IME3 Compliance for 2015

Gas Day Transition

Business Rules for Industry Consultation

Version 1.0

1st December 2014

premier TRANSMISSION

belfast gas TRANSMISSION

BGE (Northern Ireland)

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1. Introduction

1.1. This document sets out the Business Rules for the change to the definition of 'Day' in the NI Regime, from 1st October 2015.

1.2. It is necessary for Northern Ireland to comply with EU Regulations, specifically the IME3 Regulation EC 715/2009, and the Network Codes which have been/are being implemented as a consequence of that Regulation.

1.3. The Capacity Allocation Mechanisms Code (EU 984/2013) defines the 'gas day' as starting at 05:00, whereas at present the 'Day' is defined in the NI Codes as starting at 06:00.

1.4. Although CAM is only applicable to Interconnection Points (IPs), the gas day definition is applicable to all EU Network Codes including the Balancing Code (EU 312/2014), which has to operate across the whole NI Network. It would not be feasible to operate a different Day at entry points from that at exit points. The change will therefore be applied across the NI Network.

1.5. These Business Rules therefore cover the change in the definition of 'Day' in the NI Network. They describe operational and commercial analysis of the changes, the impacts identified and the transition plan for implementation into the Codes for all of the NI TSOs (PTL, BGTL and BGE(NI)).

1.6. These Business Rules will be developed into a Code Modification Proposal. If approved the change will take effect from 05:00 on 1st October 2015.

2. Relevant Context

2.1. The following points are key elements of relevant context for these Business Rules:

a) The current 'Day' as defined in the NI Codes operates 06:00 to 06:00 UTC under the Gas (Calculation of Thermal Energy) Regulations 1996 (as amended);

b) Compliance with the CAM Regulation (EU 984/2013) is required for 1st November 2015;

c) The CAM Code defines 'gas day' as the period from 5:00 to 5:00 UTC the following day for winter time and from 4:00 to 4:00 UTC the following day when daylight saving is applied

d) Although CAM only applies to IPs, the definition is applicable to all EU Network Codes

e) The transition plan has been developed in conjunction with National Grid and Gaslink.

3. Contractual review

3.1. The NI TSOs have reviewed all systems, processes and related contracts to identify timing dependencies and will implement the required changes for 1st October 2015.

3.2. The NI TSOs recommend that Shippers carry out their own analysis in relation to their business processes to identify areas that may require change.

Items that sit outside of the Network Code and the scope of this consultation that may require analysis include:

- Meter validation/telemetry equipment/metering equipment
- Demand forecasting/estimation
- Data flows and exchange
- Timings of business transactions
- Employment contracts
- IT systems

4. Code Analysis

4.1. An Initial Assessment of Code References in the PTL Transportation Code, the BGTL Transportation Code and the BGE (NI) Transportation Code was carried out. This showed that whilst there are a number of references to process timings within the Codes, it is not necessary to change the times at which any processes are to be carried out during the day as a result of this change to the definition of the Day. Only clauses in the Codes which specifically refer to 06:00 will need to be amended, and these are mostly in the 'defined terms' section of the Codes.

4.2. In the Nominations Business Rules, the NI TSOs have proposed to amend the timings for submission of Exit Nominations and Renominations to align with the timings for IP Entry Nominations. These time changes are not within the scope of these Business Rules[1].

4.3. The table below summarises the number of references to timings in each Code, and also the number of those where changes are required:

[1] Although they are included in the number of timing references identified in the table in 4.3

Code	Topic	No of Timing References	No of References requiring change as a result of the change to the definition of Day
PTL	Nominations	20	1
	Allocations	8	1
	Measurement and Testing	4	0
	Defined Terms	7	7
BGTL	Interpretation – times and dates	13	13
BGE(NI)	Nominations	24	0
	Allocations	5	0
	Measurement and Testing	3	0
	Defined Terms	9	7

4.4. Process times and definitions which refer to the start or end of the gas day (06:00) will require modification. These items that require change are discussed below.

5. Proposed Changes

5.1 One reference to Nominations in the PTL Code, which is a reference to a time which is the start of the gas day, will need to be revised, as follows:

2.13.2 A Profile Nomination submitted in accordance with section 2.12.1 (d) shall:

(a) be submitted no later than 25 minutes past the start of the next hour after which each Belfast Gas Exit Point No 2 Nomination, Belfast Gas Exit Point No 3 Nomination and Belfast Gas Exit Point No 4 was submitted and specify the aggregate profile nomination at Carrickfergus Connected Systems Point. The Downstream System Operator may revise any such Profile Nomination submitted on Day D by submitting a further Profile Nomination to Premier Transmission no later than 80 minutes past the start of the next hour after which the relevant Belfast Gas Exit Point No 2 Nomination or Belfast Gas Exit Point No 3 Nomination was submitted;

(b) be in the Prescribed Form;

(c) be submitted in accordance with section 20.1;

(d) be revised by the submission of a revised Profile Nomination by 18:00 on D-1 if by that time the Downstream System Operator are aware that the profile requirement has changed;

(e) be revised by the submission of a revised Profile Nomination by 0~~6~~5:00 on Day D if by that time the Downstream System Operator are aware that the profile requirement has changed;

5.2 One reference to Allocations in the PTL Code, which is a reference to a time which is the start of the gas day, will need to be revised as follows:

3.6.2 A Reallocation may only be requested, subject to 3.8:

(a) at an Exit Point other than Belfast Gas Exit Point No 1;

(i) by all Shippers whose allocations would change as a result of any such Reallocation writing jointly to Premier Transmission;
(ii) during the period between the commencement of D+1 and 16:00 on D+5;

(b) at Belfast Gas Exit Point No 1;

(i) by Phoenix on behalf of Shippers at Belfast Gas Exit Point No 1;
(ii) during the period between 0~~6~~5:00 on the on the first Business Day and 16:00 hours on the fifth Business Day of the next subsequent calendar month;

5.3 There are 7 references in 'Defined Terms' in the PTL and BGE(NI) Codes to time periods which will need to be changed as they define the start of the gas day. The main defined terms will be modified as follows to accomplish the changes required:

"Day" or its abbreviation "D" means a period beginning at 0~~6~~5:00 hours on any day and ending at 0~~6~~5:00 hours on the following day[2];

"Gas Year" means the period of time beginning at 0~~6~~5:00 hours from 1 October of any calendar year to 0~~6~~5:00 hours on 1 October of the next succeeding calendar year;

"Month" means a period beginning at 0~~6~~5:00 hours on the first day of any calendar month and ending at 0~~6~~5:00 hours on the first day of the next succeeding calendar month and the term "Monthly" shall be construed accordingly;

"Quarter" shall mean a period of three (3) Months, with each successive Quarter commencing at 0~~6~~5:00 hrs on 1 October, 1 January, 1 April and 1 July respectively;

5.4 There are 13 references in Defined Terms in the BGTL Code in relation to 'Interpretation-times and dates' which refer to a time which is the start of the gas day. The terms will be revised as follows:

[2] Please note that the definition of Gas Flow Day incorporates the definition of Day, and does not otherwise refer to a time so it will not need to be changed. The definition is: "***Gas Flow Day***" *means, in relation to the application of any provision of the Code, the Day in relation to deliveries, offtakes or flows of gas or other operations on which such provision is to apply;*

3.1 For the purposes of the Code:

(a) "Business Day" means a Day other than a Saturday or a Sunday, or a Day which begins at 0~~6~~5:00 hours on a bank holiday in Northern Ireland;

(b) "Day" means the period from 0~~6~~5:00 hours on one day until 0~~6~~5:00 hours on the following day;

3.2 Unless the context otherwise requires, a reference in the Code:

(a) to a calendar day (such as 1st January) or a day of the week (such as Sunday) is to the Day which begins at 0~~6~~5:00 hours on that day;

(b) to a week is to the period from 0~~6~~5:00 hours on a day until 0~~6~~5:00 hours on the 7th day following;

(c) to a month (or a number of months) is to the period from 0~~6~~5:00 hours on a day in one month until 0~~6~~5:00 hours on the same day of the month which follows (or follows by the relevant number of months), or if there is no such day in such month 0~~6~~5:00 hours on the first day of the next following month;

(d) to a calendar month is to the period from 0~~6~~5:00 hours on the first day of a month until 0~~6~~5:00 hours on the first day of the following month, and references to a particular calendar month (such as January) shall be construed accordingly;

(e) to a year is to the period from 0~~6~~5:00 hours on a day in one year until 0~~6~~5:00 hours on the same day (or where the day in the first year was 29th February, on 1st March) in the following year;

6 Transition Details

6.1 Transition Plans will be aligned with National Grid and Gaslink.

6.2 The change will be effective for Gas Flow Days starting from 1st October 2015 to coincide with the start of the Gas Year.

6.3 Gas Flow Day 30th September 2015 will be a 23 hour day to allow the Gas Flow Day change to start 1st October at 05:00 UTC[3]. On this day Shippers will be allocated for 23 hours rather than the usual 24 hours. The process will be similar to when clocks go forward currently.

[3] UTC is the successor to the term Greenwich Mean Time, and refers to 'Universal Time Coordinated'

7 Consultation Questions

Shippers and other interested parties are invited to give their views on any aspects of these Business Rules.

Responses, and/or part of responses, may be marked as confidential and will be treated accordingly.

8 How to respond

Shippers wishing to respond to this document are requested to provide their views on or by **5th January 2015.** Responses may be made in writing or by email, or directly to the TSOs.

Written responses should be provided to:

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