

Observations on FCC methodology and values – 19 March 2019

Methodology

1. Methodology document needs to include aggregate or sum of in every section for clarity. Else divide by number of days makes no sense.
2. It is not clear if future annual bookings are considered?
3. Justification of selection of parameters as per TAR NC article 26 1 (a) i, is absent
4. There is no justification provided for a different approach for GDN offtakes Y-1 vs Y -2 at all other offtakes, this allows adjustments up/down to be reflected more rapidly in GDN values than for other sites
5. Why are PARCA reservations / bookings are not incorporated into the GDN FCC values
6. The use of Y-1 seems to implicitly assume no short-term bookings by GDNs – can this be demonstrated / guaranteed. Does UNC prevent DN Users from making short term bookings?
7. Updated Forecast – appears to be a defined term, is it defined in the new legal text, it is not in the current UNC defined terms listings?
8. Does the Updated Forecast relate to a particular scenario?
9. Is it a peak day forecast?
10. The GTYS charts and data SS does not contain data at the granularity required for FCC.
11. How are site specific values determined?
12. What values are used for new sites, without a PARCA reservation?
13. Exceptions in Chapter 4: a means to deal with difficult issues but does not seem to have been applied to FCC in ss [NG specifically says it is not using exceptions, but will do later for actual charges – presumably in some unpredictable random way](#)

Values

1. Storage sites and interconnectors still have no forecast values – which leads to a query of the forecast used
2. Avonmouth refill,, Deeside¹, Rough injection, Glenmavis injection, Gowkhal (Longannet), Dynevor refill, Rough refill, have FCC values for all 6 years from flows or bookings in 2017/18, but are closed – surely this should be covered by exception rule?
3. Bacton GDN – it is not clear if the FCC includes the PARCA capacity from 1/3/21 , FCC falls then is flat
4. Ipsden and Ipsden 2 have PARCA bookings from 1/2/19 but the FCC values are below these
5. Keadby blackstart has 0 forecast values until 2022 then sizeable values appear?
6. Mappowder 19/20 FCC is below PARCA quantity
7. Peterborough EYE (TEE) and Silk Willoughby not clear that PARCA bookings from 1/3/21 are included in FCC values which are flat at the booked level of 17/18
8. Peterhead has no forecast from 2022, so is assumed to close ?
9. Knottingley PS has forecast values from 2022 ,but no PARCA
- ~~10. Hirwuan PARCA reservation should start on 1/10/20~~
- ~~11. Drax PARCA reservation values are missing~~
- ~~12. Tilbury Marshes is missing but has PARCA reservation from 1/12/20~~
13. Treatment of Theddlethorpe and Caythorpe needs considering

¹ <http://www.tritonpower.co.uk/deeside>