

ERGEG Gas Focus Group/Storage TF

Guidelines for Good Practice for Gas Storage System Operators (GGPSSO)

Questionnaire for SSOs

8 February 2006

Introduction

On 15 September 2005, during the 10th Madrid Forum, ERGEG presented the preliminary results of its first monitoring exercise on the implementation of the GGPSSO. The Forum asked ERGEG to produce a follow-up report for the 11th Madrid Forum, to be held in May 2006. On 7 December 2005, ERGEG published the final results of its report on "Monitoring the implementation of the GGPSSO". In parallel, ERGEG proposed to undertake a second monitoring exercise assessing the effectiveness of the GGPSSO, and the functioning of the market for storage services.

The objective of this questionnaire is to collect information from SSOs to assist in monitoring the implementation of the GGPSSO as requested by the European Commission.

The deadline for the completion of the questionnaire is **8 March 2006**.

In order to ensure that all interested parties are consulted, ERGEG members will be required to prepare a contribution to be included in the report. Storage users will be consulted from May 2006, to gather their feedback on the implementation of the GGPSSO requirements after 1 April 2006. Their views will be particularly important in assessing implementation of the GGPSSO.

ERGEG intends to publish an initial report on the implementation of the GGPSSO in May 2006 and it expects to present its findings at the next Madrid Forum. ERGEG will issue a final report on implementation after it has an opportunity to consider responses to its initial report.

To help ensure transparency, responses to the questionnaire and other documents associated with the GGPSSO will be published on the ERGEG website. Any requests to keep information confidential will be considered in accordance with the relevant section of the GGPSSO that deals with the publication of the information. If you want any information to be treated as confidential this should be objectively justified and outlined clearly – taking into account the requirements of the GGPSSO. Any information that is to be treated as confidential should be placed in a separate appendix.

Please note that in order to allow for maximum common understanding of data, the answers provided by SSOs will be reviewed by the national regulatory authority.

Given that ERGEG's initial report will be published in May, SSOs may provide an addendum to their original submission if there are any significant changes to the information that they provide, between 8 March and 5 April. This will ensure that the report is as up to date as possible and avoid misrepresenting the position of the SSOs, taking into account that the deadline for implementing some of the GGPSSO requirements is 1 April 2006.

[Please insert name, authority, phone number, email address]

Questionnaire

1 General

1.1 Business name of respondent: National Grid LNG Storage

2 Roles and responsibilities of Storage System Operators

2.1 Has the standard storage contract/storage code been developed in proper consultation with users (e.g. bilateral contacts, open consultation process, with some sort of public announcement, consultation process supervised by relevant national regulatory authority or other)? Please specify when users were last consulted (relating to GGPSSO 1.2.b):

Yes, it is included in the Uniform Network Code. Some time since last consulted on, but any Shipper has the right to raise a Modification Proposal to change the terms at any time. Acceptance / rejection of a change is by the National Regulatory Authority.

3 Necessary TPA services

3.1 If the figure for “available capacity” for your storage facility¹ is “0”, please specify until when (relating to GGPSSO 3.1):

Capacity will be available from 1st May 2006, following the annual tender process held in March.

3.2 There may be some available capacity now (date of reference 8 March 2006). However, all the capacity may have been booked in advance, which means that sometimes in the future, there will be no capacity available. If this is the case, please specify when and for how long (relating to GGPSSO 3.1):

The majority of our capacity is sold via an annual tender, the tender is held in March each year for capacity for the period May to April. This is currently ongoing. The remainder (6%) was offered on a 2 year basis from 2006/07 and 2007/08 during April 2005.

3.3 Please provide the link to your web pages presenting the commercial terms that you apply and in particular services offered (both the Directive² and the GGPSSO 6.4.a&b provide that this information is to be published). If you wish to be more specific, please use the space below (relating to GGPSSO 3.3):

<http://www.nationalgrid.com/uk/Gas/Ingstorage/Auctions/>
http://www.gasgovernance.com/docs/02_23_TPDZ.pdf

¹ Storage facility means a facility used for the stocking of natural gas and owned and/or operated by a natural gas undertaking, including the part of LNG facilities used for storage but excluding the portion used for production operations, and excluding facilities reserved exclusively for transmission system operators in carrying out their functions (Article 2.9 of Directive 2003/55/EC).

² Article 19.3 of Directive 2003/55/EC of 26 June 2003 concerning common rules for the internal market in natural gas and repealing Directive 98/30/EC

3.4 Do you offer the following services on the primary market (GGPSSO 3.3, 3.5, 3.7):

	yes	no
(a) bundled services (SBU) of space and injectability/deliverability	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) unbundled services supplementing SBUs at least for available storage capacity at the beginning of the storage year ³	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) long-term (>1 year) services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) short-term (<1 year) services ⁴	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) interruptible services ⁵ (injection & deliverability only)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f) a service which includes an obligation for the SSO to allocate the gas which has been nominated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g) injection and withdrawal are possible at any time	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Note: Injection & withdrawal are commercially possible at all times, but may be physically achieved via a counter-nomination.		

3.5 If any of these services (please specify) has not been introduced, please explain why:

Design of facilities is such that less than annual services commercially and technically impractical. Facilities were designed as peak shaving plant and to take ~ 6 months to fill and 5 days to empty.

3.6 Please specify if services offered have been developed with consultation of storage users to take into account market demand. When were users last consulted (relating to GGPSSO 3.4.a):

Yes, included in the Uniform Network Code. Some time since last consulted on, but any Shipper has the right to raise a Modification Proposal to change the terms at any time. Acceptance / rejection of a change is by the National Regulatory Authority.

4 Storage capacity allocation and congestion management

4.1 Please provide a description of the capacity allocation mechanism that you apply. Please specify if there is an order of priority and for which customers (relating to GGPSSO 4.1):

Pay as bid auction, allocated on price. TSO has pre-emption rights for capacity used for operational purposes.

4.2 In case of contractual congestion, what kind of solution do you apply or plan to apply (GGPSSO 4.2)?

Highest price allocated first. Pro-rate bids of equal price if cannot completely allocate.

4.3 In case of physical congestion, what kind of solution do you apply or plan to apply (GGPSSO 4.2)?

Physical congestion can only occur for injection & withdrawal. In both cases first step is removal or scale back of overruns on a pro-rata basis. If firm rights are curtailed compensation is paid.

³ You may provide an addendum before 5 April 2006.

⁴ You may provide an addendum before 5 April 2006.

⁵ You may provide an addendum before 5 April 2006.

- 4.4 In case of congestion, is there a system to balance the portion of storage capacity contracted under long-term contracts and short term contracts? Please specify the nature of these arrangements (GGPSSO 4.2.c):

Only 6% of capacity has been offered long term (2 years), this capacity has been sold on a firm basis and is not curtailed if there is congestion in the annual auction process.
Equal treatment for injection & withdrawal congestion.

5 Confidentiality requirements

- 5.1 Are the following items explicitly mentioned in the code of conduct/compliance programme (relating to GGPSSO 5.1.b):

	yes	no
(a) prohibition on SSO staff passing commercially sensitive information to other parts of any affiliate of the company in advance of being provided to all market participants	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) databases related to storage operations kept separate	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) new IT systems for the storage business developed separately	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 5.2 Please specify if there are other important items in the code of conduct/compliance programme:

National Grid does not have a Gas Supply Business in Europe.

- 5.3 Is the code of conduct/compliance programme published? If yes, provide a copy / internet link:

	yes	no
	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Code of Conduct is not currently published, but we are considering including on our web-site.		

- 5.4 Is there a compliance officer supervising that the compliance programme is effectively implemented (GGPSSO 5.1.b)?

	yes	no
	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 5.5 If other arrangements are in place to protect the confidentiality of information, please provide details below (relating to GGPSSO 5.1):

6 Transparency requirements

- 6.1 Please provide the link to the webpages presenting the information required by the GGPSSO in the transparency requirements (relating to GGPSSO 6.1):

http://www.gasgovernance.com/docs/02_23_TPDZ.pdf (6.4, 6.5e, 6.6a)

<http://www.nationalgrid.com/uk/Gas/Ingstorage/Auctions/> (6.4a, 6.6a)

National Grid: UK: Gas: Site Capacity (6.5a)

National Grid: UK: Gas: NTS Entry End of Day Flow (6.5b flows)

<http://www.nationalgrid.com/uk/Gas/Data/dsr/> (6.5b – utilisation)

http://www.gasgovernance.com/docs/02_12_TPDK.pdf (6.6b)

<http://www.nationalgrid.com/uk/Gas/Ingstorage/What/> (6.5d)



"LNG Cost
Calculator 2005 6.:

This file is available on request. (6.5c)

- 6.2 Please specify how the historical utilization rate is calculated (relating to GGPSSO 6.5.b):

Historical utilization rate is calculated based on current stock for the start of a gas day, plus storgae injection minus withdrawn quantities

- 6.3 If you have not published information as required by the GGPSSO about the aggregate use of storage, did you notify the relevant national regulatory authority (GGPSSO 6.3)?

	yes	no
N/A	<input type="checkbox"/>	<input type="checkbox"/>

- 6.4 Please specify how many users – if any – requested, via a correspondence, that you do not publish information about the aggregate use of storage (period of reference: 15 March 2006 – 15 March 2007) (relating to GGPSSO 6.2)?

None

7 Secondary markets

- 7.1 How many system users trade capacity rights on the secondary market (period of reference: 15 March 2005 – 8 March 2006⁶)?

41 trades by 8 counterparties

⁶ You may provide an addendum before 5 April 2006.

7.2 Please indicate if you:

	yes	no
(a) allow for title transfer for both bundled and unbundled capacities (GGPSSO 9.1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) allow the new owner to aggregate such storage capacity operationally (GGPSSO 9.1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7.3 Are registered users allowed to trade gas-in-store?

	yes	no
	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7.4 Please provide a description of rules applicable for storage capacity trade on the secondary market vis-à-vis the SSO (GGPSSO 9.1):

Storage Users may trade bundled or unbundled storage capacity as well as gas in store. They must notify National Grid LNG Storage of the trade and are then treated for operational purposes as the capacity holder. The traded capacity is combined with their primary capacity for operational purposes, but the original holder continues to be charged for the capacity holding.

7.5 Please provide a copy of the clauses in the storage code/contract referring to or addressing secondary storage capacity trading explicitly (relating to GGPSSO 9.1):


"UNC Z4 STORAGE
TRANSFERS.doc"

Appendix

Definitions

Available storage capacity means the part of the technical storage capacity that is not contracted or held by storage users at that moment and still available to the storage users for firm and interruptible services, and is not excluded from TPA under Article 2(9) of the Gas Directive (Definition 1 of the GGPSSO)

Storage capacity is space (expressed in normal cubic meters or energy), injectability and deliverability (expressed in normal cubic meters or energy per time unit). All of them can be firm or interruptible (Definition 17 of the GGPSSO)

Storage facility means a facility used for the stocking of natural gas and owned and/or operated by a natural gas undertaking, including the part of LNG facilities used for storage but excluding the portion used for production operations, and excluding facilities reserved exclusively for transmission system operators in carrying out their functions (Definition 18 of the GGPSSO)

Technical storage capacity is the maximum storage capacity (injectability, deliverability and space) that the SSO can offer to storage users, excluding storage capacity for SSOs operational needs