

## Workshop 1: Gas SCR draft policy decision

# How cash-out reform could be implemented

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#### Where are we in the process?

- 11 Jan 2011: Initial consultation released
  - Jan to April 2011: Consultation on the initial consultation
- 8 Nov 2011:Draft policy decision and draft impact assessment released
  - 29 Nov 2011: Opening seminar
  - 13 Dec 2011: Workshop 1
  - 23 Jan 2012: Workshop 2
  - 31 Jan 2012: Closing date for responses
  - 15 Feb 2012: Workshop 3 (code and licence changes)
  - 29 Feb 2012: Workshop 4 (code and licence changes)
  - 14 March 2012: Closing seminar
- Spring 2012: Release final decision and impact assessment

#### Purpose of today's workshop

- To discuss how our proposed cash-out reform might be implemented
  - Including initial issues and difficulties that we have identified
- This does not mean we are going forward with our proposals irrespective of the consultation responses we receive
  - But without working out how our proposals could be implemented we will not be able to assess whether they will be workable

### Plan for the day

- 9:30 10:00 Ofgem presentation
  - The key issues identified in working through how to implement cash-out reform
- 10:00 12:00 Breakout discussion sessions
  - Breakout session 1: The cash-out process
  - Breakout session 2: Neutrality and payments for DSR services
- 12:00 12:30 Feedback from breakout sessions

#### This presentation

- Recap on our draft policy decision
- Overview of:
  - Current timescales for balancing and credit
  - Current balancing process
  - How we account for daily metered (DM) and non-daily metered (NDM) customer volumes
  - How neutrality works
- Introduction to the issues we will be discussing today
  - Group 1: the cash-out process whether to have a near-time or post event process and related issues
  - Group 2: payment for interrupted customers how to redistribute funds and how to deal with payments for DSR services

#### Recap on the draft policy decision

- The Authority is minded to pursue option 4 to:
  - Implement cash-out reform capped at one day's domestic Voll
  - Recommend more consideration of possible further interventions alongside cash-out reform
- Further interventions work will now be carried out through a separate project
  - However, stakeholders can share their views on further interventions when responding to the draft policy decision

#### **Current balancing and credit timescales**

- Close out date for information is at a month plus 15 working days (M+15)
- Imbalance is known M+23 working days with payment 12 calendar days after this
- Credit is required 10 days after an imbalance
  - if the level of debt for a period of 3 days reaches 85% of the credit they have lodged, shippers have to provide more credit to return to their 85% limit
- Post Emergency Claims occurs months after the event and is funded by short shippers

#### Basic overview of balancing system

- At the start of the day Gemini provides a nomination for demand to each shipper based on:
  - DM customer usage estimates
  - An estimate of NDM customer demands in Local Distribution Zones (LDZ)
- Through the day Gemini will update its forecasts based on meter reads and shippers can re-nominate
- Shippers are cashed out based on:
  - the measured volume they have put on
  - minus the actual metered demand of their DM customers
  - minus their share of the actual metered volume of demand at each LDZ meter site (calculated as the residual after shrinkage and DM customer demand is accounted for)

#### **Accounting for DM customer interruptions**

- If a shipper interrupts a DM customer (either to sell that gas onto the market or to address an imbalance), the shipper has to submit a P70 form to account for the volume of gas that the DM customer has turned down.
- If DM customers are asked to turn down or off on behalf of the National Emergency Coordinator (NEC)
  - the emergency curtailment quantity (ECQ) process accounts for the volume interrupted (and provides minimal compensation for lost revenue)
  - for subsequent days, shippers can submit a P70 form instead

### **Accounting for NDM customer interruptions**

- Current system does not account for any non-daily metered (NDM) customer demand reduction except in aggregate
  - Either for stage 2 (firm load shedding) or stage 3 (network isolation)
- We might be able to crudely account for NDM volumes in respect of stage 2 demand reduction but even with this it would be very difficult to pay NDM customers for demand reduction in stage 2 where evidence of load reduction cannot be provided by the individual customer
- We may be able to devise a system for accounting for how much demand has come off in stage 3 (through DNs); however:
  - Might not occur within current cash-out payment timescales
  - This means shippers could go from being 'long' to 'short'; this could have credit impacts

#### **How Neutrality works**

- Short shippers pay into neutrality
- Neutrality pays out:
  - To long shippers
  - For balancing actions including NG trades and ECQ
- Any under or over-recovery is shared among shippers based on throughput on the day
  - This means that if a shipper defaults on payment the costs will be borne by the industry

#### What we want to achieve

- Once firm load shedding occurs, for each day of load shedding:
  - short shippers will face a cash-out price of £20/therm (or higher if it has already exceeded this)
  - firm end users that are interrupted will receive payment at £20/therm (though it may be difficult to pay NDM customers where evidence of demand reduction cannot be provided)
- Once network isolation occurs, for the first day:
  - short shippers will face a cash-out price of £20/therm
  - firm end users (DM and NDM customers) that are interrupted will receive payment at £20/therm

#### **Group 1 issues**

- Gemini and the cash-out process
- The pros and cons of a near time versus post event process
- Credit and other issues

#### **Group 2 issues**

- How to recover funds for interruption payments (neutrality vs 'dedicated fund')
- How to deal with interruptible contracts
- How to pay NDM customers that are affected by load shedding



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