

UNC Consultation Response – Respondent Name: Scottish and Southern Energy

UNC Document: OAD, Policy Comments

OAD Section A – Scope & Classification		No comment.
OAD Section B – Connection Facilities	3.1.5	We are not clear that it is necessary for the Site Owner to require the consent of the Site Users before selling or disposing of any part of the Offtake Site on which Co-located Connection Facilities are located. Concerns should be addressed under the lease rights.
	3.5.1©	The Party should only be required to bear / reimburse costs reasonably incurred.
	3.5.1(d)	This should be amended such that the Site Owner can recharge the Site User for costs incurred in removing Co-located Connection Facilities where the Site User fails to remove them.
	3.6	A clause should be inserted stating the Party gaining access will be responsible for reinstatement.
	4.1.4©	Drafting doesn't quite reflect Business Rules. Disconnection should only be used as a last resort and only for safety reasons. This needs to be clearer. The words "in any event" at the beginning of the paragraph should be deleted.
	Annex B-2	We note the reference to Gas Services. We need to ensure this doesn't conflict with gas supply licence requirements.
OAD Section C – Safety & Emergency		No comment.
OAD Section D – Measurements		No comment.
OAD Section E – Telemetry etc		No comment.
OAD Section F – Determination of CV	2.4	We do not believe this clause is necessary. Transporters have sufficient incentives and obligations to ensure they maintain equipment and minimise CV Shrinkage. Given that there will be no change in equipment , management or reporting practices as a result of the sale there should be no impact on CV Shrinkage. Furthermore, given daily reporting requirements, there should be sufficient transparency such that should any problem or deterioration occur in future, it should be visible and appropriate action could be taken at that point.
	4.1.5	The OAD recognised that initially Transco will be required to undertake the determination of daily CVs on the DNO's behalf. However Transco NTS is not held liable for delivering this data, even when negligent. We suggest this wording should be modified. The Business Rules provided for Transco NTS to publish daily CVs on the Transco web site. There is no mention of this in the OAD. This should be provided for under this Section F.

OAD Section G – Maintenance	2.2.4	This states that the planning Party shall not be obliged to modify its draft Maintenance Programme to reflect the comments or requests of the affected Party. This is not appropriate. This should refer to the final and updated Maintenance Programmes and should provide for DN maintenance or comments to be taken into account and reflected where possible.
	2.3.2	This states that nothing in the document requires Transco NTS to take account of any DNO's proposals or reflect such DNO's Maintenance Programmes. This section needs to be modified as above to ensure a more balanced approach is adopted and as far as possible Parties co-operate and co-ordinate maintenance programmes to ensure minimum disruption to customers.
	2.5.4	This needs to make it clear that there is a maximum number of days per offtake. We believe 18 should be sufficient.
	Annex G-2	This needs to reflect the fact that Transco NTS will have entered in to discussion with all Parties and Users before the first draft is issued, and as far as possible requirements will have been incorporated in the first draft. This should make it easier for the DNO to turnaround its draft within the 1 month provided.
OAD Section H – Long Term Planning		No comment..
OAD Section I – Operational Flows	2.5	This sets out that where LDZ demand for any day is forecast to be less than 60% of 1 in 20 peak day demand, Transco NTS may give not ice to the DNO requiring it to operate the LDZ flat. We believe a figure of 50% may be more consistent. This should be in accordance with current planning and operating arrangements. It should also be clear that this is based on the day ahead forecast.
	4.3.4	We believe this is unnecessarily prescriptive. As an alternative to the fixed linear within day pressure profile this should provide for Transco NTS and the DNO to agree an alternative profile in accordance with current planning and operation arrangements. We believe this should provide for greater efficiency on both networks.
OAD Section J – LDZ/LDZ Offtakes		No comment.
OAD Section K – LDZ System Entry Points		No comment.
OAD Section L – Cost Recovery.		No comment.
OAD Section M – Information Flows		No comment.
OAD Section N – General	1	There are several paragraphs which set out duties which fall to the Offtake Committee. We believe it may be more appropriate that some of these be discharged through the Joint Office. This may need further consideration.