



## ACER Consultation Template

Fields marked with \* are mandatory.

### Introduction

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The Agency for the Cooperation of Energy Regulators ('the Agency') has developed an online template following Article 26(5) of the Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a Network Code on Harmonised Transmission Tariff Structures for Gas ('TAR NC'). The online template has been designed for the NRA/TSO responsible for carrying out the consultation on the reference price methodology to provide a summary of the consultation.

The online template and the tool for the submission of files to the Agency is implemented over a secure IT connection based on https.

Instructions for using the online template and for the submission of the consultation documents are on the appendix, at the end of the online template. For additional information on the online template, visit: [http://www.acer.europa.eu/Official\\_documents/Public\\_consultations/Pages/ACER-Consultation-Template.-Tariff-NC-Article-26\(5\).aspx](http://www.acer.europa.eu/Official_documents/Public_consultations/Pages/ACER-Consultation-Template.-Tariff-NC-Article-26(5).aspx)

### General information on the consultation on the RPM

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\* Member state

United Kingdom

Organisation responsible for the consultation on the RPM.

Northern Ireland Authority for Utility Regulation

Contact point in the NRA/TSO responsible for the consultation.

[REDACTED]

Timeline for the final consultation: launch and closing dates.

21 June 2018; closing 30 August 2018

Will there be any intermediate consultations prior to the final consultation? If so, what topics will they cover? The last section of the survey allows the NRA/TSO providing information on this part of the process.

No, we have carried out a licence modification process already and will carry out a further licence modification process to reflect our decisions on tariff methodology, as appropriate.

Are any intermediate consultations planned/expected prior to the final consultation on the RPM?

- Yes
- To be decided
- No

## **A. Proposed reference price methodology [Article 26 (1)(a)]**

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### **A.1. Information on the parameters used in the proposed RPM related to technical characteristics of the transmission system [Articles 26(1)(a)(i), 30.(1)(a)].**

Provide the information on the parameters listed in Article 30(1)(a)(i-v) when they are an input to the proposed RPM . For parameters that are not an input to the RPM, mark as 'Not applicable'.

The description of the RPM and the justification of the parameters may refer to information requested in other points of Article 26 and in other articles, such as Article 7.

#### **A.1.A. Description of the proposed reference price methodology [Article 26(1)(a)].**

The following description is intended to provide an overview of the RPM. Include a reference to, at least, the following elements. Only refer to these items if they are applicable to the RPM:

- Choice of RPM
- Cost drivers of the RPM
- Locational signals in E/E points resulting of the RPM (e.g.: capacity, distance). Locational signals are price levels that send incentives to network users in order for the network operators to achieve an efficient operation and/or expansion of the gas system.
- Entry/exit split. Cost reflectivity and application to the RPM.
- Capacity/commodity split. Cost reflectivity and application to the RPM.

- Intra-system/cross-system split. Cost reflectivity and application to the RPM.
- Adjustments (benchmarking, equalisation and rescaling).
- Use of inter-TSO compensation mechanism. Brief note on the application of the RPM in multi-TSO E/E system and reference to the inter-TSO compensation mechanism consultation.

Indicate the choice of RPM (e.g.: postage stamp, capacity weighted distance, virtual point, matrix, or other)

postage stamp

Provide description.

We propose to continue to use the "postalisation" regime that has been in place since 2004. The annual recovery costs of the different pipelines are added to establish the transmission services revenue. The volumes through all entry and exit points are treated equally, so that end users pay the same regardless of the distance that the gas travels. Charges are calculated annually following a process to collect capacity and commodity forecasts. Non-annual entry capacity products are available which use seasonal multiplier factors. There is no ex-ante entry-exit split. The capacity commodity split is currently 75:25 and is being consulted on to be changed to 95:5. There are no cross system volumes, no storage and no interruption being forecast.

Reference to consultation document(s). Provide document ID and relevant page(s).

Section 4 of consultation document, page 22.

### A.1.B. Justification of the parameters and how they are used in the RPM [Articles 26(1)(a)(i), 30(1)(a)(i-v)].

Justify the selection and use of the parameters listed in Article 30(1)(a)(i-v) that are and input to the RPM, in view of the level of complexity of the transmission network related to the technical characteristics of the transmission system.

Reference to consultation document(s). Provide document ID and relevant page(s).

the parameters are discussed in section 4 of the consultation document, page 23.

### A.1.C. Technical capacity at entry and exit points: values and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(i)].

Is the parameter an input to the RPM?



- Yes  
 No

#### A.1.D. Forecasted contracted capacity at entry and exit points: values and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(ii)].

Is the parameter an input to the RPM?

- Yes  
 No

Values of the forecasted contracted capacity at entry and exit points. Reference to consultation document(s). Provide document ID and relevant page(s).

These values are established as part of the annual tariff setting process. The consultation document has links to published documents which show these forecasts, please see Table 6 on page 48 of consultation document

Associated assumptions for the values of the forecasted contracted capacity at entry and exit points. Reference to consultation document(s). Provide document ID and relevant page(s).

These are published as part of the tariff setting process, and the consultation has links to the published documents, please see section 8, page 46, for hyperlinks to documents and Table 6 on page 48 for summary of where transparency information can be found.

#### A.1.E. The quantity and the direction of the gas flow for entry and exit points: values and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(iii)].

Is the parameter an input to the RPM?

- Yes  
 No

#### A.1.F. Structural representation of the transmission network with an appropriate level of detail and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(iv)].

The representation should include an image of a simplified network depicting the transmission network and distinguishing the elements defined in Article 2(1)(1) of the Regulation (EC) No. 715 /2009:

- High-pressure pipelines (other than the upstream pipeline network and other than high-pressure pipelines primarily used in the context of local distribution of natural gas, with a view to its delivery).
- Transmission networks which are dedicated to supplying domestic customers.

- TSO-DSO interface (transmission exit points to DSO).

The representation should include the transmission network elements included in the regulatory asset base.

Reference to consultation document(s). Provide document ID and relevant page(s).

The Network is illustrated in a picture in Appendix 2 of the consultation document.

Associated assumptions and criteria used for the structural representations (e.g.: clustering, average distances, etc).

Provide reference to consultation document(s):

The assumptions are outlined in the published Gas Capacity Statement, a link to which is in page 47 of the consultation document.

### A.1.G. Additional technical information and associated assumptions about the transmission network such as the length of pipelines, the diameter of pipelines and the power of compressor stations [Articles 26(1)(a)(i), 30(1)(a)(v)].

Are there other parameter used as input to the RPM related to technical characteristics of the transmission system? Provide pipeline pressure levels if available.

- Yes  
 No

## A.2. The value of the proposed adjustments for capacity-based transmission tariffs pursuant to Article 9 [Article 26(1)(a)(ii)]

### A.2.A. Proposed discount(s) at entry points from and exit points to storage facilities [Articles 26(1)(a)(ii), 9(1)].

Do you apply the discount(s) at entry points from and/or exit points to storage facilities?

- Yes  
 No

Are there storage facilities connected to more than one transmission or distribution network system.

- Yes  
 No

### A.2.B. Proposed discount(s) at entry points from LNG facilities [Articles 26(1)(a)(ii), 9(2)].

Do you apply the discount(s) at entry points from LNG facilities?

- Yes
- No

### A.2.C. Proposed discount(s) at entry points from and exit points to infrastructure developed with the purpose of ending the isolation of Member States [Articles 26(1)(a)(ii), 9(2)].

Do you apply discount(s) at entry points from and exit points to infrastructure developed with the purpose of ending the isolation of Member States?

- Yes
- No

## A.3. Indicative reference prices subject to consultation [Article 26(1)(a)(iii)]

### A.3.A. Indicative reference prices at each entry and at each exit point [Article 26(1)(a)(iii)].

Reference to consultation document(s). Provide document ID and relevant page(s).

The consultation document has a link to the published tariff which provides the reference prices, paragraph 8.3, page 46.

## A.4. Cost allocation assessment [Articles 26(1)(a)(iv), 5]

According to Article 27(2)(b) the Agency shall assess the compliance of Article 7. Given that Article 7 (c) refers to the cost allocation assessment, the Agency's analysis of compliance applies to the cost allocation assessment. For this purpose, the Agency request the NRA/TSO responsible for the consultation to submit a justification of the cost allocation assessment together with the rest of the consultation documentation once the consultation is launched. This only applies for the case when the cost allocation ratio exceeds 10%. This justification is requested by the Agency independently of its inclusion in the NRA motivated decision described in Article 27(4). For the submission of documents relevant to this section, see the upload section at the end of this template.

### A.4.A. Results of the capacity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Capacity cost allocation comparison index (%)

200

### A.4.B. Components of the capacity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Reference to consultation document(s). Provide document ID and relevant page(s).

The assessment is included as Appendix 3 to the consultation.

#### A.4.C. Details of components of the capacity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Description of the calculation, including:

- Details of the cost drivers following Article 5(1)(a).
- Rationale for the combination of capacity cost drivers.
- Where the result of the capacity cost comparison index exceeds 10%, provide the justification for such results.

Reference to consultation document(s). Provide document ID and relevant page(s).

The calculation is outlined in Appendix 3 of the consultation and discussed from paragraph 4.18 on page 26. The formula provided does not provide for zero cross system flows. This means that the the numerator is too high as there is no cross system ratio to be subtracted, and the denominator is too small as there is only one ratio instead of two. Therefore, a higher number is divided by a lower number, leading to high result. As we have no cross-system volumes, there can be no cross-subsidy.

#### A.4.A. Results of the commodity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Commodity cost allocation comparison index (%).

200

#### A.4.B. Components of the commodity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Reference to consultation document(s). Provide document ID and relevant page(s).

the main component will be the compressor fuel costs, along with some operational costs which vary with throughput. This is discussed in section 5 of the consultation document. The formula is worked out in Appendix 3 and explained from paragraph 4.18 on page 26.

#### A.4.C. Details of components of the commodity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Description of the calculation, including:

- Details of the cost drivers following Article 5(1)(a).
- Rationale for the combination of commodity cost drivers.
- Where the result of the commodity cost comparison index exceeds 10%, provide the justification for such results.

Reference to consultation document(s). Provide document ID and relevant page(s).

The explanation for the high formula result is exactly the same as the capacity formula. The formula does not allow for zero cross-system flow, and therefore results in an unusual result. As there is no cross-system flow, there can be no cross-subsidy.

## **A.5. Assessment of the proposed reference price methodology in accordance to Article 7 and Article 13 of the Regulation (EC) No. 715/2009 [Article 26(1)(a)(v)]**

The Agency will evaluate the compliance of the RPM against the set of principles laid out in Article 7 [Article 27(2)(b)(1)]. For the purpose of making explicit the criteria that will be used for this analysis, the template provides the following non-exhaustive list of suggestions to follow in the assessment. Quantitative analysis and stakeholder support will be taken by the Agency as evidence. When such proofs are not available, compliance will be reviewed based on the explanations provided.

### **A.5.A. The RPM should: enable network users to reproduce the calculation of reference prices and their accurate forecast.**

The description of the RPM, together with the rest of elements listed in this template should be instrumental to allow replicating the calculation of reference prices. Provide the manner and the order in which these elements are used for the calculation of the RPM.

Reference to consultation document(s). Provide document ID and relevant page(s).

The postalised tariff has been in place since 2004, so the network users are familiar with its operation. The GMO NI, which is the system operator for gas transmission, hosts a number of meetings which keep network users updated on matters relating to the application of the RPM. The Utility Regulator (NIAUR) and the GMO NI prepare a number of documents which the GMO NI publishes on its website. These are discussed in section 8 of the consultation document, from page 46.

**A.5.B. The RPM shall into account the actual costs incurred for the provision of transmission services considering the level of complexity of the transmission network.**

Evaluate the cost reflectivity of the RPM related to the level of complexity and the technical characteristics of the transmission network. The assessment can be based on elements such as:

- How do the level of complexity and the technical characteristics of the transmission network influence the choice of RPM?
- Is the use or non-use of locational signals related to the level of complexity and the technical characteristics of the transmission network?
- How does the choice of E/E split affect the cost reflectivity of reference prices?
- How do reference prices at E/E points relate to the underlying costs of the network?
- Indicate any other elements of the RPM relevant to assess the cost reflectivity of the RPM

Reference to consultation document(s). Provide document ID and relevant page(s).

The operators of the transmission pipelines included in the network are all subject to regulatory control through their licences. They must prepare annual Gas Capacity Statement which outlines the technical characteristics of the transmission network. The regulatory control ensures that the agreed costs included in the RPM are scrutinised by the Utility Regulator. The NI network does not have an ex-ante entry exit split, and the postalised tariff results in equal prices across the network, regardless of entry and exit point.

**A.5.C. The RPM shall ensure non-discrimination and shall prevent undue cross-subsidisation including by taking into account the cost allocation assessments set out in Article 5.**

Evidence for the assessment should take into account the cost allocation assessment, which checks the non-discrimination between two predefined groups of network users. Other means can be used to check non-discrimination between other groups of network users. Provide reference to consultation document(s). Provide document ID and relevant page(s).

As there is no cross-system use and no storage, there is no cross-subsidy.

**A.5.D. The RPM shall ensure that significant volume risk related particularly to transports across an entry-exit system is not assigned to final customers within that entry-exit system.**

Explain how the variation in transit flows affects reference prices for final consumers. The assessment can be based on elements such as:

- The contribution of the E/E split to the risk bared by final consumers.
- Are there any ex-ante splits of revenues for the purpose of intra-system and cross-system users?

Reference to consultation document(s). Provide document ID and relevant page(s).

There are no cross-system volumes, see from paragraph 4.18, page 26.

#### **A.5.E. The RPM shall ensure that the resulting reference prices do not distort cross-border trade.**

Refer at least to the effect of the E/E split on cross-border trade. Provide reference to consultation document (s). Provide document ID and relevant page(s).

The assessment of the proposed RPM is set out from paragraph 4.26, page 28.

### **A.6. Comparison with the CWD methodology [Article 8] accompanied by the indicative reference prices subject to consultation set out in Article 26 (1)(a)(iii)**

**A.6.A. Where the proposed reference price methodology is other than the capacity weighted distance reference price methodology detailed in Article 8, a comparison between both methodologies should be performed [Articles 26(1)(a)(vi), 8].**

The comparison should be performed with an appropriate level of detail and should enable stakeholders to identify the main differences, advantages and disadvantages of the compared methodologies. The following non-exhaustive list provides relevant elements that can guide the comparison:

- Differences, if any, in the input parameters for each of the methodologies such as input parameters (e.g.: technical and forecasted capacity), ratios for the allowed or target revenue listed in Article 30(1)(b)(v) and discounts to storage and LNG.
- Differences in the manner in which each of the methodologies reflect the level of complexity and the technical characteristics of the transmission network.
- Relation of each of the methodologies to the principles laid out in Article 7.

- Cost allocation assessment in Article 5.

Provide the same parameters and assumptions used for the CWD as for the proposed RPM, highlighting the differences, if any. When the parameters used for each of the methodologies are different, indicate and follow through the differences in reference prices.

Reference to consultation document(s). Provide document ID and relevant page(s).

The counterfactual is included in Annex 2 of the consultation document

#### A.6.B. Comparison of indicative reference prices at each entry point and at each exit point of the proposed RPM and the CWD detailed in Article 8.

Reference to consultation document(s). Provide document ID and relevant page(s).

the counterfactual is included in Annex 2 of the consultation document

## **B. Allowed or Target Revenue of the TSO [Article 26(1)(b)]**

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### **B.7. Indicative information set out in Article 30(1)(b)(i), (iv) and (v)**

B.7.A. Allowed or target revenue, or both, of the transmission system operator [Articles 26 (1)(b), 30(1)(b)(i)].

- If allowed and target revenue are both used, provide detail for each case.
- In the case of multiple TSOs, indicate the approach adopted. In the case where the NRA is carrying out the consultation, provide the reference where the information on allowed or target revenue for each TSO can be found.
- Units: currency/year

Description.

Allowed revenue is used, which is derived from price controls, to determine FRR (Forecast Required Revenue). The FRRs of the TSOs is summed to find the Transmission Services Revenue. The ARRs (Actual Required Revenue) is then used in the year end reconciliation.

Reference to consultation document(s). Provide document ID and relevant page(s).

The FRRs of the TSOs is shown in the published price control documents, a link to which is included in paragraph 8.4 on page 47 of the consultation document.

The allowed revenue, which is included in the tariff calculation, is published by the GMO NI. The link to the postalised tariff and Explanatory Document is included in paragraph 8.3 on page 46 of the consultation document.

### B.7.B. Transmission services revenue [Articles 26(1)(b), 30(1)(b)(iv)].

Description (Units: currency/year)

Transmssion services revenue is the sum of the FRRs of the TSOs which form the NI transmission network. it is stated in sterling with the year starting in 1st October.

Reference to consultation document(s). Provide document ID and relevant page(s).

This is discussed in section 5 of the consultation document, from page 30, with link to documents that include the information.

### B.7.C. Capacity-commodity split of the transmission services revenue.

Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariff [Articles 26(1)(b), 30(1)(b)(v)(1)].

Revenue from recovered from capacity-based transmission tariffs, %:

95

Revenue from recovered from commodity-based transmission tariffs, %:

5

Reference to consultation document(s). Provide document ID and relevant page(s).

This will be a change to the NI Network so is being consulted on. it will require modifications to the TSOs' licences. Our proposal is outlined from paragraph 5.15 on page 33 with the implementation process outlined in sections 9 and 10 on pages 54 and 55.

### B.7.D. Entry-exit split of the transmission services revenue.

Breakdown between the revenue from capacity-based transmission tariffs at all entry points and the revenue from capacity-based transmission tariffs at all exit points [Articles 26(1)(b), 30(1)(b)(v)(2)].

Revenue from capacity-based transmission tariffs at all entry points, %:

Revenue from capacity-based transmission tariffs at all exit points, %:

Reference to consultation document(s). Provide document ID and relevant page(s).

The fields above do not allow a "not applicable" entry. However, it is our view that an ex-ante entry exit split is not in keeping with the current postalised system, so the split will continue to be an output from the reconciliation process. For this reason, we have input a 50:50 split into the fields above. This is discussed in paragraph 5.6, page 31 of the consultation document.

### B.7.E. Intra-system/cross-border split of the transmission services revenue.

Breakdown between the revenue from domestic network users at both entry points and exit points and the revenue from cross-border network users at both entry points and exit points calculated as set out in Article 5, [Articles 26(1)(b), 30(1)(b)(v)(3)]

Revenue from domestic network users at entry points and exit points, %:

Revenue from cross-border network users at entry points and exit points, %:

Reference to consultation document(s). Provide document ID and relevant page(s).

This is discussed in section 4 of the consultation document, in the section on cost allocation assessment. There are no cross-system volumes in the NI transmission network.

## C. Information on commodity based and non-transmission tariffs [Article 26(1)(c)]

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Following Article 27(2), the Agency shall analyse the compliance of the criteria used for setting commodity-based tariffs as set out in Article 4(3), and of the criteria used for setting non-transmission tariffs as set out in Article 4(4). The analysis of compliance will be based on the terms listed in this section.

### C.8. Flow based charge. Information on commodity-based transmission tariffs referred to in Article 4(3) [Article 26(1)(c)(i)]

Do you apply a flow based charge?

- Yes
- No

### C.8.A. The manner in which they are set [Articles 26(1)(c)(i)(1), 4(3)(a)].

Provide the following information:

- Description, rationale and extent to which the flow based charge is used.
- Formula with cost drivers for monetary terms / in kind.
- Reference used for the calculation (historical flows, forecasted flows or both).
- Confirm that the flow based charge is set in such a way that it is the same at all entry points and the same at all exit points.

Description:

The flow based charge is set as a percentage of the transmission services revenue, which uses forecast required revenue and forecast capacity and commodity. As previously explained, the postalised tariff is then subject to a year end reconciliation for actual required revenue, actual capacity and actual volumes. The flow based charge does not use specific cost drivers. This is because we have identified that the flow based costs are around 3 - 5% of transmission services revenue but may vary slightly between forecast and actual. We therefore prefer to have a set percentage, which is not altered with fluctuating flow based costs.

We are consulting on reducing the commodity element of our transmission charge from 25% to 5% as we consider that the flow based costs do not exceed 5% of the transmission services revenue. The postalised tariff is calculated so that the commodity charge is only levied on exit, with zero commodity charge at entry.

Reference to consultation document(s). Provide document ID and relevant page(s).

This is discussed in section 5 of the consultation document, paragraph 5.13 on page 34.

### C.8.B. The share of the allowed or target revenue forecasted to be recovered from such tariffs [Articles 26(1)(c)(i)(2), 4(3)(a)].

Share of transmission service revenue (allowed or target revenue) to be recovered by flow based charges (%)

Reference to consultation document(s). Provide document ID and relevant page(s).

This is discussed in section 5 of the consultation document, from paragraph 5.9 on page 33.

### C.8.C. The indicative flow-based charge [Articles 26(1)(c)(i)(3), 4(3)(a)].

Description:

After consultation and licence modification, the flow-based charge (commodity) will reduce while the capacity charge will increase. We have provided explanation on the impact of the change in capacity commodity split. In addition to providing links to where the current charges are published, we have inserted a table to show the indicative charges using the proposed capacity commodity split of 95:5 compared to the published forecast tariff for 18/19.

Reference to consultation document(s). Provide document ID and relevant page(s).

Section 6 of the consultation document, Table 3, page 40.

### C.9. Complementary revenue recovery charge: Information on commodity-based transmission tariffs referred to in Article 4(3) [Article 26(1)(c)(i)]

Do you use a complementary revenue recovery charge?

- Yes  
 No

Comments, if relevant.

The postalised tariff regime allows for a year end reconciliation, which is collected through a single bullet payment.

### C.10. Information on non-transmission services provided to network users [Article 26(1)(c)(ii)]

Are there non-transmission services provided to network users on the bases of a non-transmission service tariff methodology?

- Yes  
 No

Comments, if relevant.

The postalised regime allows for all transmission costs to be collected through the postalised tariff. We do not currently deem there to be any non-transmission services. All services are deemed to be transmission services.

## D. Compared tariffs and tariff model [Article 26(1)(d)]

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### D.11. The indicative information set out in Article 30(2)

The comparison should be based on indicative reference prices. Whenever the data necessary for this comparison is not available at the time of the consultation on the RPM (e.g.: multipliers and seasonality), provide the date and the source where the information will be available.

#### D.11.A. Comparison between transmission tariffs applicable for:

- the prevailing tariff period, and for
- the tariff period for which the information is published.

Explain the difference between the level of transmission tariffs [Articles 26(1)(d), 30(2)(a)(i)].

Comparison with the past tariff period. The comparison should be based on transmission tariffs.

Reference to consultation document(s). Provide document ID and relevant page(s).

The comparison between this year's tariff and last year's is provided in the Reconciliation Explanatory Note, prepared by the Utility Regulatory, as well as in the Explanatory Note which is prepared as the new tariff is published. The links to these documents are provided in paragraph 8.3, page 49.

Link to information on TSO/NRA website.

<http://gmo-ni.com/assets/documents/Reconciliation-Explanatory.pdf#asset:136:url>

#### D.11.B. Comparison between transmission tariffs applicable for:

- the tariff period for which the information is published, and for
- each tariff period within the remainder of the regulatory period.

Provide estimated difference in the level of transmission tariffs [Articles 26(1)(d), 30(2)(a)(ii)].

Comparison with upcoming tariff periods. The comparison should be based on transmission tariffs.

Reference to consultation document(s). Provide document ID and relevant page(s).

The annual tariff publication includes this information. There is a link to it at paragraph 8.3, page 49, of the consultation document.

Link to information on TSO/NRA website.

<http://gmo-ni.com/tariffs/explanatory-notes>

**D.11.C. At least a simplified tariff model, updated regularly, enabling network users to calculate the transmission tariffs applicable for the prevailing tariff period and to estimate their possible evolution beyond such tariff period [Articles 26(1)(d), 30(2)(b)].**

Tariff model for prevailing tariffs and future tariff periods. The simplified tariff model should serve for the calculation of tariffs. If the information on multipliers and seasonality is not available at the time of the publication of the consultation on the RPM, it should be indicated. By the time this information is published, the simplified tariff model should be updated to include information on tariffs.

Reference to consultation document(s). Provide document ID and relevant page(s).

This is mentioned in section 8 of the consultation document. The simplified tariff spreadsheet is due to be published on the GMO NI website before the end of June.

Link to information on TSO/NRA website.

<http://gmo-ni.com/tariffs>

**D.11.D. Explanation of how to use the simplified tariff model [Articles 26(1)(d) and 30(2)(b)].**

Reference to consultation document(s). Provide document ID and relevant page(s).

The Explanatory Note and the Charging Methodology documents both explain how the tariff is calculated. The links to these documents is provided in section 8 of the consultation document. The simplified tariff spreadsheet is due to be published on the GMO NI website before the end of June.

## **E. Fixed payable price under price cap regime [Article 26(1)(e)]**

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### **E.12. Where the fixed payable price referred to in Article 24(b) is offered under a price cap regime for existing capacity**

Is the fixed payable price referred to in Article 24(b) offered under a price cap regime for existing capacity.

- Yes  
 No

## **Documentation submission to the Agency**

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The online template and the tool for the submission of files to the Agency is implemented over a secure IT connection based on https.

## Final consultation on th RPM

The Agency requests the NRA/TSO responsible for launching the final consultation on the RPM to follow the below requirements when submitting the consultation documentation to the Agency:

- **All files containing numerical data** must be provided to the Agency in non-protected Excel or Excel compatible files independently of how they are published in the consultation.
- **Files containing text** must be provided to the Agency in Word, Word compatible files, or PDF.
- **Files containing images** must be provided to the Agency in a commonly used image formats or PDF.
- **All data must be provided in non-protected files** that allow editing. If PDFs are used, they must not be protected against editing (e.g.: they must allow copying the text of the PDF)
- **Confidential information must be clearly marked as confidential. In the cases where the consultation includes confidential information, a non-confidential version of the consultation must also be provided as part of the documentation.** Such version can be prepared erasing or aggregating the sensible information to render the data non-confidential.

Upload consultation documentation

Provide a description of the uploaded documents and how they relate to the consultation (e.g.: main documents, supporting files, etc)

To be added

Information on confidentiality. If any of the submitted files are subject to confidentiality rules, please identify these files and provide additional non confidential versions.

None

## Cost allocation assessment justification

Does the capacity and/or the commodity cost allocation comparison index, as per Articles(3)(c) and Article(4)(c), exceed 10%?

Yes

No

In the cases where the cost allocation assessment exceeds 10%, ACER request a justification to be submitted as part of the consultation. Such information can be provided to ACER at the time of launching the final consultation allowing ACER with sufficient time to review it. See section on the cost allocation assessment for more details.

Upload supporting files with the justification for the cost allocation assessment.

Comments, if relevant.

Please see earlier comments. We have no cross-system volumes, so therefore no cross subsidy is possible. the formula does not allow for zero cross-system volumes which leads to an unusual result. This is explained from paragraph 4.18, page 26 of the consultation document.

## Additional supporting documents

For the purpose of making the implementation of the TAR NC more efficient, the Agency provides below two sections to facilitate information on intermediate consultations and on the publication of stakeholder responses relative to the final consultation on the RPM. The Agency advocates that NRAs /TSOs provide links to this data and/or the documentation itself by the time it is available. The survey can be accessed after the submission of the final consultation for the purpose of providing this data.

## Final consultation on th RPM: responses and summary

Upload consultation documentation

Link to the consultation documents.

## Intermediate consultation(s) on th RPM

Upload intermediate consultation documentation.

Link to the consultation documents.

## Appendix: Instructions for using the survey

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**The online template and the tool for the submission of files to the Agency is implemented over a secure IT connection which will be operational as of end of September 2017.**

### Reading the survey

The online template lists all legal requirements for the consultation on the RPM according to Article 26. In addition, it provides interpretation and guidelines to several requirements of Article 26. These two levels of text can be distinguished based on the colour of the typography used:

- **Blue typography** replicates the text of the Tariff NC and provides references to articles of the Tariff NC.
- **Black typography** provides descriptions and clarifications to the text of the TAR NC.

The additional clarifications and guidelines provide the reasoning and arguments that ACER will employ when reviewing the consultations, following the requirement set in Article 27(2).

The online template is structured into five different sections following the structure of Article 26. At the end of the survey, a section for uploading the consultation document(s) is provided.

The online template mirrors all requirements laid out in the template checklist which is available at:

### Timeline for completing the survey

The online template can be filled as of its date of publication (5 July 2017). It can be saved as a draft and can be subsequently updated following the steps of the national process until the final submission. The Agency advocates that the NRA/TSO responsible for the consultation provides the requested information relative to the consultation on the RPM using the online template. This includes:

- **Prior to the consultation**, the NRA/TSO should provide details relative to the contact point, the estimated timeline for the consultation, and the planning of intermediate consultations, if any.
- **After the publication of the final consultation**, the NRA/TSO should submit details relative to the publication of the stakeholder responses [Article 26(3)] and the NRA motivated decision [Article 27(4)].

### NRA/TSO input on the survey

When filling out the survey, the NRA/TSO responsible for the consultation on the RPM, should provide the following information:

- **Descriptions and justifications** based the requirements listed on Article 26.
- **References to the consultation document(s)** where the requested information can be found. References should include the name of the document and the page(s) being referred.
- **Relevant information on the consultation process.**

Whenever the format of the survey incurs in any incompatibility with the structure of the consultation, the NRS/TSO should contact ACER.

### Submission of the consultation document(s) to the Agency

This platform allows NRAs/TSOs submitting the consultation document(s) to the Agency. The submission of these documents is an obligation laid out under Article 27(1) and it is independent of the use that NRAs/TSOs make of the template. For this purpose, the NRA/TSO carrying out the consultation can use this file submission tool above.

### Publication of the survey summary

Upon filling in the requested information laid out in the online template tool, the NRA/TSO can access a summary of the consultation on PDF format. The PDF document can be included as an annex to the national consultation.

Regardless of the NRA/TSO decision to publish this document, the Agency will release on its website the completed templates as part of its analyses on the RPM consultations [Article 27(2)].

### Useful links

[COMMISSION REGULATION \(EU\) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas \(NC TAR\) \(http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0460&from=EN\)](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0460&from=EN)

[ACER Tariff Template website \(http://www.acer.europa.eu/en/Gas/Framework%20guidelines\\_and\\_network%20codes/TAR\\_IMP/Pages/default.aspx\)](http://www.acer.europa.eu/en/Gas/Framework%20guidelines_and_network%20codes/TAR_IMP/Pages/default.aspx)

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### Contact

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