

UNC Consultation Response – Respondent Name : MGN Gas Networks (UK) Ltd

MATRIX 2 UNC Document

| Section | Section Reference | Response |
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| Introduction | | |
| TPD Section A – System Classification | | |
| TDP Section B – System Use and Capacity | | |
| TPD Section C – Nominations | | |
| TPD Section D – Operational Balancing.. | | |
| TPD Section E – Daily Quantities... | 1.4.1 | Incorrect cross reference, replace E3.5 with E3.4 |
| TPD Section F – Balancing Charges etc | | |
| TPD Section G – Supply Points | 2.5.1 (b) | Typo – therefor should read thereof |
| TPD Section H – Demand Estimation.. | | |
| TPD Section I – Entry Requirements | | |
| TPD Section J – Exit Requirements | 3.11 3.3.7 | Incorrect cross-reference, replace J3.10 with J3.11 This clause is in square brackets and we understand NGT is considering the wording to be inserted in this clause. We will consider the final draft wording in Phase 2 of the consultation |
| 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 | | |

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| TPD Section V – General | 4.2.2 (g) 5.5.3 (i) | Insert “by” after bound Remove [] |
| TPD Section X – EB Credit Management | | |
| TPD Section Z – LNG | | |
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| OAD Section A – Scope & Classification | | |
| OAD Section B – Connection Facilities | 2.1.1 (a) (i) 2.2.4 2.2.6 2.4.1 3.6 3.7.2 & 3.7.3 4.1.1 4.2.1 (a) | Refine drafting to not be of relevance for existing connections Insert in [] six months or other shorter period where agreed and only limited to those works which affect the other party Remove as redundant Insert “knowingly” after nor Insert a provision to reinstate the site to a reasonable and safe condition Remove and rely on 6.2.1 Insert “should not unreasonably withhold” in the brackets Link in with 2.2.4 as per notice period |
| OAD Section C – Safety & Emergency | 2.6.2 (c) | Include LDZ/LDZ offtakes |
| OAD Section D – Measurements | 1.5.1 (b)(ii) 2.2.1 (a) 3.3.1 3.3.5 | Make reference to the upstream Party as the Party making such determination Delete reference to GSMR as not relevant Insert text to require upstream Party to give reasons for the request Allow for reduction in flow where cessation is unsafe |
| OAD Section E – Telemetry etc | 2.3.5 2.5.3 3.2.1 (d) Annex E-2 and E-3 | Insert “at its own cost” after first NTS Should include reference to NTS responsibility for NTS facilities in the event that they fail Insert words to give the effect of mutual co-operation in the commissioning and testing Probably better dealt with in the Communications Document |
| OAD Section F – Determination of CV | 2.2.2 2.3.4 (c) 4.1.5 4.3.1 | Insert “may” in place of “will” and “will endeavour to” after second “DNO” Delete square bracket text Remove “whether negligent or otherwise” Consistent with other notice periods in the OAD allow for another period if agreed by the Parties |
| OAD Section G – Maintenance | 1.2.1 2.3 2.4.2 (a) 2.6.2 (d) Annex G-2 | Clarify that a Relevant Maintenance Day can be more than one maintenance category as referred to in this clause Amend drafting to reflect co-operation between Parties Change five to thirty to ensure it is consistent with TPD obligations Delete as not necessary Modify to identify co-operative process prior to the provision of drafts |
| OAD Section H – Long Term Planning | | |
| OAD Section I – Operational Flows | 2.1.3 2.5 4.2 6.1.1 (b) 6.1.2 | Needs to reflect that OPNs can be profiled during the day, but not within the hour to be consistent with TPD Change 60% to 50% to reflect linepack capability. Insert text to require NTS to provide notice on D-1 In general this needs to accommodate demand forecast errors Provide for a reasonableness test Clarification – can Transco confirm whether a separate statement of the prevailing LDZ stock change is necessary? We would prefer to provide an aggregate demand forecast incorporating the stock component |
| OAD Section J – LDZ/LDZ Offtakes | | |

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| OAD Section K – LDZ System Entry Points | | |
| OAD Section L – Cost Recovery.. | | |
| OAD Section M – Information Flows | | |
| OAD Section N – General | 3.3.1 (b) 7.1.1 (c) | Timescale needs to be provided We are reviewing this clause with our insurers and will comment, if appropriate as soon as we are able |
| Modification Rules (Former Section Y) | SME Code of Conduct | In relation to the draft Code of Conduct as provided by NGT to DISG 37, we wish to record our concerns over the restrictions contained in Section 3. We believe that it is unnecessary and disproportionate to the perceived risks of discrimination that the SME should be restricted in his ability to work on an issue as detailed in 3.2.3. We are of the view that the responsibilities and obligations required under 3.2.1 and 3.2.2 are sufficient to ensure that the SME does not discriminate against other Users in carrying out the duties for which he is employed. We believe that the restrictions contained in 3.2.3 may in fact be detrimental to the development of the Codes insofar as it is may lead to the nomination of less competent SMEs by the nominating parties |
| Transition Document | Part IIC 1.1.1 1.3.1 1.3.4 (c) and (d) 1.3.5 Part 3 1.2 | Incorrect cross-reference, replace J3.10 with J3.11 Replace Metering Separation Date with 12 July 2004 Insert in square brackets 1.2.1 References to TPD 5.1.3 seem to be contradictory Incomplete |
| General Terms Section A – Dispute Resolution (formally Section T) | | |
| General Terms Section B – General (parts of original Section V) | 1.2.3 2.2.1 (b) 2.2.3 (b) 2.4.1 9.1.3 11.1.1 (b) 11.1.6 (b) | Insert A11 in square brackets) missing Insert “the” before System Incorrect cross –reference, replace 1.5.1 with 2.4.1 Use of brackets and stray square brackets? Delete “by the” Clause incomplete |
| General Terms Section C – Interpretation (formally Section W) | 1 2.4.5 | No definition of Incremental Exit Capacity Release Statement has been provided Clarification – is it correct that a transportation constraint can occur on the NTS? |

Associate Documents

| Section | Section Reference | Response |
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| Agency Services Agreement (ASA) | Schedule 8 11.2 | Remove, this function can be preformed by Agency |
| Joint Governance Agreement (JGA) | 2.1.2 3.3 4.1.2 5.3.3 6.2.4 8.1.2 (a) (ii) 10.1.5 11.2.1 (b) 13.1 14.2 2.1.2 (a) Schedule 6 2 (e) Schedule 9 2 (g) Schedule 11 C1 (a) | Insert Transco in square brackets Should read 3.2.2 Include reference to Standard Special Condition A12 Remove square brackets Needs to accommodate appointment of sub-contractors/consultants Needs to reflect DISG requirement for access controlled facilities Insert "knowingly" after "not" Add "sub-contractor" and "Parent Company" Square brackets need revisiting following conclusion of this consultation Square brackets needs further consideration Needs materiality test suggest "£10k" Do not see need to commit to one open meeting per year, as should only be held when deemed necessary Incorrect cross reference, replace 9.1.1 with 9.1.2 Include references to "sub-contractor/consultants" |
| Incremental Exit Capacity Release (IExCR) Statement | | |