

UNC Consultation Response – Respondent Name : BP

UNC Document

Section	Section Reference	Response
Introduction		
TPD Section A – System Classification		
TDP Section B – System Use and Capacity	1.2.5 1.2.9 3.8	Typo error “in” should be “as”. Missing end of bracket at end of 1.2.9(c) Generally the defined terms need to be consistently dealt with throughout the document.
TPD Section C – Nominations	1.1.7	In the business rules this mentions NTS “may” notify, this has changed to “shall”. Why have amendments been made to the renomination provisions?
TPD Section D – Operational Balancing..	1.4.5	Does not read correctly; there may be typos; looks like “for the purposes of paragraph 1.4.4” is superfluous.
TPD Section E – Daily Quantities...		
TPD Section F – Balancing Charges etc		
TPD Section G – Supply Points		
TPD Section H – Demand Estimation..		
TPD Section I – Entry Requirements		
TPD Section J – Exit Requirements	3.5.7 4.3.1) 4.3.2) 4.3.2)	Please explain why compensation should not be paid by the downstream transporter. It is not clear why the provision of these will need to apply to the Network Exit Provisions of a CSEP in a multi-transporter environment where they were not necessary before. BP needs more time to consider the implications of Exit provisions, as well as clarification on the impact these have for NExAs.
TPD Section K – Operating Margins	3.11.3	Why has the wording in 4.3.4 changed from Storage to Operating Margins Facility?
TPD Section L – Maintenance etc...	3.2.1	This amendment does not seem to be directly related to the multi-transporter environment – what is the reason for this change?
TPD Section M – Supply Point Metering	3.8.10	In line 5 delete the excess “the”.
TPD Section N – Shrinkage	1.6 4.2.2 4.2.3	Why have the provisions for Shrinkage Scheduling been deleted? Why has the reference to a Shrinkage Provider making Input and Output Noms and Re-Noms been deleted? Why has the paragraph referring to the Shrinkage Provider applying for Storage Capacity been deleted?
TPD Section O – System Planning		

TPD Section Q – Emergencies		
TPD Section R – Storage	1.5.1 4.1.2	The deletions of paras relating to Storage Facilities and LNG Importation Facilities are listed as corrections – are these amendments left over from previous modifications? Could you please clarify? What is the reason for the deletion – is it a correction?
TPD Section S – Invoicing & Payment		
TPD Section U – UK Link	2.8	Would it not make more sense for this to refer to the Transporter Agency?
TPD Section V – General	5.5.3	We question whether this type of information should be disclosed to contractors and would prefer this provision to be deleted.
TPD Section X – EB Credit Management		
TPD Section Z – LNG	5.2(d)	Why has this deletion been made?
OAD Section A – Scope & Classification		
OAD Section B – Connection Facilities		
OAD Section C – Safety & Emergency		
OAD Section D – Measurements		
OAD Section E – Telemetry etc		
OAD Section F – Determination of CV		
OAD Section G – Maintenance		
OAD Section H – Long Term Planning		
OAD Section I – Operational Flows		
OAD Section J – LDZ/LDZ Offtakes		
OAD Section K – LDZ System Entry Points		
OAD Section L – Cost Recovery..		
OAD Section M – Information Flows		
OAD Section N – General		
Modification Rules (Former Section Y)		BP has a general concern that Shipper User rights in the modification process have been diminished in so far as the composition of the Panel has changed to reflect the multi-transporter environment and now look remarkably one-sided.

Transition Document		
General Terms Section A – Dispute Resolution (formally Section T)		
General Terms Section B – General (parts of original Section V)		
General Terms Section C – Interpretation (formally Section W)		

Associate Documents

Section	Section Reference	Response
Agency Services Agreement (ASA)		
Joint Governance Agreement (JGA)		

Incremental Exit Capacity Release (IExCR) Statement		
--	--	--