

E.ON Comments

24th Jun 2012

Re: NDM Gas Demand Allocation Profile data for Gas Year 2013/2014

With regards to the draft NDM Allocation Profile parameters issued in early June 2013 for use in Gas Year 2013/14, we would like to raise the following points of consideration.

Query 1. DAF Summer shape

We have become aware that a selection of DAFs have had their summer shaping dramatically reduced. The affected DAFs do not appear to be connected but are generally in the higher bands. Please can you let us know your views on what is the driver behind this reduction on these particular EUC's?

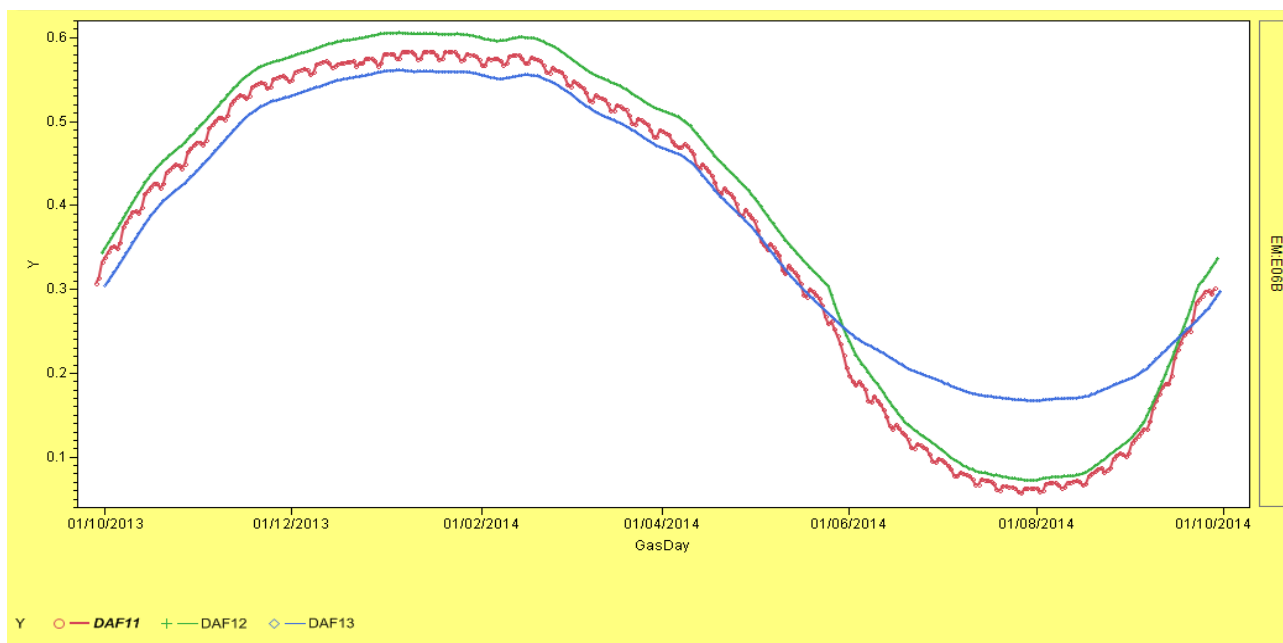


Fig 1. DAF values for EM:E1306B. Years prior to 2013/14 mapped to match day of week with 2013/14.

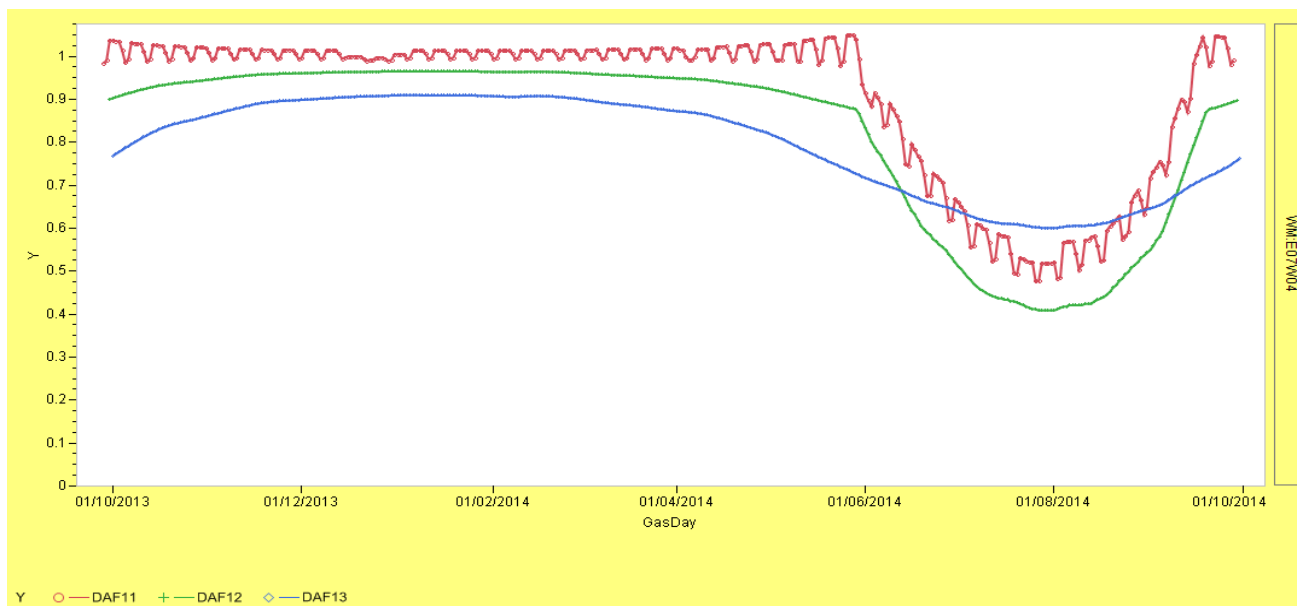


Fig 2. DAF values for WM:E1307W04. Years prior to 2013/14 mapped to match day of week with 2013/14.

Query 2. NW:E1307W04 and WN:E1307W04 have been kept high over summer

As can be determined from the graphs below (fig 3), the summer period for NW:E1307W04 and WN:E1307W04 has been kept high in comparison to previous years. This has introduced a monthly movement of over 40% in July. What is the driver behind this large movement?

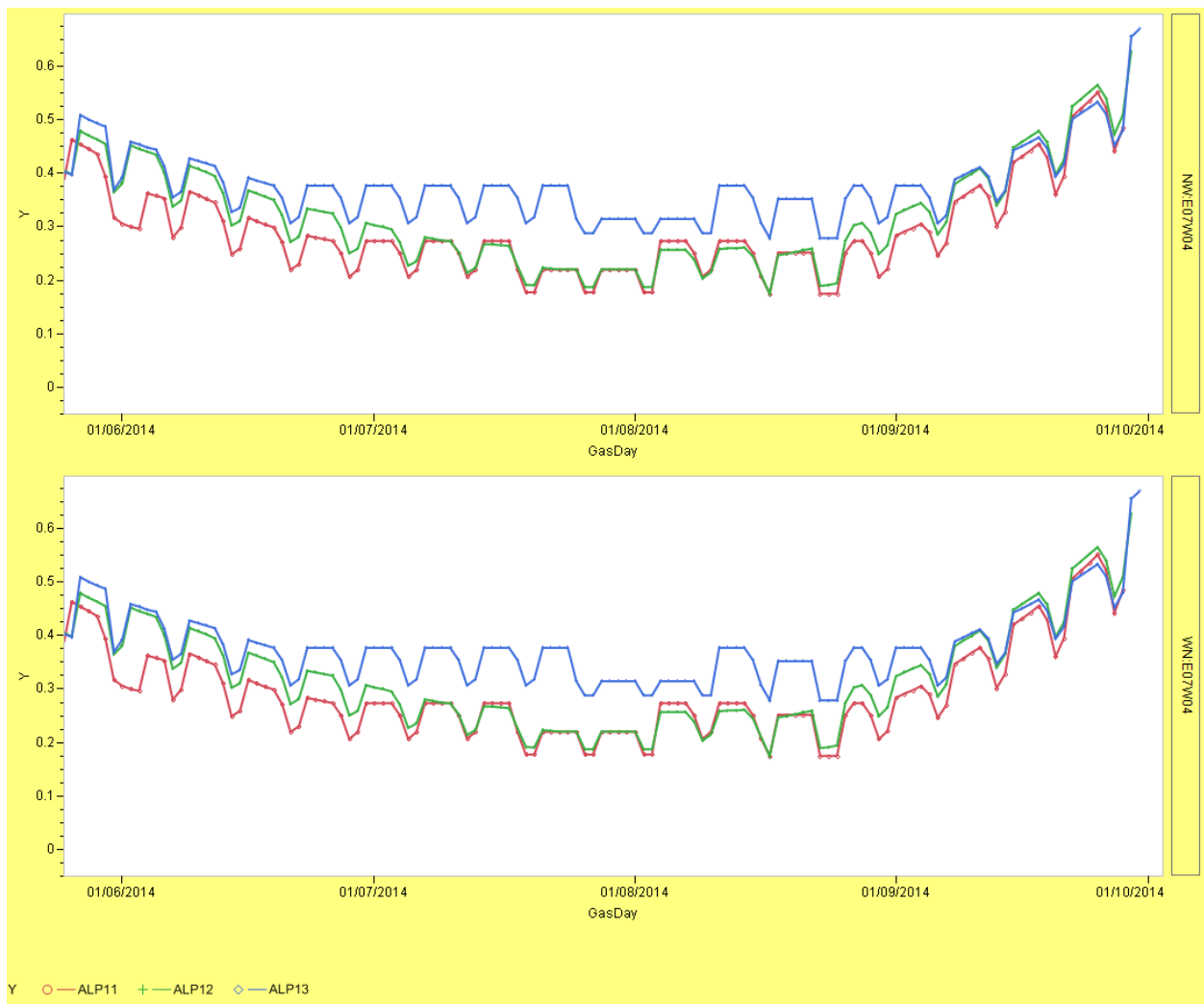


Fig 3. ALP values for NW:E1307W04 and WN:E1307W04. Years prior to 2013/14 mapped to match day of week with 2013/14.

Query 3. Early May Bank Holiday ALP shape

The first May bank holiday appears to have an unusual shape, with the ALPs for several EUCs sitting higher than previous years. While bank holiday behaviour may be influenced by the historic shift due to the royal wedding is there a more concrete change in behaviour for this bank holiday that could be driving this? It would be preferable to understand any move so we can be sure it will replicate forwards, as this is our underlying assumption for the profiles.

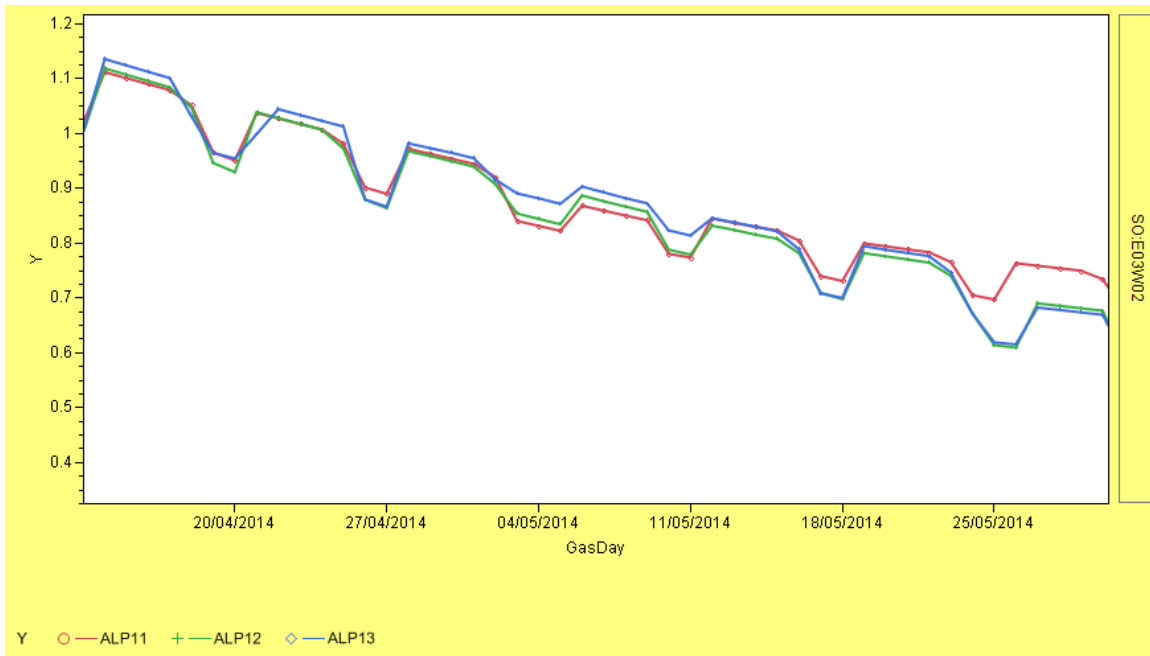


Fig 4. ALP values for SO:E1303W02. Years prior to 2013/14 mapped to match day of week with 2013/14.

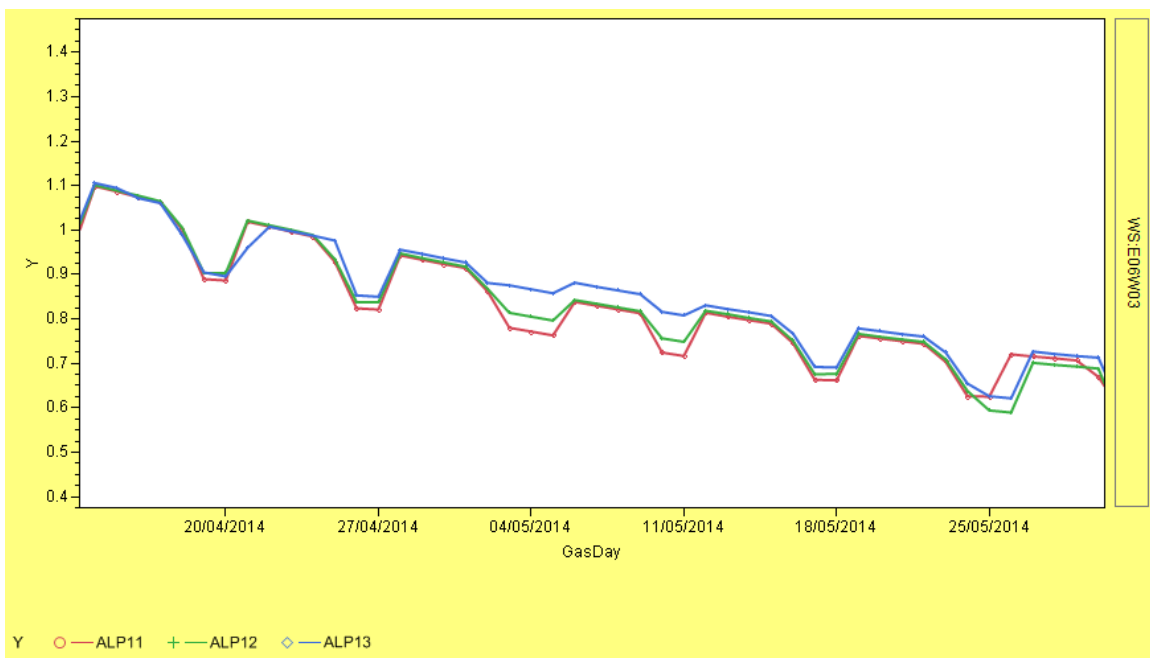


Fig 5. ALP values for WS:E1306W03. Years prior to 2013/14 mapped to match day of week with 2013/14.

In addition to the issues raised we would like to make the following comments:

As we have mentioned in the past few years we would like to see phase 2 of Mod 330 expedited to ensure that the revised climate change methodology is available in time to be used to revise seasonal normal. I am sure you are aware that we disagreed strongly with the seasonal normal currently live and it was the assurance it could be updated quickly that prevented us asking for disapproval of the values. We are therefore disappointed that it now looks tight to get a proper review a full five years after implementation.

We would also like to ask how the analysis of the day of week shape seen in the scaling factor has progressed and whether the analysis into the profiles has highlighted what may be driving this as we would hope to remove this issue in the next gas year.