

UNC Consultation Response – RWE npower : [Transco]

UNC Document

Section	Section Reference	Response
Introduction		
TPD Section A – System Classification	3.4.1	The use of the term “Total” is not appropriate in that the System is only the NTS System. This should state “out of NTS” or “into LDZ”
TPD Section B – System Use and Capacity	1.2.3.d.i	Quantity needs to be capitalised and add “or part thereof after “Day”
	1.2.3.d.ii	Add “or part thereof after “Day”
	3.8.1 - 3.8.5	This seems to relate to the enduring arrangements not the interim and so should not be included. However, if included it needs to provide for users to be paid for surrendering capacity.
	3.9.1.c	Add “an amount” between “for” and “or”
	3.9.3.b	Replace “shall” with “may”
	3.9.4.a.i	Replace “pursuant” with “following”
	6.1.2	Paragraph 1.2.2. is the wrong reference. Delete “In accordance with paragraph 1.2.2”
	6.2.1	Add “and publish” after “DNO User”
	6.3.3.d	Replace “and” with “and/or”
	6.3.5	What about outside the Application Window. Transco NTS will still need to take account of Shipper user demands which will arise at any time. Published guidelines needed as to who Transco NTS will allocate NTS Offtake Capacity between Shippers and DNO Users in the interim.
	6.3.7	Add “and publish” after “issue”
	6.3.8	Replace “may” with “will
	6.5.5	FT should be defined as “is 0.03 (a 3% flexibility tolerance);” as under I.3.1.3 of the Offtake Arrangemetns the tolerance in respect of offtake at all offtakes is 3% (and in the case of any one NTS/LDZ Offtake 10%). To set a tolerance in the overrun formula (which is not even being used as yet) will penalise DNO users for doing something they are legitimately entitled to do under the Offtake Agreement. The same argument will apply for Shipper Users (if this overrun formula is ever applied to them) as the NexA provides for a tolerance of 3%.
	6.5.6	Bearing the current wording of this clause 6.5.4, 6.5.5. and 6.5.6 should be deleted in their entirety.
TPD Section C - Nominations	1.7.3,1.7.4 and 1.7.5	In each case reference to paragraphs 1.6. should read 1.7
TPD Section E – Daily Quantities...	3.4.1,3.4.2 and 3.4.3	Why has this text been deleted and does it appear elsewhere
TPD Section F – Balancing Charges etc	1.4.3	Why has this text been deleted and does it appear elsewhere

TPD Section G – Supply Points	1.1.1.b	Replace “User” with “Shipper User”
TPD Section G – Supply Points	1.9.12	We should have sight of Supply Point Information Service Guidelines and ensure it is reviewed in the light of DN Sales and Agency Arrangements
TPD Section G – Supply Points	1.8	Sub deduct arrangements: There are references to both System and Total System Is this appropriate?
TPD Section H – Demand Estimation..	1.6.5.b.i	Should have sight of document specifying NDM Sampling information, needs to be available to Shippers.
TPD Section H – Demand Estimation	1.4.2	Missing Word: Uniform before Network Code Committee Reference: Section B General Terms 10
	1.6.6	Shouldn't it be more precise as to how often the consultation should take place (e.g. every 5 years)?
	1.8.1	Missing Word: Uniform before Network Code Committee
	1.8.6	Missing Word: Uniform before Network Code Committee
TPD Section J – Exit Requirements	1.3.1	Need definition of downstream transporter as used in 3.5.7.d and 7.1
	1.5.4.c	Should this read Network Exit Provisions
	2.1.1.a.ii.	Should this also include CSEP Exit points
	3.4.1.c	Remove “of” after liability in the last line
	3.4.3	Why has the exclusion in brackets been included? If the Offtaking User is a Shipper User why should amounts under 3.4.c.ii, which are payable to DNO Users excluded.
	3.5.7.c	It needs to be defined which Transporter, either the upstream or downstream, pays these amounts. Shippers should not have to be party to the debate as to who is to blame.
	3.5.8.b	GS/OS payments be excluded from payments to Shippers. Delete this clause in its entirety
	3.6.2	The paragraph starting “Where in relation to any Day” should be para 3.6.3
	3.7.4.a	Change “User” to “Shipper User”
	3.7.4.b	Delete the words “by that User”
	3.10.3-6	These should not be sub clauses but should be part of 2.10.2.
	3.10.9	Replace User in the second line with “DNO User”
	3.10.9.a.iii	Referred clause should be B.6.5 not B.6.4
	3.11	Replace reference to PGT in the title as these no longer exist
	4.1.1	Replace “further to” with “in addition to”
	4.1.2.	We are concerned that this clause will impose the offtake obligations contained within the code on Shipper Users who do not have NEXAs. Also there is no paragraph 4.8 (check paragraph cross references)
	4.1.3	There is no paragraph 4.8 (check paragraph cross references). Also “and” in the second line should read “or”

	4.5.5	Paragraph 7.3.2 applies to DNOs at Inter System Offtakes but OPNs can be made by Shipper Users too.
	4.5.6.a	Add “and/or;” at the end
	4.5.6.c	This is not a sub paragraph but part of 4.5.6.
	4.5.9	Para ref 4.6 should read 4.5 but is “Permitted Offtake Rate” Used in 4.5
	4.5.9.c	3.10.3 should be what is currently shown as 3.10.7
	6.4.3	Is “gas Transporter” the correct term for any party with a GT licence which this is trying to say?
	6.4.3.a	Is “Transporter” in the first line correct or should this mean “gas Transporter”
	7.1	What happens if both the upstream and downstream Transporters claim they have complied bu the Shipper User still cannot get gas
	7.3.2	Need sight of the the allocation principles referred to
	7.4.1.a	Missing and “and;” at the end
	7.4.1d	“othe” should be replaced with “other” and ad and “or” between “person” and “consumer”
	7.4.2	Operator spelt incorrectly and paragraph 7.3.1 should read 7.4.1
TPD Section K – Operating Margins	1.2 and 1.3	These clauses should be combined in a single clause entitled “Transco NTS as a User” with each each type of User included. There is no definition of a NTS User as seems to be implied by the title of Clause 3.
	3.3.4	Why has this been deleted
TPD Section L – Maintenance etc...	1.2.4	Why has this been deleted
	2.1.3	Add “Uniform” between “the” and “Network”
	2.2.1	Why should Users pass information to Transco NTS and the relevant Transporter. Surely Transco NTS can pass this information on as the information they provide to Transco NTS under 2.1 is to Transco NTS. Otherwise Users will have to disaggregate information provided under 2.2.1 by relevant Transcporter.
	2.3	This should state that this information should be provided to Transco NTS as they are the party to whom the information is provided under 2.1
	3.2.c	Why have the last two lines been deleted
	3.5.3	Why has this been deleted
TPD Section M – Supply Point Metering	1.5.3	Need to ensure that these document are updated to reflect DN Sales
TPD Section M – Supply Point Metering	2.1.6	Should have sight of T/PR/GT2 and why has “case by case basis been removed”
TPD Section M – Supply Point Metering	2.3	Should have sight of T/PR/GT3 (as referred to in 2.4.2.c)
TPD Section N – Shrinkage	1.2	Does the Transco NTS vent gas and if so why is only the DN Operator referenced
TPD Section N – Shrinkage	1.6	Why has this been deleted

TPD Section N – Shrinkage	4.4	This clause covers Shirkage Output nominations but there is no provision for Shrinkage Input Nominations. Is this required ?
TPD Section N – Shrinkage	4.5	Is it appropriate that User should include DNO User, as per 1.5
TPD Section O – System Planning	3.2.1 and 3.3.3	Why should Users provide this to the Transporter and not Tansco NTS or the Transporters. This will require Users to disaggregate data submission.. The implication of 3.3.3 is that only Transco NTS require the Base Plan data and if they do not the all other Transporters should be required to not identify the name of any particular User with regard to this data.
TPD Section O – System Planning	4.1.	Replace “the Transporter will” with “Transporters will” in 4.1.b as the 10 year statement is intended to be a collectively compiled document. Also replace “year “ and delete “publish” as 1.2.1.says that Transco NTS will publish this.
TPD Section Q – Emergencies	1.6.a	Compiling and updating the list of Priority consumers should be an Agency role and therefore “Transporter” should be replaced with “Transporters” in the second line of 1.6.a. This should also be added to the list in V.6.5.2
TPD Section Q – Emergencies	1.6.b	Replace “Transporter” with “Transporters” otherwise Shipper Users will face the prospect of different priority creiteria applying to different networks which will increase fragmentation.
	3.1	Is drafting needed to cover an eventuality where two separate Transporters are both experiencing an emergency on their network and require the Shipper User to take actions which conflict with each other.
TPD Section S – Invoicing & Payment	2.4.7	Should have sight of Operational Rules Governing the Supply of Invoice Charges via the Ad Hoc Process Needs to be updated to account for DN Sales and made visible to Shippers
TPD Section S – Invoicing & Payment	4.1.8	Should have sight of Invoice Query Methodology Needs to be updated to account for DN Sales and made visible to Shippers
TPD Section S – Invoicing & Payment	4.1.10	Should have sight of Invoice Query Estimation Methodology Needs to be updated to account for DN Sales and made visible to Shippers
TPD Section S – Invoicing & Payment	4.7.1	Should have sight of Standards of Service Query Management Operational Guidelines Needs to be updated to account for DN Sales and made visible to Shippers
TPD Section U – UK Link	1.8.1	Should be ‘Each Transporter’ not ‘The Transporter’
	1.8.3	Should be ‘a Transporter’ not ‘The Transporter’
	1.10.2	There is no Section B 1.5.1 (current reference) nor V 1.5.1 (previous reference) – this section ‘shall not apply’
	2.2.2	‘Transporter’ should be ‘Transporters’
	5.3.3	There is no Section B 1.5.1 (the current reference) nor V 1.5.1 (the previous reference)
	7.6.1 e	Assume that ‘the Transporter becomes aware’ is same as ‘the Transporter’s Agency becomes aware’ – same issue as for 1 above ‘Transporters’ collective obligation through Agency
TPD Section V – General	1.4. and 1.5	Not Used has been deleted elsewhere and should be done so here too
TPD Section V – General	1.3 and 1.3.1	Missing Uniform from in front of Network Code
	2.1.2 b	References to ‘DNO’s Code’ and ‘Transco NTS’ code’ - this should be a reference to just ‘Code’ as referenced in B1.2.3
	3 Generally	Missing Uniform from in front of Code Credit Limits
	4.2.2 d & g	“Under Transco NTS’s Code, the User has ceased to be bound each other Transporter’s Code.” – do not understand what this means – also same issue re reference to specific Transco NTS code as highlighted in 2.1.2 b Definition of NTS Code?

	5.5.3.i	This should be deleted but if not the same condition should apply to Shipper Users in 5.2
	5.8	This clause needs to be more precise as data can relate to more than one System and as it stands there could be considerable uncertainty as to who owns data in future.
	5.9	The title of this clause is no longer appropriate following the deletion of what was Annexe V-1 from this clause and should be changed to "Supplementary Data". Also 5.9.2 can now be deleted as new Annex V-1 specifies the timing of data disclosure.
	6.5.2 f 5	Suggests that the "Transporter Agency Activities" include 'those activities necessary for the illegal taking of gas'. Appears to be a problem with format: Looks as if sections b – f should be sub-sections of a (viii)
	V 6.5.2 (1 st occurrence)	The following services, as required under the GT licence, should be included in this section: Recording and calculation of transporter performance and payments due in relation to Standards of Service Compiling a Priority Consumer list as per Q.1.6 Bureau Services C&D Obligations SLC 17 SRVs and USRVs
	V 6.5.2 (1 st occurrence)	There is an obligation in the ASA which should be covered in this section: The calculation and recording of transportation volumes and quantities
	V6.5.2 (1 st occurrence)	This section must include an obligation to provide both Operational & Invoicing query service in accordance with Section S
	V.6.5.2	Should include the management and provision of secretarial services to cover Billing Ops forum, RbD Auditor sub committee, Provision of data to facilitate portfolio reconciliation as currently supplied .
	V 6.5.2 (1 st occurrence)	General – responsibilities of Agency- provision of DM reading? Refer to Action Log No 259
	V 6.5.2 (2 nd occurrence)	Delete "Where the agreement between the Transporter for the purpose of this paragraph 6.5 so provides" as user shippers will not necessarily know this. To take account of this replace "will" in second line with "may".
	8.2.5	Format issues which confuses paragraph – section attempts to define liability when Shippers deal with Transporter's Agency so that only 'relevant Transporter' may be liable – is this easily identifiable? What if Transporter's Agency is liable – are all Transporters equally liable? Also Shipper users should not be required to waive rights or remedies against any other Transporter or release each other Transporter from any duties or liabilities as stated in 8.5.2.b if they is a dispute as to who the relevant Transporter is.
	12.2.1 12.4.5 14.2 14.4 to 14.10	Missing Uniform in front Network towards end of sentence replace "to increase" with "to change". Delete (d) as not used Remove foot note Delete as not used
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)	1.1 (f)	Should this include 3 rd party participant as implied in c & e
	2.1	'Voting Member' – 'and' on very end of sentence makes it sound like something is missing – is this right?
	3.2.1	No mention of Deputy and no mention how Deputy is appointed
	3.2.1	Wording needs to clarify as per Joint Office Agreement that each Transporter will have a representative
	6.2.1 (f)	Check Condition A11 par 15(b) – we question whether this is the correct reference
	6.2.2	Reference to Annex V1? Should this reference 'Code' Annex V1?
	9.1.4 (b) (i) & (ii)	References SME Code of Conduct and Terms of Appointment – Can these registers be written in Consultation with Shippers.
	9.5.2 b (ii)	Recommendations to Authority This needs to be clarified so that the description states “Where no panel majority exists recommendation to the Authority will be not to change
	9.6.1 (o)	Reference to Code Standard of Service – this document should be available for review
	10.1.2 c & 10.2.2	This requires clarification – it is our understanding that the SME submits a report to the Joint Office not direct to the Authority
	12,1,1	What is GT Section B? This should be more specific
	12.4	Transporters allowed to vary our mod proposals? We challenge why Transporters should have this right.
	12.8.1	Again talks about Transporters finalising reports? Should include: “[relevant SME] to help finalise report”
Transition Document	Part IIC 1.2,1 onwards	Need to read in conjunction with Section G of NWC
	Part iiC 1.3.1	Reference is incorrect, M2.7 doesn't exist
	Part 1.3.1 (a)	Reference is incorrect , M2.2.2 doesn't exist
	Part IIC 1.3.1 onwards	Need to read in conjunction with Section M2.7, M3.8.1, M2, Section M
	Part IV 2.2	Reference Standard Special Condition A11 (13) (b)
	Part IV - 5.	Where is Review Proposal defined? It should be made clear that this should be done in conjunction with Users

General Terms Section A – Dispute Resolution (formally Section T)	1.1.2 b	Question: What is a “Supplemental Agreement”?
General Terms Section B – General (parts of original Section V)	1.2.3	Transco has a single code network code to cover its capacity as both NTS and DNO – this seems inconsistent with references elsewhere in the Code to “Transco’s NTS Code”
	2.1.3	First use of ‘of’ on last line is incorrect – should be “or”
	11.1.6 b	There are no “Oftake Communications’ following on form this clause
General Terms Section C – Interpretation (formally Section W)	1	‘Date of Code’ – no date given ‘Distribution network’ no Special Condition reference defined ‘Standard Condition’ – definition missing