

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

**MATRIX 1
UNC Document**

Section	Section Reference	Response
Introduction		
TPD Section A – System Classification		
TDP Section B – System Use and Capacity	3.9.1	To ensure consistency with the proposed interim exit incentives the clause should allow for applications to reduce Offtake Capacity
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	7.4.1 (a)	To provide consistency with the treatment of all NTS connects we propose the removal of the reference to 4.6. This would still provide for the monitoring of OPN performance as currently carried out by Transco in relation to Direct Connects
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	3.5.1 (d)	We suggest that in the event the Site User fails to remove its facilities and the facilities are removed by the Site Owner on the occasion described then the Site User should be required to reimburse the Site Owner for the costs incurred in carrying out the removal activities.
	4.1.4 (c) (i)	We suggest that this clause should be deleted and only to rely on (ii) to provide for that disconnection can only occur in the event that safety is materially and adversely compromised.
OAD Section C – Safety & Emergency		
OAD Section D – Measurements		
OAD Section E – Telemetry etc		
OAD Section F – Determination of CV	2.4	<p>We do not believe that CV Shrinkage liabilities should be borne by DNOs for the following reasons:</p> <ul style="list-style-type: none"> - we have a common interest in minimising CV shrinkage as highlighted in 2.2.1. DNOs are already incentivised via the volume component of the relevant DN price controls to ensure CVs are maintained. - Under 2.2.2, in any event we will endeavour to assist in the minimisation of CV shrinkage - Under our obligations to act as a RPO we will be required to ensure that the equipment operates to the required standards - The Regulations require that we attend to failing apparatus as referred to in 2.1.1 (b)
OAD Section G – Maintenance	2.5.4	We believe that the flexibility maintained by NTS with regards the determination of Flow Relevant Maintenance Days at each offtake is excessive. We do not believe it reflects NTS requirements and could have significant effects on DN operations in the event that the maintenance allowance is targeted at a limited number of NTS/DN offtakes. We propose that the number of permitted Flow Relevant Maintenance Days should be capped at 8 per offtake, with a possibility of exchanging a limited number of days between offtakes, subject to a cap [10 additional days].
	3.3.4	We believe that this clause should be deleted. The ability of each Party to postpone maintenance is equally balanced permitting either Party to request postponement of maintenance in accordance with the provisions of para 3.3. We consider that the reasonable opinion requirement and the co-operative nature of the clause remove the need for cost reimbursements.
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)		
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)	6.5.4	We believe that 2 representatives should be changed to 3 to reflect the balance of the members of the Committee i.e. Transco having 2 members

Incremental Exit Capacity Release (IExCR) Statement		
