

GT SECTOR	
REFERENCE NUMBER:	CATEGORY: Licence Condition
LICENCE CONDITION NUMBER: <i>(if relevant):</i>	SpC 9.13
TITLE:	Capacity Requests, Baseline Capacity and Capacity Substitution
RELEVANT LICENCE CONSULTATION QUESTIONS <i>(if any):</i>	
RELEVANT ISSUES LOG:	3.11+9.13, 5F+5G, Incremental Capacity, Capacity Req-Cap-Sub Issues Log
POLICY ISSUES	
<ul style="list-style-type: none"> Data publishing 	<ul style="list-style-type: none"> PART E. 9.13.11. Summary table does not include Non-incremental obligated capacity in the table requirements. This means the impact of the substitutions published in Part D are not summarised and would need to be calculated. Suggest inclusion of this category of capacity.
DRAFTING ISSUES	
<ul style="list-style-type: none"> Definitions Part A 9.13.5(c) 	<ul style="list-style-type: none"> Introduction. 9.13.1 / Part A 9.13.4. Wording is currently 'licensee receives a request for Firm Entry Capacity or Firm Exit Capacity'. Definition of Firm capacity provided in the annex is linked to a user's contractual right to flow - a 'request' could be interpreted as any booking of firm capacity made through standard auction processes etc. and may lead to a large number of unnecessary notices being published. It is believed the intention of this condition is regarding the request of incremental obligated capacity which may be dealt with through the use of substitution or funded incremental subject to the application of the capacity methodology statements. Issue raised during LDWG but wording was maintained, but with linked provisions - however this does not appear as clearly defined in the licence. We suggest: "Firm capacity request some or all of which constitutes Incremental Obligated Capacity" The cross reference should be to special condition 3.11 Part B. 9.13.7: Clarification needed in paragraphs (e) and (f). Through the attempted simplification of these sentences, it now no longer refers back to the volumes of non-incremental that would be the result of capacity

<ul style="list-style-type: none"> Part B. 9.13.7 Part B 9.13.7(d) Part C 9.13.9 Part F definitions Part F definitions 	<p>substitution in (b) and funded incremental in (c), which makes these unclear or have elements that are non-applicable in some circumstances.</p> <ul style="list-style-type: none"> The cross reference to 6(c) of 9.18 is wrong as this does not exist. Is it perhaps intended that this is seeking to refer to 9.18.4/5 a) and b) in terms of the licensee determining how capacity should be dealt with? Please can Ofgem clarify? 9.13.9 should refer to Licence Baseline Exit Capacity The GT definitions annex includes a definition of Zero Licence Baseline Entry Capacity Table but the term is not used. Should the definitions of Zero Licence Baseline Entry and Exit Points refer to “any <u>baseline</u> funding allowance”?
FINANCE ISSUES	
SUPPORTING INFORMATION	
OFGEM ENGAGEMENT:	LDWG