

Transmission Planning Code PARCA Version Consultation 2015

Consultation Response

Energy UK is the trade association for the energy industry. We represent over 80 members made up of generators and gas and electricity suppliers of all kinds and sizes as well as other businesses operating in the energy industry. Together our members generate more than 90 per cent of the UK's total electricity output, supplying more than 26 million homes and investing in 2012 more than £11 billion in the British economy.

Energy UK welcomes the opportunity to provide comments to this consultation, we note that there are a number of places in the document that seem to suggest that the existing entry capacity auctions and annual and ad-hoc exit capacity processes can be used to drive investment plans by National Grid. However it is our understanding that whilst these processes can be used to signal the need for additional or incremental capacity, where that capacity cannot be met from obligated capacity, via substitution or the release of non-obligated capacity that a PARCA will be required where National Grid needs to undertake investment to deliver the required capacity.

Below we identify comments against the relevant sections

Section 3.2 second paragraph

This seems to emphasise that entry capacity auctions and exit bookings will be the main determinant of investment when this should be the PARCA commitments above obligated levels

Section 3.2.2

This section could usefully reference the PARCA demonstration data that would need to be provided before capacity is allocated, essentially this would demonstrate that the customer project is proceeding before National Grid undertakes investment

Section 3.3

National Grid determination of its investment plan should reference PARCA reservations and allocations rather than just long term entry auctions and exit capacity bookings

Section 3.4.2

Paragraph 1 needs to be amended to say in order to trigger investment at entry or exit a PARCA will be needed

The new paragraphs 2 & 3 are fine

Paragraph 4 needs to reflect that a revenue driver would be expected to be in place prior to allocation of additional entry or exit capacity rather than the auction processes

Section 4.1 paragraphs 2&3

These need to be amended to reflect that PARCAs can drive investment rather than auctions

Section 4.3

Refer to comments under section 3.2.2 above

Section 4.4 last sentence

Needs to reference PARCA demonstration information and allocations.

Section 4.5

Second sentence needs to reference PARCAs as a means of commitment to entry capacity and in determining any incremental (above obligated) quantity

Indent 1. Needs to reference the PARCA

Figure 1

Needs to identify role of PARCAs

Section 5.1

Second paragraph penultimate sentence should read.

*Where specific reinforcement to the system **is** required, developers can **only** secure capacity through a PARCA*

Section 5.3

Refer to comments under section 3.2.2 above

Section 5.4

This also needs to refer to PARCA reservations and allocations

Figure 2

Needs to identify role of PARCAs

Section 6.2, 6.3, 6.4,6.5

Does this section need to note the change to the start of the gas day to 0500 from 1 October 2015? Is it expected that maximum linepack will migrate to 0500?

Section 6.6

Is any account taken of within-day flow variations from 1/24th rate at entry points. Since this code was first drafted these have become better understood and so could be considered foreseeable.

Section 6.7.1

End of first paragraph, what does this three year period relate to does that need to change to reflect the timescale under the current planning regime?

Energy UK would be happy to discuss these points further, in the first instance please contact Julie Cox, details below.

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