

UNC Consultation Response – Respondent Name : [Transco]

UNC Document

Section	Section Reference	Response
Introduction		
TPD Section A – System Classification		
TDP Section B – System Use and Capacity		General concerns that the drafting may not be completely workable in practice. At this stage in the consultation process it is impossible to define specific concerns as they relate to application of Business Rules and Principles where the underlying detail is not available. Please see comments under Section J.
TPD Section C – Nominations		
TPD Section D – Operational Balancing..		
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		Although the drafting and business rules of this section are presented as “complete”, without further details in a number of areas of operation of this section it is impossible to form a view of the workability of this section. To date there are no details of Capacity Baselines, Flow Flexibility Baselines, interchangeability factors, prices, etc. In addition there are a number of Business Rules principles which are not yet agreed, for example, whether a User registration is required, whether capacity and flow flex will be available unconstrained within day, whether it is appropriate to apply flow flex rationing at all times or only on days where the system is stressed. Until this information is available, and issues resolved, we are unable to form an opinion whether the drafting is fit for purpose or otherwise. Therefore, although we are unable to raise specific points to be addressed within the final preparation of UNC drafting, we (and other Users) must retain the ability to reserve judgement on the completeness of this section. It is inevitable that any outstanding concerns in this area will of necessity be addressed via the Modification Process post implementation!
TPD Section K – Operating Margins		
TPD Section L – Maintenance etc...		
TPD Section M – Supply Point Metering		
TPD Section N – Shrinkage		
TPD Section O – System Planning		

TPD Section Q – Emergencies		
TPD Section R – Storage		
TPD Section S – Invoicing & Payment		
TPD Section U – UK Link		
TPD Section V – General		
TPD Section X – EB Credit Management		
TPD Section Z – LNG		
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)		Although much progress has been made in revising the Modification Rules since their inclusion within Network Code, the translation of these rules into the UNC has required a number of uncertainties to be resolved. The current status of the rules is more clear but it is still to be determined what constitutes a “Panel Majority” in reaching a recommendation. We share the view expressed by a number of other Users that this issue will require resolution prior to the adoption of any appeals process, but until the nature of this process has been determined this will remain unresolved.

Transition Document		The Transition Document of the UNC is very brief. We have previously raised the importance of clear demarcation of responsibilities between the Transporters pre and post hive-down. This is not adequately determined in this document. We are not yet aware of the precise content of the Transco Short-Form Code and whether these arrangements will be accommodated in that document. Similarly, there is no reference to the limitation date (IQR date) of 1 February 1998 in this document, although it would appear appropriate that this is also contained in the Transco (Short-Form) Code which defines their obligations pre hive-down.
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)		The constitution and operation of the Joint Office appears clear itself. Any concerns in this area relate to the manner in which the Joint Office will operate areas of the contractual framework in terms of what it does and how it does it (vis a vis Mod Rules etc)

Incremental Exit Capacity Release (IExCR) Statement		
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