

CONSULTATION DOCUMENT

GB ECM-26

Review of Interconnector Charging Arrangements.

July 2010

Email Responses are preferred and should be sent to lain.Pielage@uk.ngrid.com
All responses should arrive no later than 26th August 2010

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1 Executive summary

This consultation document provides the background and a review of the charging arrangements as they apply to Interconnectors. It lays out the principal UK legislation and regulatory framework that National Grid conforms to, and how this relates to the relevant EU legislation.

This review is being made in the context of the introduction of a mandatory Inter TSO compensation (ITC) mechanism. We expect that the mandatory ITC mechanism will come into force this summer under existing "Second Package" of EU legislation.

NGET also believes, with the introduction of the "Third Package" of EU legislation, and the further promotion of the single Internal Market in Electricity that it brings, that now is an appropriate time to review the changing arrangements ahead of Winter 2010/11 and the full introduction of the Third Package in March 2011.

This consultation sets out the rationale for treating Interconnectors differently from other users connected to the GB transmission system and proposes that TNUoS charges for Interconnector Owners should be removed. This is in line with the treatment of Interconnectors in the rest of Europe and in line with the general assumptions under the EU legislation. This change will be incorporated in the current charging year and so would be effective for Winter 2010/11.

Under the requirements of Standard Licence condition C5 of the Transmission Licence, National Grid is seeking views on these charging proposals. National Grid believes that the proposed change better meets the objective set out in the licence through taking account of developments in the transmission licensees business.

This consultation document can be found on the National Grid website at the following link:

<http://www.nationalgrid.com/uk/Electricity/Charges/modifications/uscmc/>

2 Introduction

National Grid is obliged under the Transmission Licence:

- (i) to make revisions to the Charging Statements in order that the information set out in the statements shall continue to be accurate in all material respects;
- (ii) to keep the Use of System charging methodology at all times under review;
- (iii) to make such modifications of the Use of System charging methodology as may be requisite for the purpose of better achieving the relevant objectives, which are:
 - (a) to facilitate effective competition in the generation and supply of electricity and (so far as is consistent therewith) to facilitate competition in the sale, distribution and purchase of electricity;
 - (b) to result in charges which reflect, as far as reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and in accordance with the STC) incurred by transmission licensees in their transmission businesses; and

(c) that, so far as is consistent with sub-paragraphs (a) and (b), the Use of System charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees' transmission businesses.

Before making a modification to the Use of System Charging Methodology, National Grid is also required to consult with CUSC Users on the proposed modification for a period of no less than 28 days within which they may make written representations.

This consultation document sets out the issues and rationale for modifying the Statement of the Use of System Charging Methodology to ensure compliance with both the UK and EU legislation.

3 UK Regulatory Framework

NGET's obligations are outlined within the Transmission Licence; the principal obligations in respect of TNUoS charging are within Condition C5. This essentially sets out the arrangements under which National Grid must determine and maintain a Use of System methodology that is approved by the Authority.

When modifying that charging methodology, NGET has to demonstrate to the satisfaction of the Authority that the proposed change better meets the "Relevant Objectives" set out in condition (SLC) at paragraphs C5 5(a), C5 5(b) and C5 5(c) namely:

- facilitating competition;
- reflecting costs incurred; and
- taking into account of developments in the transmission businesses.

Additionally, Condition C7 (1) of NGET's licence prohibits discrimination "between any persons or class or classes of persons".

Within this framework, Interconnectors, in common with generators, are charged on their Transmission Entry Capacity (TEC) for importing power to the GB. Interconnectors, as would all other users, also incur demand charges for the off-take of power over the peak demand periods.

Where a particular User is materially and demonstrably different is it acceptable to treat them differently within the charging methodology. For example, demand and generation users are treated differently with respect to the share of the overall revenue recovery.

4 EU Regulation

This section sets out principal EU legislation with regards to interconnectors. The current requirements are mainly set out in:

- Regulation EC No 1228/2003¹ on condition for the access to the network for cross border exchanges in electricity; and

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:176:0001:0010:EN:PDF>

- Regulation EU No 714/2009² on conditions for access to the network for cross border exchanges (repealing 1228/2003), that entered into force in July 2010 and applies from 3rd March 2011

For the avoidance of doubt, a reference to “the Regulation” means Regulation EU No 714/2009 however equivalent clauses are also within the current 1228/2003 regulation.

The aim of the Regulation is to set out fair rules for cross-border exchanges in electricity, thus enhancing competition across all Member States. In so doing, it provides for the creation of a mandatory inter-TSO compensation (ITC) mechanism to be made binding on all TSO through the “comitology” procedure. The ITC mechanism that we expect to become mandatory effect this by providing compensation for “cross border flows” funded by the Transmission System Operators (TSO) on whose systems those flows originate or terminate.

Whilst there have been many debates over the exact detail of the ITC mechanism as it has made its way through the legislative process, in the context of the legislation, it is intended to cover compensation for all cross border flows so that those flows are not exposed to multiple charges for network access as they enter or exit Member State boundaries. In effect, purchasing access in one Member State provides access to all Member States.

The ITC mechanism has not yet been made mandatory under the EU comitology process. Nevertheless, the main principles have been used to develop the existing voluntary mechanism for 2010 and this consultation assumes that a mandatory mechanism, very similar if not identical to this voluntary mechanism, will become binding this summer.

Directive 2003/54/EC³ concerning common rules for the internal market in electricity is also referred to below as it provides additional definition of terms used within the Regulations.

4.1 Principal objectives of the EU legislation

There are a number of clauses within the Regulation that are particularly important in the context of charging for network access, these are discussed below with their relevance to the UK framework.

Article 13.1. ‘Transmission system operators shall receive compensation for costs incurred as a result of hosting cross-border flows of electricity on their networks’; and

Article 13.2. ‘The compensation ...shall be paid by the operators of the national transmission systems from which cross-border flows originate and the systems where they terminate’.

These are the high level principles to be adopted by the mandatory ITC mechanism: TSOs that host flows are compensated and the compensation is funded by the TSOs who cause the flows. Imports to, and exports from the GB system are considered to cause flows on other systems. As GB is an overall importer, the net result is that GB is a contributor to the ITC mechanism. The ITC payment by GB is essentially the net

² <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0015:0035:EN:PDF>

³ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:176:0037:0055:EN:PDF>

of the costs that GB imposes on other transmission systems and the cost imposed on GB for hosting transits.

Therefore in the context of the third package and under a mandatory ITC mechanism, the legislation assumes that all parties have paid for access at point of connection and that the costs imposed on other systems are funded through the ITC mechanism and non-discriminatory market based congestion management charges.

5 UK Tariffs & Compliance with EU Regulation

5.1 Background to UK Tariffs

All users of the GB transmission network are subject to Use of System charges. Transmission Network Use of System (TNUoS) charge reflects the cost of installing, operating and maintaining the wider Transmission system. BSUoS charges reflect the cost of operating the system in real time.

The Transmission Network Use of System (TNUoS) incorporates within it the principle of locational charging based on a user's distance from a central node. This has been used by National Grid within its charging approach for England and Wales since 1990. It was subsequently extended to the whole of Great Britain with the introduction of a single electricity market through the British Electricity Transmission Trading Arrangements (BETTA) on 1st April 2005.

The ITC mechanism is also based on a similar distance charge for MWKm travelled by transits in determining compensation for TSOs. As with TNUoS the level of revenue under the ITC is adjusted to meet a specified total level (currently capped at €100m).

TNUoS charges are paid by electricity generators and suppliers for using the high voltage electricity transmission network in Great Britain. In the context of the GB market, Interconnectors are currently treated in the same way as generators, when importing to the GB market they pay Generation TNUoS, and if exporting out of the GB market (off-taking), they would pay Demand TNUoS (load).

The methodology used to calculate TNUoS Charges is designed to provide transmission users with efficient investment signals that reflect the cost of establishing and running transmission infrastructure. This signal, when incorporated into a user's individual financial appraisal, assists in the development of an economically efficient transmission system.

Most of the GB demand is in the south and most GB generation is in the north of England and Scotland. Consequently generation tariffs are relatively higher in the north and relatively lower in the south reflecting the need to reinforce the transmission system to accommodate more generation flows from the north. Likewise demand tariffs are relatively higher in the south and lower in the north reflecting the need for reinforcements to facilitate flows to the south.

Removing the locational signal provided by TNUoS may be seen as removing locational signal on parties who import and export into and from GB. However, the intent of the Regulation is that once the mandatory ITC mechanism is in place, this signal is to be provided through the payments and receipts made under the ITC mechanism. For example, if an Interconnector is connecting to GB in the north the

ITC should reflect the cost that it imposes on the GB system back onto the appropriate TSO, which will then through its own national charging system apply the appropriate signals.

5.2 Treatment of Interconnectors as a Class of User

As set out in NGET's licence, non-discrimination is a cornerstone within the GB framework, providing a level playing field for all users to ensure the most efficient outcome for end consumers i.e. all users are exposed proportionally to the costs they cause. Under the TNUoS methodology, Interconnectors are currently treated the same manner as any other users.

However, the Regulation defines an interconnector as "a transmission line which crosses or spans a border between member states and connects transmission systems of member states". As such, a distinction may be drawn between Interconnectors and producers (generation) / consumers (load).

Furthermore EU Directive 2003/54/EC defines a producer as 'a natural or legal person generating electricity' and whilst this directive does not define a 'consumer', it refers to 'customers' as the point of consumption. As such, in the context of the EU Internal Market in Electricity interconnectors are neither producers nor load, but part of the overall infrastructure facilitating the wider market. As a consequence of this review and in the context of the proposed adoption of a mandatory ITC mechanism, we believe that Interconnectors should now be treated as a separate class of user, and that they should no longer be treated as a generator or demand (producer or load) for these charging purposes.

5.3 Treatment of UK TNUoS Charges

Users that inject power onto the GB Transmission System are subject to annual charges reflecting the costs associated with provision and utilisation of the GB Transmission System. In respect of generation or an interconnector this is based on their Transmission Entry Capacity (TEC).

TNUoS tariffs are calculated annually on an ex-ante basis in accordance with the charging methodology. The methodology is approved by the Authority and is available from the National Grid website⁴ along with the tariff derived from its application.

The revenues recovered under TNUoS are split between generation (27%) and demand (73%) and contain both a locational element and non-locational (residual) element. The aim of the locational component is to provide the market with a signal that reflects the impact that Users at different locations would have on transmission investment. The non-locational element permits transmission asset owners to recover the remainder of their Maximum Allowed Revenue (MAR) as agreed with the Authority. NGET recovers these revenues on behalf of all transmission asset owners.

Charges for generation are based on Transmission Entry Capacity (TEC) as an explicit measure of their capacity. Unlike generators, demand users do not have an explicitly stated capacity. To provide an equivalent proxy capacity for demand, half-hourly metered user charges are based on their metered consumption on the three highest demand periods occurring during November to March; each peak period

⁴ <http://www.nationalgrid.com/uk/Electricity/Charges/chargingstatementsapproval/>

being separated by at least 10 clear days (this is known as the Triad). Non half-hourly demand charges are based on their metered energy over 16:00 to 19:00 over the same period.

The Regulation permits a TSO to charge Producers and Consumers ('load') for access to the wider transmission system i.e. TNUoS charges are permissible only for generation and demand.

As explained above, an interconnector is defined under the Regulation as transmission and TSOs are compensated for cross-border flows under the ITC mechanism. As a result, once the mandatory ITC mechanism is in place, Interconnector flows would become neither production nor consumption, and therefore TNUoS generator and demand charges would no longer be appropriate. **It is therefore proposed that TNUoS charges should no longer be applied to Interconnectors.**

Also, given that Interconnector flows are neither production (generation) nor consumption (demand), it follows that any off-take when exporting from the GB system is not treated as GB demand when setting the GB tariff over the Triad period.

In addition to being consistent with the Regulation, removing Interconnector exports from the definition of Triad demand would ensure that the GB tariff is based on net GB demand rather than any wider European market influences. **It is therefore also proposed that exports caused by Interconnectors are excluded when determining the Triad periods.**

5.4 Other Consequential Changes

Within this consultation, we have not identified any wider consequential changes within other framework documents that would prevent this proposal progressing. We are aware that there may be other issues related to access rights and compensation arising from this change.

We seek views from industry as to whether they believe there are any significant areas that would need to be addressed: we would anticipate taking these forward separately from this consultation.

6 Proposal

In summary, for the above reasons, it is proposed that:

- Interconnectors are treated as a separate class of transmission users as distinct from generation or demand;
- Interconnector owners are exempt from both TNUoS demand and generation charges;
- Interconnector flows are not included when determining the Triad demand periods upon which GB demand charges will be calculated;
- Interconnector flows will continue to be modelled in the transport model to provide the best forecast of the background system flows.

The above proposals would be incorporated into the charging methodology statements to take effect as of 1st October 2010.

For indicative purposes, Annex A shows the impact that such changes would have made on the 2010/11 tariffs. This indicative tariff reflects the removal of all Interconnector TEC from the generation charging base and reduction of 100MW from the half-hourly demand charging base for the Moyle Interconnector.

7 Assessment against Relevant Objectives

In raising this consultation, National Grid has considered the proposal against its relevant objectives.

Developments in the Transmission Business

In the context of the imminent introduction of a mandatory Inter TSO compensation (ITC) mechanism and with the introduction of the third package of EU legislation that further promotes the single Internal Market in Electricity, National Grid believes that these changes reflect the EU Regulation as set out within this document.

Facilitation Competition

National Grid believes that this proposal better meets the relevant objective of facilitating competition.

Greater cross-border trading would be encouraged. The price differential that drives trades between the GB and other EU markets would no longer need to account for TNUoS therefore the number of opportunities where beneficial trades could take place would increase. GB consumers should also benefit from more competitive prices as a consequence of the greater trading opportunities that should arise.

Should market conditions arise where there are increased opportunities for exports, we would anticipate that this would also stimulate the development of additional generation connecting to the GB system and improve plant margins.

Cost Reflectivity

Fundamentally it is consumers and producers that benefit from the ability to buy or sell power across different markets. An Interconnector is essentially an extension to transmission systems that facilitates this process and the consequent impacts on the transmission system should be covered through the ITC mechanism.

NGET's charging methodology is designed to provide efficient investment signals to generation and demand that connects to the GB transmission system. The tariffs derived from its application should therefore reflect this. Removing Interconnector exports from determining Triad charges ensure that the GB tariff reflects only GB consumption.

8 Responses

Responses are invited on this consultation document. Responses are preferred via email and should be sent to Iain.Pielage@uk.ngrid.com by close of business on 26th August 2010.

All responses will be published on the National Grid charging website, unless clearly marked confidential within the response.

Alternatively, Users can send their comments in writing, addressed to:

Iain Pielage
Electricity Charging & Access Development
National Grid Electricity Transmission Ltd
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

If you have further queries, please do not hesitate to contact Iain on 01926 656360.

Appendix A – Indicative Impact on GB Transmission charges.

This appendix provides an indication of the impact of removing TNUoS charges from Interconnector Users. The information below compares the 2010/11 tariff, as set out in the Statement of Use of System charges, 1-April-10 that includes interconnectors with an indicative tariff had the charges not been applied for that year.

The basis for the TNUoS tariff is set out in the Statement of the Use of System Charging Methodology. It is comprised of two separate elements. The first is a locationally varying element derived from the DCLF ICRP transport model to reflect the cost of capital investment in, and the maintenance of, the GB transmission system. The second is a non-locationally varying element related to revenue recovery. The combination of both these elements forms the TNUoS Tariff.

Under the proposed changes, it is assumed that the generation and demand background, including flows on the interconnectors, will remain substantially unchanged. Consequentially, there would be no changes to the underlying transport model data.

For the residual tariff element, the charging base over which generation and demand tariffs are calculated have been reduced to reflect the revised levels of generation and demand in those zones where Interconnectors operate.

In deriving this indicative tariff, all Interconnector TEC was removed from the generation charging base and the half-hourly demand charging base was reduced to reflect exports on the Moyle Interconnector. Given that NGET will be recovering the same allowed revenues on behalf of transmission asset owners, but over a reduced charging base, as expected the TNUoS tariff would increase marginally to reflect this.

The overall effect on the revised charging bases is that it would add approximately £0.04p/kW to generation tariffs for all generation zones and add approximately £0.02p/kW for half-hourly metered demand: the tariff for non half-hourly demand changes negligibly (less than £0.003p/kWh).

Table 1: Comparison of Indicative Generator charges against original 2010/11 tariff (including small generator discount)

Generation		2010/11 Tariffs	2010/11 Tariffs Including Proposal	Difference
Zone No.	Zone Name	Zonal Tariff (£/kW)	Zonal Tariff (£/kW)	Abs
1	North Scotland	20.08	20.12	0.04
2	Peterhead	18.71	18.75	0.04
3	Western Highland & Skye	22.79	22.83	0.04
4	Central Highlands	17.63	17.68	0.04
5	Argyll	13.34	13.38	0.04
6	Stirlingshire	13.44	13.48	0.04
7	South Scotland	12.49	12.53	0.04
8	Auchencrosh	10.91	10.95	0.04
9	Humber & Lancashire	5.42	5.46	0.04
10	North East England	8.79	8.83	0.04
11	Anglesey	6.17	6.21	0.04
12	Dinorwig	5.50	5.54	0.04
13	South Yorks & North Wales	3.59	3.64	0.04
14	Midlands	1.56	1.61	0.04
15	South Wales & Gloucester	0.39	0.43	0.04
16	Central London	-6.41	-6.37	0.04
17	South East	0.81	0.85	0.04
18	Oxon & South Coast	-1.36	-1.32	0.04
19	Wessex	-2.64	-2.59	0.04
20	Peninsula	-5.87	-5.83	0.04

Table 2: Comparison of Indicative HH demand charges against original 2010/11 tariff

Demand		2010/11 Tariffs	2010/11 Tariffs Including Proposal	Difference
Zone No.	Zone Name.	HH Zonal Tariff (£/kW)	HH Zonal Tariff (£/kW)	Abs
1	Northern Scotland	5.87	5.89	0.02
2	Southern Scotland	11.22	11.24	0.02
3	Northern	14.52	14.54	0.02
4	North West	18.43	18.45	0.02
5	Yorkshire	18.34	18.37	0.02
6	N Wales & Mersey	18.89	18.91	0.02
7	East Midlands	20.93	20.95	0.02
8	Midlands	22.69	22.71	0.02
9	Eastern	21.84	21.86	0.02
10	South Wales	22.52	22.55	0.02
11	South East	24.63	24.65	0.02
12	London	26.76	26.78	0.02
13	Southern	25.49	25.51	0.02
14	South Western	26.06	26.08	0.02

Table 3: Comparison of Indicative non HH demand charges against original 2010/11 tariff

Demand		2010/11 Tariffs	2010/11 Tariffs Including Proposal	Difference
Zone No.	Zone Name.	NHH Zonal Tariff (p/kWh)	NHH Zonal Tariff (p/kWh)	Abs
1	Northern Scotland	0.79	0.79	0.00
2	Southern Scotland	1.55	1.55	0.00
3	Northern	1.99	2.00	0.00
4	North West	2.55	2.56	0.00
5	Yorkshire	2.52	2.52	0.00
6	N Wales & Mersey	2.63	2.63	0.00
7	East Midlands	2.89	2.89	0.00
8	Midlands	3.18	3.19	0.00
9	Eastern	3.03	3.03	0.00
10	South Wales	3.03	3.03	0.00
11	South East	3.38	3.38	0.00
12	London	3.60	3.61	0.00
13	Southern	3.54	3.54	0.00
14	South Western	3.55	3.56	0.00

Appendix B – Proposed Changes to the Statement of the Use of System Charging Methodology.

Amend Chapter 4 to remove Interconnectors from parties liable for demand charges.

Chapter 4: Demand Charges

Parties Liable for Demand Charges

4.1 The following parties shall be liable for demand charges:

- The Lead Party of a Supplier BM Unit;
- Power Stations ~~or Interconnector Asset Owners~~ with a Bilateral Connection Agreement;
- Parties with a Bilateral Embedded Generation Agreement

Remove paragraph 4.8

~~Directly Connected Interconnectors and those capable of exporting more than 100MW to the Total System~~

~~4.8 — The Chargeable Demand Capacity for Interconnectors will be the average net, metered import of the Interconnector during the Triad (including Interconnector errors with the exception of Emergency Assistance actions).~~

Modify Triad definition to exclude Interconnector exports

The Triad

4.10 The Triad is used as a short hand way to describe the three settlement periods of highest transmission system demand within a Financial Year, namely the half hour settlement period of system peak demand and the two half hour settlement periods of next highest demand, which are separated from the system peak demand and from each other by at least 10 Clear Days, between November and February of the Financial Year inclusive. Exports on directly connected Interconnectors and Interconnectors capable of exporting more than 100MW to the Total System shall be excluded when determining the system peak demand. An illustration is shown below.

Amend Chapter 5 to remove Interconnectors from parties liable for generation charges.

Chapter 5: Generation charges

Parties Liable for Generation Charges

5.1 The following CUSC parties shall be liable for generation charges:

i) Parties of Generators that have a Bilateral Connection Agreement with National Grid.

ii) Parties of Licensable Generation that have a Bilateral Embedded Generation Agreement with National Grid.

~~iii) Interconnector Asset Owners that have a Bilateral Connection Agreement with National Grid and/or Interconnector asset Owners of Interconnectors capable of exporting 100MW or more to the Total System.~~

Remove paragraph 5.8, 5.9 and 5.14. Remove references to Interconnectors from paragraphs 5.10 through 5.15

Generation with positive wider tariffs

~~5.8 The Chargeable Capacity for an Interconnector with positive wider generation tariffs is the highest TEC applicable to that Interconnector for that Financial Year. An Interconnector should not exceed its TEC as to do so would be in breach of the CUSC, except where it is entitled to do so under the specific circumstances laid out in the CUSC (e.g. where a User has been granted Short Term Transmission Entry Capacity)~~

5.10 For Power Stations ~~and Interconnectors~~, the short term chargeable capacity for LDTEC with positive generation tariffs referred to in Paragraphs 5.7 ~~and 5.9~~ will be the capacity purchased either on a profiled firm or indicative basis and shall be assessed according to the capacity purchased on a weekly basis.

Generation with negative wider tariffs

5.11 The Chargeable Capacity for Power Stations ~~and Interconnectors~~ with negative wider generation tariffs is the average of the capped metered volumes during the three settlement periods described in 5.12 below, for the Power Station (i.e. the sum of the metered volume of each BM Unit associated with Power Station in Appendix C of its Bilateral Agreement) ~~or Interconnector~~. A Power Station ~~or Interconnector~~ should not exceed its TEC as to do so would be in breach of the CUSC, except where it is entitled to do so under the specific circumstances laid out in the CUSC (e.g. where a User has been granted Short Term Transmission Entry Capacity). If TEC is exceeded, the metered volumes would each be capped by the TEC for the Power Station ~~or Interconnector~~ applicable for that Financial Year. For the avoidance of doubt, TNUoS Charges will be determined on the TEC held by a User as specified within a relevant bilateral agreement regardless of whether or not it enters into a temporary TEC Exchange (as defined in the CUSC).

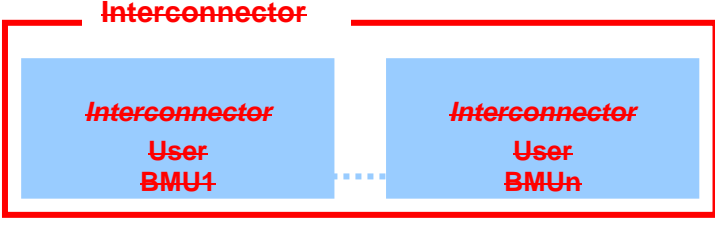
5.12 The three settlement periods are those of the highest metered volumes for the Power Station ~~or Interconnector~~ and the two half hour settlement periods of the

next highest metered volumes which are separated from the highest metered volumes and each other by at least 10 Clear Days, between November and February of the relevant Financial Year inclusive. These settlement periods do not have to coincide with the Triad.

~~5.14 The short-term chargeable capacity for Interconnectors with negative generation tariffs is any approved STTEC or LDTEC applicable to that Interconnector during a valid STTEC Period or LDTEC Period, as applicable.~~

5.15 For Power Stations ~~and Interconnectors~~ with negative generation tariffs, the short-term chargeable capacity for LDTEC referred to in Paragraphs 5.13 ~~and 5.14~~ will be the capacity purchased either on a profiled firm or indicative basis and shall be assessed according to the capacity purchased on a weekly basis.

Remove diagram "Interconnector Asset Owner" from Appendix TN-5: Classification of parties for charging purposes.

INTERCONNECTOR ASSET OWNER	
	
<p>Demand Charges See 4.8.</p>	<p>Generation Charges See 5.1 iii). For Interconnectors in positive zones, see 5.3 to 5.4 and 5.7 to 5.8. For Interconnectors in negative zones, see 5.3 to 5.4, 5.9 to 5.10 and 5.12.</p>