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National Grid Alternate Gas Day Proposal



Submitted to North American Energy Standards Board April 18, 2014



National Grid's Response to RM14-2

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- **Earlier start to Gas Day can offer greater alignment**
 - *2 am CCT for start of gas day will move both gas and electric away from peak periods in constrained regions (Northeast)*
- **Need for sufficient time between issuance of scheduled quantity results and subsequent nomination deadline**
 - *4 hours for processing Timely nominations and results*
 - *~3 hours for processing Evening and Intraday nominations and results*
- **Adjustments to Gas Day must address concerns of all stakeholders and minimize disruption to current practices to the extent practicable**
- **Additional potential for revisions to capacity release timelines based on 1 pm Timely to allow shippers to post, and pipeline to award, capacity in the day-ahead market during Timely Cycle**

Alternative to NOPR Proposal

		Current	NGC	RM14-2	National Grid
<i>Start of the Gas Day:</i>		9AM	9AM	4AM	2AM
Timely Cycle	Noms Due	11:30 AM	1:00 PM	1:00 PM	1:00 PM
	Confirm Due	3:30 PM	4:30 PM	-	4:30 PM
	SQR Issued	4:30 PM	5:00 PM	4:30 PM	5:00 PM
	Flow Time	9:00 AM	9:00 AM	4:00 AM	2:00 AM
Evening Cycle					
Evening Cycle	Noms Due	6:00 PM	6:30 PM	6:00 PM	6:30 PM
	Confirm Due	9:00 PM	9:30 PM	-	9:30 PM
	SQR Issued	10:00 PM	10:00 PM	10:00 PM	10:00 PM
	Flow Time	9:00 AM	9:00 AM	4:00 AM	2:00 AM
ID 1 Cycle					
ID 1 Cycle	Noms Due	10:00 AM	9:00 AM	8:00 AM	7:00 AM
	Confirm Due	1:00 PM	11:30 AM	-	9:00 AM
	SQR Issued	2:00 PM	12:00 PM	11:00 AM	9:30 AM
	Flow Time	5:00 PM	3:00 PM	12:00 PM	10:00 AM
	Flow Hours	16 Hours	18 Hours	16 Hours	16 Hours
ID 2 Cycle					
ID 2 Cycle	Noms Due	5:00 PM (no-bump)	2:00 PM	10:30 AM	11:00 AM
	Confirm Due	8:00 PM	4:00 PM	-	1:30 PM
	SQR Issued	9:00 PM	4:30 PM	2:00 PM	2:00 PM
	Flow Time	9:00 PM	9:00 PM	4:00 PM	2:00 PM
	Flow Hours	12 Hours	12 Hours	12 Hours	12 Hours
ID 3 Cycle					
ID 3 Cycle	Noms Due		9:00 PM (no-bump)	4:00 PM	5:00 PM (no-bump)
	Confirm Due		11:00 PM	-	7:30 PM
	SQR Issued		11:30 PM	6:00 PM	8:00 PM
	Flow Time		12:00 AM	7:00 PM	8:00 PM
	Flow Hours		9 Hours	9 Hours	6 Hours
ID 4 Cycle					
ID 4 Cycle	Noms Due			7:00 PM (no-bump)	9:00 PM (no-bump)
	Confirm Due			8:30 PM	11:00 PM
	SQR Issued			9:00 PM	11:30 PM
	Flow Time			9:00 PM	12:00 AM
	Flow Hours			7 Hours	2 Hours

- All times are CCT
- Unless otherwise indicated, bumping is allowed during the cycle
- Pipelines will continue to offer additional hourly cycles as needed in order to allow true-up nominations beyond standard cycles

Revisions to Capacity Release Timeline

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- Current capacity release timeline (*posting/bidding/awarding*) does not allow a shipper to post capacity in the day-ahead market for award and nomination at Timely
- Based upon the new 1pm Timely nominations due deadline supported by FERC, all Pipelines should allow Shippers to post capacity for bid by 10 am for award by 12 pm
 - *Firm shippers better able to determine excess capacity for release into marketplace*
 - *Replacement shippers able to acquire capacity at Timely; increased access to firm nominations and long-haul capacity in constrained markets during first priority cycle*

Benefits of National Grid's Proposal

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- Greater alignment between gas and electric days
- Minimizes disruption to current practices and timelines
- Avoids scheduling overlap between cycles to best optimize assets
- Maintains sufficient time between cycles for response to curtailments and changes
- Proposal based on hours of market liquidity
 - *Provides Generators, LDCs, Producers, Pipelines and all other shippers greatest assurance of intraday flows*
 - *Ability to react to intraday adjustments*
- Shippers gain additional hour to submit a bumpable nomination and access to available assets closer to end of Gas Day
- Revisions to current capacity release timeline allows shippers to better determine excess capacity and release into marketplace for Timely nomination