provisions of SC5G Part A		
80	N/A	Deleted	Unused paragraph deleted		
		2010100	Paragraph added in response to Examiner		
N/A	87	New paragraph	recommendation to include rationing mechanism for competing demands in an Annual Application Window		
		EU Regulation	715/2009		
83	N/A		'EU Regulation 715/2009' paragraphs deleted		
		Paragraphs	as no longer relevant to the Annual		
84	N/A	Deleted	Application Window and CMP processes are now covered in chapter 8		
A	oplications Outsid	e the Annual Applicat	tion Window (Ad-hoc Applications)		
			Minor clarification in response to examiner		
85	90	Minor update	recommendation to consider that an ad-hoc		

		application is made by a single User
	1	Minor clarification in response to examiner
91	Minor update	recommendation to consider that an ad-hoc
		application is made by a single User
		Reference added in response to Examiner
94	Reference added	recommendation to include process for
34	Reference added	
05	Minor derification	Ofgem proposal/veto
		Minor clarification of wording used
		Typographical error corrected
Reductions to	Enduring Annual NTS	
116	Footnote added	Footnote added to clarify transitional
		arrangements for IPs
117	Footpote added	Footnote added to clarify transitional
117		arrangements for IPs
		Reference added to clarify that this paragraph
400	Defense edded	is only for reduction requests received in
123	Reference added	response to an ad-hoc invitation from Nationa
		Grid.
	User Comm	
		Removal of process for IPs since this is
126		superseded by transitional arrangements
120	paragraph	(where User Commitment applies)
100	Footpoto oddod	Clarification that this is not true for IPs
Ovenapp		
	Capacity Release	
		Footnote added in response to examiner
152	Footnote added	recommendation to address lead times for
		capacity from other sources
Cha	pter 3: Annual NTS E	
		Paragraph added in response to Examiner
161	New paragraph	recommendation to include reference to
101		pricing arrangements for Annual NTS Exit
		(Flat) Capacity
		Paragraph added in response to Examiner
		recommendation to include reference to
162	New paragraph	rationing arrangements for Annual NTS Exit
		(Flat) Capacity
<u> </u>	ELL Pequilation	
NI/A		6 'EU Regulation 715/2009' paragraphs deleted
IN/A	Baragrapha	as no longer relevant to the Annual
N1/A	.	
N/A	Deleted	Application Window and CMP processes are
_		now covered in chapter 8
Ch	apter 4: Daily NISE	
		Paragraph added in response to Examiner
166	New paragraph	recommendation to reference the Daily
1		reserve prices
+ + + + + + + + + + + + + + + + + + + +		
		Paragraph added in response to Examiner
168	New paragraph	recommendation to reference the Daily
168	New paragraph	recommendation to reference the Daily
168	New paragraph	
		recommendation to reference the Daily reserve prices
	art B: Interconnection	recommendation to reference the Daily reserve prices n Point Capacity
		recommendation to reference the Daily reserve prices n Point Capacity
	94 95 101 Reductions to 116 123 123 126 126 136 Overlapp 152 Cha 161 161	94 Reference added 95 Minor clarification 101 Minor update Applications from Res Reductions to Enduring Annual NTS 116 Footnote added 117 Footnote added 118 Footnote added 119 Reference added 123 Reference added 123 Reference added 126 Removal sub paragraph 136 Footnote added Overlapping Applications for In Bi-directional Co Capacity Release 152 Footnote added 161 New paragraph 162 New paragraph 162 New paragraph

			purpose of Part B
0			
Chapt	ter 7: Auction Pro	ocesses for the relea	ase of Interconnection Point Capacity
			New chapter to cover the release processes
N/A	184-202	New paragraphs	for IP Capacity and how the quantities
			released in each auction are calculated
	Chapte	r 8: Congestion Mar	nagement Procedures
			New chapter to explain how the surrender an
N/A	203-207	New paragraphs	withdrawal processes affect registered
			capacity allocations
Ch	apter 9: Non-obli	gated Exit Capacity	Release at interconnection Points
N/A	208-209	New paragraphs	New chapter to clarify that Non-obligated exit
11,77	200 200		capacity may be made available at IPs
	Chapter 10: Inter	erconnection Point (Capacity Pricing Methodology
N/A	210-214	New paragraphs	New chapter to clarify the pricing
11/7	210 214		methodology for IP capacity
		Appendix 1: Exit	
N/A	N/A	Updated	Updated information
	Арре	endix 2: PARCA Sup	porting Information
N/A	N/A	Minor update	Typographical error corrected.
		Appendix 3: D	efinitions
N/A	N/A	Minor updates	Minor updates and new definitions added primarily relating to IP capacity
	1		

Appendix 3: Explanation of Proposed Changes to the ECS.

The ECS has been reviewed and proposals to update, and to bring into line with changes to UNC driven by CAM Network Code, are detailed below. Some minor updates and housekeeping changes are not included in the table.

Original Paragraph Number (ECS v6.0)	New paragraph number (ECS v6.2)	Change type	Description
		Title Page and Docu	ument history
Title and	headers	Updated	Document history updated & house-keeping updates
		About this Sta	atement
N/A	N/A	Minor Updates	Housekeeping updates and footnotes added to clarify where current terminology in the statement incorporates Technical Interconnection Point Capacity and Interconnection Points
		Conorol Intro	duction
		General Intro	
			Clarification of terminology in response to Examiner recommendation.
4	4	Updated	Clarification incorporated that since there can be no incremental release at IPs until the development of the incremental element of CAM is complete and implemented, there can be no way of triggering substitution to an IP.
15	15	Minor Updates	Updated in response to Examiner recommendation to better align to licence text.
		Chapter 1: Pri	
		Chapter 2: Met	
22	22	Updated	Updated to explain that Capacity withheld from IPs in Annual Yearly Auctions will not be substitutable. Footnote added to part (h) to clarify that capacity that has been sold and subsequently recalled will be considered as substitutable. Footnote removed from part (i) since only relevant prior to the effective date of this
			statement
25	25	Updated	Updated to cover
26	26	Minor updates	References to the Annual Yearly Auction included
	1	Capacity Ret	
30	30	Housekeeping updates	Updated years in the examples
32	32	Minor update	Reference to Annual Yearly auction included
33	33	Footnote added	Footnote added to clarify procedure if a retainer has been taken out at Bacton ASEP prior to it being split
35	35	Minor update	Reference to Annual Yearly auction included
37	37	Minor update	Reference to Annual Yearly auction included

1 1/7 1	1 1/7 \		
N/A	<u>Арре</u> N/А	Minor update	Typographical error corrected.
	۵nn	endix 3: PARCA Sup	porting Information
N/A	N/A	Updated	Dates & data updated, reference to Annual Yearly auction added and footnote included to explain that data is not yet available for Bacton UKCS ASEP or Bacton IP ASEP.
		Appendix 1: Entry C	apacity Zones
90	91	Minor update	Typographical error corrected
89	90	Footnote added	Clarification of substitution from an IP where there is both Bundled and Unbundled Capacity available.
87	88	Minor updates	Minor updates to remain consistent with the equivalent ExCS paragraph which was edited in accordance with comments from Ofgem at the approval of the last version.
N/A	87	New paragraph	Reference to Generic Revenue Driver added following examiner recommendation to ensure partial substitution is up to date and consistent across the ECS and ExCS.
70	70	Reference added	Reference to Transmission planning code added following examiner recommendation
62	62	Updated	Updated to reflect that Revenue Drivers have been removed from the licence and new revenue drivers would not be calculated until after substitution analysis has occurred meaning that they can no longer be used to determine the recipient ASEP order.
61	61	Reference added	Reference to the values in Appendix 1 added following Examiner recommendation
		Analysi	
58	58	Minor update	Reference to Annual Yearly auction included
57	57	Minor update	Reference to Annual Yearly auction included
54	54	Minor update	References to IP auctions included
53	53	Minor updates	Example years updated and example extended to cover retainers taken out at IPs
52	52	Housekeeping updates	Updated years in the examples
51	51	Minor updates	References to IP auctions included, example years updated and example extended to cover retainers taken out at IPs
50	50	Minor updates	Reference to Annual Yearly auction included and example years updated

Appendix 4: Explanation of Proposed Changes to the ExCS.

The ExCS has been reviewed and proposals to update, and to bring into line with changes to UNC driven by CAM Network Code, are detailed below. Some minor updates and housekeeping changes are not included in the table.

Original Paragraph Number (ExCS v4.0)	New paragraph number (ExCS v4.2)	Change type	Description			
	Title Page and Document history					
Title and	l headers	Updated	Document history updated & house-keeping updates			
		About this Sta	atement			
N/A	N/A	Minor Updates	Housekeeping updates and footnotes added to clarify where current terminology in the statement incorporates Technical Interconnection Point Capacity and Interconnection Points			
		Conorol Intro	Effective Date updated - housekeeping			
		General Intro	Clarification incorporated that since there can			
4	4	Updated	be no incremental release at IPs until the development of the incremental element of CAM is complete and implemented, there can be no way of triggering substitution to an IP.			
14	14	Minor Updates	Updated in response to Examiner recommendation to better align to licence text.			
	Chapter 1: Principles					
	Cł	napter 2: Exit Capac				
22	22	Minor Updates	Addition of new Interconnection Point terminology and removal of outdated Technical Capacity information.			
			Years updated in the footnote 13 example.			
24	24	Minor Updates	Clarification that User Commitment applies to increases in Enduring Annual NTS Exit (Flat) Capacity			
25	25	Minor changes	Inclusion of bids as a way of obtaining existing unsold Exit Capacity (with respect to Interconnection Point Capacity)			
26	26	Minor changes	Inclusion of bids as a way of obtaining existing unsold Exit Capacity (with respect to Interconnection Point Capacity)			
27	27	Minor Updates	Updated in response to examiner recommendation to make the wording more specific.			
32	32	Updated	Updated to reflect that Revenue Drivers have			
33	N/A	•	been removed from the licence and new			
34	N/A	Paragraphs Deleted	revenue drivers would not be calculated until after substitution analysis has occurred meaning that they can no longer be used to determine the recipient NTS Exit Point order.			
48	46	Minor change	Updated for consistency with the ECS which was updated in response to examiner recommendation to be more specific.			

50	48	Minor change	Updated in response to examiner comment to reference the Transmission Planning Code.
73	71	Minor Updates	Updated in response to examiner recommendation to have more consistency between the two substitution methodologies and also to reflect that there is a Generic Revenue Driver Methodology now that covers these areas.
74	72	Minor change	Updated reference to ExCR
78	76	Minor change	Typographical error corrected
		Chapter 3: Exit Cap	acity Revision
86	84	Minor change	Terminology correction
96	94	Minor change	Updated in response to examiner comment to reference the Transmission Planning Code.
	Annex 1: Indica	tive Gas Flow Dire	ction in the NTS for each LDZ
N/A	N/A	Updated	Housekeeping changes (date) & updated diagrams
	Ann	ex 2: PARCA Supp	orting Information
N/A	N/A	Minor update	Typographical error corrected.

Appendix 5: Explanation of Proposed Changes to the ECTT.

The ECTT has been reviewed and proposals to update, and to bring into line with changes to UNC driven by CAM Network Code, are detailed below. Some minor updates and housekeeping changes are not included in the table.

New paragraph number (ECTT v7.2)	Change type	Description
Title Page and Document history		
headers	Updated	Document history updated & house-keeping updates
About this Statement		
N/A		house-keeping updates – effective date
General Introduction		
4	Footnote Added	To clarify that this methodology does not apply to Interconnection Point Capacity at IP ASEPs
Chapter 1: Principles		
9	Sentence and footnote added	Sentence: Further clarification that this methodology does not apply to Interconnection Point Capacity at IP ASEPs Footnote: clarification of the impact of Bacton Split on T&T processes and what ASEPs are included in the process and when.
Chapter 2: Methodology		
29	Minor update	The example previously contained 'Bacton', this has been updated to 'Bacton UKCS'
36	Minor update	The example previously contained 'Bacton', this has been updated to 'Bacton UKCS'
N/A	Updated	Updated with new data
Appendix 2: Worked Example of Exchange Rate Calculation		
N/A	Minor update	The example previously contained 'Bacton', this has been updated to 'Bacton UKCS'
	paragraph number (ECTT v7.2) headers N/A 4 9 9 29 36 29 36 Appendix 2: V	paragraph number (ECTT v7.2) Change type Title Page and Docr Title Page and Docr About this State About this About this State About this A