E.ON Comments

19th Jun 2015

Re: NDM Gas Demand Allocation Profile data for Gas Year 2015/2016

With regards to the draft NDM Allocation Profile parameters issued in early June 2015 for use in Gas Year 2015/16, we would like to raise the following points of consideration.

Query 1. DAF Flatness for EM:E06W01

There are a few EUCs that have had the DAFs for 2014/2015 flat and now have a yearly shape. However for the year 2014/2015 EM:E06W01 had a flatness to it which is no longer present for the DAFs in 2015/2016 and also didn't appear in the DAFs for 2013/2014. What is it that drives this behaviour in the changes for this EUC?

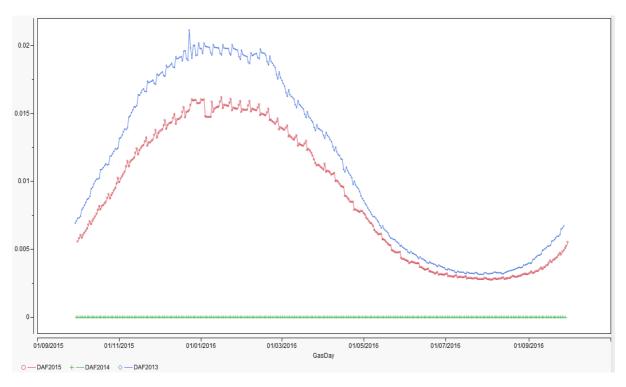


Fig 1. DAF values for EM:E06W01. Years prior to 2015/2016 mapped to match day of week with 2015/2016

Query 2. Inverse summer shape for several EUCs

There are several EUCs that have a summer shape applied to them, in most which there is a significant dip over the summer. However in several of these EUCs the dip no longer appears in the DAFs for 2015/2016. Instead it continues at an upward trend before it begins to drop off. What has caused this sudden change as it was not seen in the previous years?

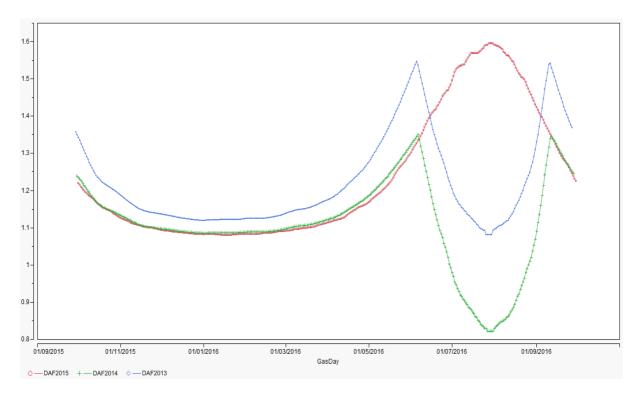


Fig 2. DAF values for SC:E03W02. Years prior to 2015/2016 mapped to match day of week with 2015/2016

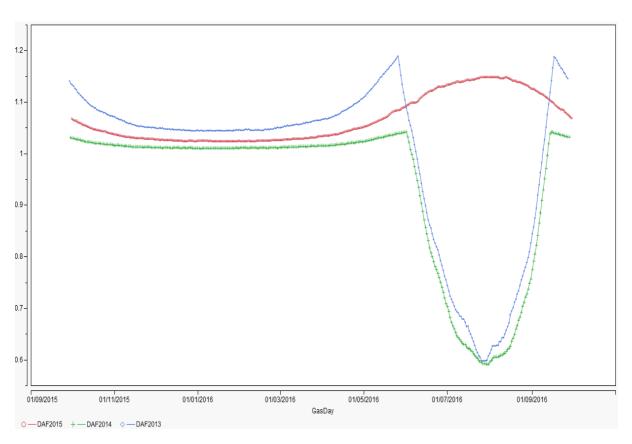


Fig 3. DAF values for NW: E06W04. Years prior to 2015/2016 mapped to match day of week with 2015/2016

Query 3. Christmas Flatness

We are aware that the ALPs for 2015/2016 have an extended Christmas holiday shape applied to it for the first time. To build upon this the EUC EA:E09B shows a flatness to its Christmas shape that isn't seen at other EUCs ranging from 26/12/2015 to 4/1/2016. What has caused this extended holiday shape compared to other EUCs?

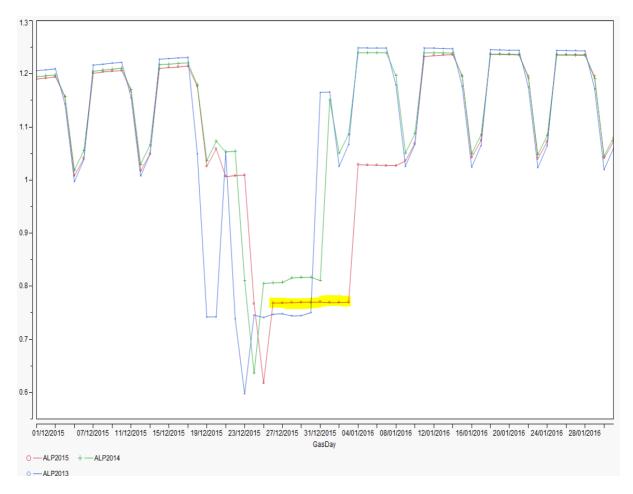


Fig 4. ALP values for EA:E09B. Years prior to 2015/2016 mapped to match day of week with 2015/2016. Covers Christmas period with highlighted extended holiday shape not seen in other EUCs.

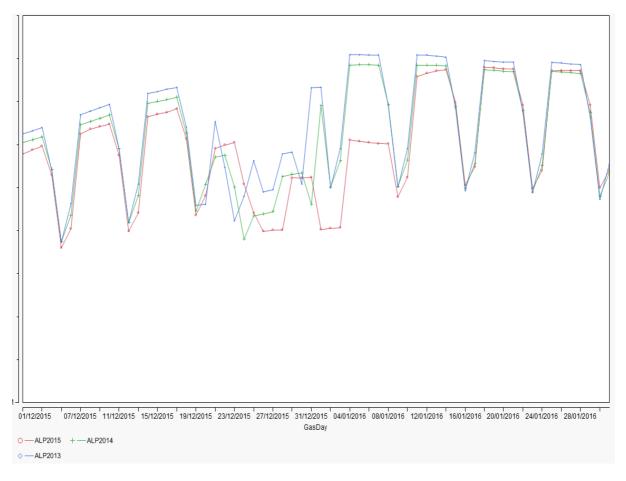


Fig 5. ALP values for EA:E08B. Years prior to 2015/2016 mapped to match day of week with 2015/2016. Covers Christmas period without the extended holiday shape.

We understand that the amendments to the holiday parameters were implemented in 2011, and therefore didn't get agreed in time for implementation in 2011/12 however we would like to know why the holiday shaping for Christmas has been applied for the 2015/2016 ALPs and was not to the prior year of 2014/2015 ALPs.

We are also satisfied with the current Pre-Payment set as well as with the Nexus ALP and DAF sets for 2015/2016.