

	UNC Response File (TPD)							
						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SSE001	UNC-TPD	A	1.2.2(b)(ii)		Transporters should be Transporter's	Accepted	Drafting amended accordingly.
	UU001	UNC-TPD	A	1.2.2(b)(iii)		We do not understand why this paragraph is relevant to the designation of an LDZ. Please delete.	Code needs a definition of LDZ for a number of reasons. Process of defining now includes all transporters. It is not defined in the code to set out the operation bounds of a DNO.	No change.
	SSE002	UNC-TPD	A	3.3.2		Reference should be to J.6.1	Accepted	Drafting amended accordingly.
	NPow032	UNC-TPD	A	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"	The drafting is appropriate and reflects that in respect of an NTS Exit Point gas can flow out of the NTS where it either exits the Total System (i.e. at the NTS direct connects) or where it flows into an LDZ. We will add new clause 3.5.3 to clarify.	Drafting augmented accordingly.
	SSE003	UNC-TPD	A	3.5.1		Could Transco confirm that for RbD purposes gas will be allocated between LDZs?	RbD will continue to be processed at an LDZ level, as now	No change.
	UU002	UNC-TPD	A	3.5.5		This does not make sense in the context of an Inter System Offtake comprising only one Individual System Point as described at A3.5.1. Paragraph 3.5.5 should therefore be deleted.	We have amended 3.5 to remove the doubt.	Drafting amended accordingly.
	SGD003	UNC-TPD	A			We note that the independent gas transporters (iGTS) are not included in the definition of the System. Although not necessary for the sale, we consider that an opportunity has been missed to bring the iGTS into a common system, eg for transfers. .	The inclusion of iPGTs was never included in the scope and including them in the UNC was not an objective of network sales.	No change
	SSE009	UNC-TPD	B	2.3		Change heading "System" should read "NTS"	Accepted	Drafting amended accordingly.
	EON002	UNC-TPD	B	3.8		Whilst we do not necessarily disagree with the concept, we do not understand why surrender of NTS Exit capacity is included in the interim arrangements. It does not seem to be necessary to facilitate the immediate sale of the DNs.	The Ofgem FIA concluded that the interim arrangements should feature an "unconstrained release" of capacity in the interim period pending implementation of the enduring arrangements. Without the capacity surrender mechanism access to incremental NTS exit capacity would be unchanged from the current arrangements, which are generally accepted to constitute a "constrained release" of capacity given the inevitable limitations that might be imposed by the physical system and the inability to invest to create additional capability in the interim period.	No change.

							Business Owner	
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	EON003	UNC-TPD	B	3.8		On the basis that we do not consider that 3.8 is necessary for the interim arrangements, this section would become superfluous as provisions already exist for increasing capacity and redesignating interruptible sites as firm, which are not linked to the surrender of NTS Exit Capacity.	The provisions to redesignate as firm do exist. However B 3.8 is designed to increase the likelihood of being able to satisfy such requests during the interim period.	No change.
	STA002	UNC-TPD	B	3.8		The section states that Transco will publish a methodology on how they will undertake the buying back of capacity. This is very different to section 2.10 ((surrender of Entry Capacity) where Transco has offers in which to buyback capacity in a transparent market process and Shippers can put offers onto the system on days when they are available to sell capacity back. Although much of this appears to be resolved in the enduring exit regime STUK are of the opinion that additional information about buy backs etc prior to the commencement of the enduring regime would inform the development process. Under section 2.10 in the current Network Code Transco then publish information about how much capacity they have bought back and the average prices they have paid. STUK believes that there needs to be parity between the two systems. It is inappropriate to leave it up to a document outside of UNC governance to control.	<p>Section B 2.10 of the current Network Code currently relates to the short term capacity surrender mechanism that is fully systematised (usually referred to as the "RGTA capacity buy-back system") and which is designed to be used for the management of capacity "in the prompt". It is not possible to have such a system operable, at least in the early period of the interim regime, nor is it necessarily essential. The proposed B 3.8 is designed to address the facilitation of incremental release of system capability on the "unconstrained basis" as required by Ofgem during this period. B 3.8 is therefore designed to facilitate the reduction of capacity at one location so that incremental release at other locations (either associated with Direct Connects or DNs) that could not otherwise be satisfied because of physical constraints on the system.</p> <p>The methodology statement will define the basis under which NTS would accept offers to surrender capacity where there are multiple sellers who might be able to satisfy the requirement.</p> <p>B 3.8 is designed to enable such processes</p>	No change.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	EDF002	UNC-TPD	B	6		We are generally happy with this section apart from the introduction of the flow flexibility charge methodology for the DNO's. We do not believe this level of reform of section B is warranted at this point, despite the charge being set to zero as it may restrict or even conflict with the introduction of enduring arrangements the GTs need to implement before September 2005. We recognise that Transco needs to distinguish between capacity and flexibility but this could be through less onerous or prescriptive legal text. Recognition of the fact that DNs need to maintain a 1/24th rate should be sufficient for now and detailed legal text should only be introduced when the enduring regime has been established together with any Shipper required obligations. Introducing this level of reform now is neither efficient or economic and we would urge Transco to review or remove section 6 altogether until it is further understood and agreed what the flow flex product will look like.	<p>We welcome recognition that Transco needs to distinguish between flat and flexibility capacity. It is essential that the interim regime reflects this from Day 1. These arrangements do not conflict with the requirement to implement enduring arrangements before September 2005.</p> <p>DNs will be unable to manage their gas flows at 1/24th rates. The interim arrangements provide product definitions and facilities to accommodate deviations and excursions where it is operational feasible and consistent with economic and efficient operation of the system.</p> <p>The new products are only to be introduced in respect of NTS/DN offtakes and therefore constitute an appropriate and proportionate evolution of the current regime to facilitate DN sales. Direct Connects will continue to effectively have unconstrained access to flexibility capacity within their MHQ, notice period and rate change restrictions. The wider implementation of the products will be considered as part of the NTS Exit Reform UNC Modification Proposal that Transco will seek to raise after the initial UNC has been implemented.</p>	No change.
	SSE010	UNC-TPD	B	6.2		<p>In the draft Scottish Offtake Capacity Statement there would appear to be an inconsistency in the interaction between energy values (assumed CV) and the calculation of the NTS Offtake capacity volumes. We believe that the energy for 2005/06 has been incorrectly stated and that the calculations should be amended. The 2200 hours pressure at Glenmavis from 2008/09 is shown as 45 bar. However we understand that NTS has agreed in writing with the Scottish DN that the pressure would be 49 bar.</p> <p>There are some discrepancies with the flexibility capacities and pressures for the Southern DN compared with the ORA. Please could Transco double-check the numbers?</p>	<p>We will establish the correct OCS data and then it would be our intent to publish prior to UNC implementation.</p>	No change.

							Business Owner	
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SSE011	UNC-TPD	B	6.3		This describes the process by which the DN may apply for increases to its NTS Offtake Flat or Flexibility Capacity or the Assured Offtake Pressure. We note that other NTS Exit Points may apply for increases to NTS Exit Capacity at anytime.	Section B 6.3 provides for a DNO User to apply to increase NTS Offtake (Flat) Capacity and NTS Offtake (Flexibility) Capacity. Section J provides for a DNO User to apply to increase the Assured Pressures for relevant Gas Years. The times at which such applications can be made are specified in Section B 6.3.2. Users, in respect of NTS Supply Points and NTS Connected System Exit Points may apply to increase NTS Exit Capacity at any time. We do not intend to change the drafting in this respect.	No change.
	SSE012	UNC-TPD	B	6.3		During the existing annual planning process NTS provides forecast demand and CV data to the DNs and then the DN analyses this data before submitting offtake requirements to NTS. How will NTS provide timely CV data to the DN in advance of the Application Window?	Section H of the UNC Operator Arrangements Document provides for the bi-directional exchange of information between the NTS and DNs. NTS would expect to engage in dialogue with the DNs about anticipated CVs. The timetable for information exchange indicates that Transco NTS will provide its latest view of projected CVs during the application window envisaged in Section B6.	No change.
	SSE013	UNC-TPD	B	6.3		We note that the legal drafting now seems only to provide for the DN to request ad-hoc/exceptional amendments to the Offtake Capacity Statement within the Gas Year. The legal drafting appears to restrict the DN so that it is only able to make requests during the "Application Window" in respect of any future Gas Year. E.g. if the DN wanted to apply to increase flat capacity at an offtake for the Gas Year 2006/07 it would need to wait until the Application Window in Gas Year Y-1 i.e. not until 1 June-31 July 2006. This doesn't seem to be in either Transco NTS or the DN's interests.	The drafting has been deliberately structured to provide the ad-hoc facility for capacity increase requests during, or very shortly before the start of, the relevant year. This provision was designed to assist DNs who might otherwise find it difficult to satisfy their statutory and Licence obligations whilst at the same time ensuring that the normal annual application process was not undermined by ad-hoc requests for capacity right through the interim period. Such use of the ad-hoc process might be considered to create a "first come, first served allocation process" which many might consider to be discriminatory. The annual application process, when requests from all DNs might be considered concurrently affords greater opportunity to avoid risks of allegations of undue discrimination. We therefore do not propose to change the drafting.	No change.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SSE014	UNC-TPD	B	6.3		We believe that it would be more efficient if this process also provided for requests for downward revisions of Offtake Capacity Statement figures.	We note the comment and agree that the drafting needs to be revised to reflect the opportunity to reduce NTS offtake capacities.	New 6.3.7 inserted and 6.3.8 amended.
	SGD004	UNC-TPD	B	1.1.2		We consider that the term “DNO User” to be inappropriate. While the intent appears to be to ensure that there is no confusion with Shipper Users, we consider that another term specific to transporters, avoiding the word “User” would be less likely to create confusion	By the introduction of a commercial relationship between NTS and DNOs it is necessary to catagorise them as Users under the Code. To differentiate between shipper users, a subset of User ahs been created, "DNO User" to establish which parts of the UNC are applicable to which type of User.	No change.
	SSE004	UNC-TPD	B	1.2.3(c)		spelling of “utilizing” inconsistent with elsewhere	Accepted	Drafting amended accordingly.
	NPow033	UNC-TPD	B	1.2.3(d)(i)		Quantity needs to be capitalised and add "or part thereof after "Day"	Capitalisation: accepted. "or part thereof": the drafting identifies utilisation in the context of the rate of offtake not being equal over the Day. Therefore there is no need to add "or part thereof"	Capitalisation made. No other change.
	SSE005	UNC-TPD	B	1.2.3(d)(i)		line three capitalise “quantity” We note the provision “releasing from utilisation” – Section B.6. will need to be amended to accommodate this. (See later comment).	Accepted re capitalisation. Other comment rejected.	Capitalisation made. No other change.
	NPow034	UNC-TPD	B	1.2.3(d)(ii)		Add "or part thereof after "Day"	The drafting identifies utilisation in the context of the rate of offtake not being equal over the Day. Therefore there is no need to add "or part thereof".	No change
	SSE006	UNC-TPD	B	1.2.5		replace “in” line 1 with “as	Accepted	Drafting amended accordingly.
	STA001	UNC-TPD	B	1.2.5		Categorisation on LDZ/LDZ offtake. How do Transco as system operator register a stock change between two systems in this manner?	The OAD provides that the downstream LDZ will provide the upstream LDZ with quantities offtaken on a daily basis. This data is used within the commercial systems to ensure that the correct quantities are attributed to the appropriate LDZ thereby assuring that stock changes, shrinkage and NDM attributions are derived consistently.	No change.
	UU003	UNC-TPD	B	1.2.5		in" should read "as"	Accepted	Drafting amended accordingly.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SGD005	UNC-TPD	B	1.2.9		1.2.3 (f) defines supply point capacity as a point where a User (shipper) is offtaking gas from any part of the Total System. 1.2.9 (a) states that Shipper Users can not hold NTS exit capacity. We would expect that for the interim period we would continue to hold exit capacity in the normal manner for any NTS customers to whom we supply gas and that we would be invoiced for capacity charges accordingly. We would welcome clarification.	1.2.9 (a) states that NTS Exit Capacity does not represent capacity in the NTS. However in relation to NTS/LDZ Offtakes, in the interim arrangements, NTS Exit Capacity will continue to be allocated to Shipper Users as now (based upon the aggregation of relevant supply point capacities). This will enable the current billing arrangements in respect of such capacity allocations to continue in the interim without any further amendments (other than those to reflect new ownership of DNs) to shipper systems. Thus shippers to supply points in the LDZs will continue to see NTS Exit Capacity charge invoices in the same form as currently. Similarly there will be no changes in respect of NTS Exit Capacity invoicing arrangements at NTS direct connects.	No change.
	SSE007	UNC-TPD	B	1.2.9(c)		line 2 insert “)” after 3”.5”	Accepted	Drafting amended accordingly.
	UU004	UNC-TPD	B	1.7.10		The licence reference is not correct.	Accepted	Drafting amended accordingly.
	UU005	UNC-TPD	B	1.8.3		The paragraph reference of the licence condition referred to is not correct.	We do not agree with this comment.	No change.
	SSE008	UNC-TPD	B	2.1.7(a) and 2.1.8		This clause refers to Transco NTS determining System Entry Capability. At an embedded entry point the DN will be determining this in accordance with OAD Section K.3.1.3 and passing the information on to Transco NTS. Would it therefore be more appropriate for the TPD reference to be to the Transporter, rather than Transco NTS	Accepted	Drafting amended accordingly.
	UU006	UNC-TPD	B	2.11.1		"New Aggregate NTS System Entry Point" - delete "NTS"	Accepted	Drafting amended accordingly.
	UU007	UNC-TPD	B	3.1.3		We still do not understand where this paragraph would apply. It surely would not apply for example to paragraph 3.8?	We believe the drafting to be appropriate.	No change.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SGD006	UNC-TPD	B	3.8 & 3.9		We are not clear about the purpose of this paragraph as it appears to presume the implementation of the enduring exit arrangements. Or is it expected that a shipper with a firm customers in the interim arrangements would develop contractual arrangements to offer that capacity back (a very different proposal to offering commodity back; eg demand management). These changes appear to presume acceptance by Ofgem of other changes currently out for consultation and/or not yet consulted upon.	<p>The provisions of B 3.8 and 3.9 are designed to satisfy the requirements for an “unconstrained release” of NTS exit capacity as specified in Ofgem’s FIA. It is not to presume implementation of enduring exit reform but to allow for the interim arrangements. The intent of this drafting is to increase the likelihood of being able to satisfy requests for new or incremental NTS exit capacity in the interim period, rather than have such applications limited via the physical capability of the network in the context of current connected loads and their expected offtakes from the system.</p> <p>It is a matter for individual shippers, should NTS have a requirement to seek such capacity surrender, to decide whether they would wish to participate in the process envisaged by B 3.8.</p>	No change.
	NPow035	UNC-TPD	B	3.8.1 to 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.	These provisions have been drafted to satisfy the requirement for an “unconstrained release” of NTS exit capacity and NTS offtake capacity in the interim arrangements. The provisions within B 3.8 provide the basis for the treatment of the capacity quantities associated with each capacity surrender. The treatment of such cashflows is to be addressed in the NTS allowed revenue Licence conditions.	No change.
	MGN001	UNC-TPD	B	3.9.1		To ensure consistency with the proposed interim exit incentives the clause should allow for applications to reduce Offtake	Accepted	Drafting amended accordingly. See B6.3.7
	NPow036	UNC-TPD	B	3.9.1(c)		Add “an amount” between “for” and “or”	Accepted	Drafting amended accordingly.
	NPow037	UNC-TPD	B	3.9.3(b)		Replace “shall” with “may”	Transco believe that the should be obliged to respond in these circumstances	No change.
	NPow038	UNC-TPD	B	3.9.4(a)(i)		Replace “pursuant” with “following”	Transco believe that the text is sufficiently clear	No change.
	UU008	UNC-TPD	B	3.9.4(a)(i)		To make clear that NTS Offtake Capacity would not be reduced following acceptance of a surrender of NTS Exit Capacity please insert after “other than” the words “except in the case of NTS Offtake Capacity”	Covered by exclusion in 3.8.1 therefore believe no amendment required.	No change.
	UU009	UNC-TPD	B	4.6.9		Is “ci” correct. The reference to paragraph (f) should be to (d).	Accepted.	To be reflected in final drafting.
	NPow039	UNC-TPD	B	6.1.2		Paragraph 1.2.2. is the wrong reference. Delete “In accordance with paragraph 1.2.2”	Accepted: reference should have been to B1.1.12	Drafting amended accordingly.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
NPow040	UNC-TPD	B	6.2.1		Add "and publish" after "DNO User"	We note the divided opinion from respondents upon this matter. We have chosen to publish the anticipated OCS data, which is currently on the website, and it would be our intention to publish OCS data to achieve transparency during the interim period. We do not propose to change the drafting at this stage.	No change.
UU507	UNC-TPD	B	6.2.1		Linked to the provisions of this section we do not believe the Offtake Capacity Statement should be widely published, and should be issued on a confidential basis to the relevant party. In any event, we would request that the 22.00 Assured Offtake Pressure be checked for accuracy with respect to the figures issued on this occasion.	We note the concerns about confidentiality but believe that it is appropriate to publish the OCS. We will ensure that we check the provisional OCS published data before we finalise the OCS statements for UNC purposes to aid transparency in the allocation of capacity and pressure.	No change.
UU505	UNC-TPD	B	6.3.2		This clause anticipates a DNO User applying for an increase in the amount of its NTS Offtake Capacity statement at NTS/LDZ offtakes. This paragraph should be extended to reflect a DNO having the right to apply for a decrease.	Accepted.	Drafting amended accordingly.
NPow041	UNC-TPD	B	6.3.3(d)		Replace "and" with "and/or"	Accepted.	Drafting amended accordingly.
NPow042	UNC-TPD	B	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.	B6.3.2b provides for applications to be considered outside the bid window and which will be considered in the order that they are received.	No change.
NPow043	UNC-TPD	B	6.3.7		Add "and publish" after "issue"	NTS Transco would envisage that it would publish revisions to the OCS following adjustments to capacity during the interim but does but does not propose to amend the drafting.	No change.
NPow044	UNC-TPD	B	6.3.8		Replace "may" with "will"	NTS Transco would envisage that it would publish the amount of NTS Offtake Capacity held at NTS/LDZ offtakes but does but does not propose to amend the drafting.	No change.
SSE015	UNC-TPD	B	6.3.8		Whilst in principle we agree with publication of information, careful consideration should be given to the implications from a security point of view.	We note the issue raised but do not believe that the release of this capacity information per se creates any security issue.	No change.



						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	NPow045	UNC-TPD	B	6.5.5		FT should be defined as "is 0.03 (a 3% flexibility tolerance);" as under I.3.1.3 of the Offtake Arrangemets 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%.	The 1.5% "flexibility tolerance" defined in B 6.5.5 is applied to a cumulative integrated offtake over 16 hours. This is quite different to the instantaneous rate tolerances applied in respect of OPNs. We believe that a tolerance is appropriate and preferable to not having a tolerance in which circumstance a user fully utilising flexibility would be subject to overruns associated with random events. We believe that 1.5% provides an appropriate tolerance in respect of the utilisation of flexibility capacity test.	No change.
	NPow046	UNC-TPD	B	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.	It is the overrun provision, and that alone, that defines the flexibility capacity product. The product would be meaningless without B 6.5.4 and B 6.5.5. B 6.5.6 provides clarity that a User is not exposed financially when an overrun occurs.	No change.
	CE001	UNC-TPD	B	general comment		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.	We do not believe this to be the case with the interim arrangements, which are well defined. It would be helpful if any specific concerns are raised as a matter of urgency.	No change.
	EON001	UNC-TPD	B	general comment		A number of clauses appear to pre-judge the form of any enduring exit arrangements and associated incentives as well the nature of involvement of Transco in an exit capacity 'market'. We wish to see Transco's role as NTS operator in energy or capacity markets to be as residual as possible thereby minimising the extent to which Transco can inadvertently distort such markets.	The drafting reflects the definition of the interim regime as defined in the TANIF consultation having due regard for Ofgem's FIA and the Authority decision. The proposals include arrangements to satisfy Ofgem's "unconstrained capacity" release requirements but these are still well short of defining an "exit capacity market".	No change.
	SSE021	UNC-TPD	C	1.12		renumber 1.12 as 1.11	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.
	SSE022	UNC-TPD	C	1.13		renumber 1.13 as 1.12.	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.
	SSE016	UNC-TPD	C	1.1.7		We note this provision for Transco to notify each other transporter of the nominations made by shippers on its system. However we do not believe that this is referenced in the OAD. The corresponding obligation should therefore be included in the OAD.	Comment accepted.	Provision removed from TPD and drafted into OAD Section I 6.2.
	SSE020	UNC-TPD	C	1.10.2		Reference should be to 1.10.1	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.
	SSE017	UNC-TPD	C	1.7.3		reference should be to 1.7.1(a).	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.
	NPow047	UNC-TPD	C	1.7.3 and 1.7.4 and 1.7.5		In each case reference to paragraphs 1.6. should read 1.7	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
SSE018	UNC-TPD	C	1.7.4		reference should be to 1.7.3 not 1.6.3.	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.
SSE019	UNC-TPD	C	1.7.5		references should be to 1.7.2 and 1.7.4 and 1.7.3.	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.
SSE023	UNC-TPD	C	2.5.1 and 2.5.2		reference should be to 1.6	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.
SSE024	UNC-TPD	C	3.2.4		Replace NTS with Total System to reflect that input nominations are made at LDZ Entry Points	Disagree: the Mod which removed UGF was specific to NTS inputs.	No change.
SSE025	UNC-TPD	C	4.1.10		reference should be to 1.10.2	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.
SSE026	UNC-TPD	C	4.2.1		Reference should be to 1.6	Accepted: this was a cross-referencing error.	Cross-referencing error corrected.
SSE027	UNC-TPD	D	1.1.1 and 1.2.1(a)		Why does this still refer to LDZ stock when OPNs from DN should reflect LDZ stock?	Accepted in context of NTS.	Drafting of 1.2.1(a) amended accordingly.
SSE028	UNC-TPD	D	1.3.1(b)		line 5 reference should be to J.4 not J44 and to Provisions not Agreement	The text does not refer to J44 as one of the "4"s has been struck-through. Accepted re "Provisions".	Drafting amended accordingly.
UU010	UNC-TPD	D	1.4(g)		Is the reference to Operational Guidelines" still appropriate given that this has been removed from D1.1.4?	Accepted.	To be reflected in final drafting.
UU011	UNC-TPD	D	2.1.1		"Standard Condition [9(3A)]" should read "Standard Special Condition A11(22A)"	Accepted.	Drafting amended accordingly.
SSE033	UNC-TPD	E	3.4		these definitions have been deleted but believe that they are used elsewhere in TPD, e.g. J.1.3.3(d)	Accepted.	Definition of User Daily NTS Offtake Quantity reinstated in Section J.
SSE032	UNC-TPD	E	1.11.2		This states that quantity of gas offtaken at an Inter-System Offtake by DNO in capacity of Shrinkage Provider will be determined in accordance with the OAD. Please could Transco clarify where this is referenced.	On further consideration we consider that this is dealt with by Section N.	Provision deleted.
MGN003	UNC-TPD	E	1.4.1		Incorrect cross reference, replace E3.5 with E3.4	Unable to identify exact concern	No change.
SSE029	UNC-TPD	E	1.5.1(b)		seems not be consistent with H.1.7.2(b) and 2.5(b)	Transco believe that reference to demand and the assessment shrinkage are consistent and, in any event, have not changed as a result of the conversion to UNC.	No change.
SSE030	UNC-TPD	E	1.9.1(b)		Users should be Users'.	Accepted.	Drafting amended accordingly.
SSE031	UNC-TPD	E	1.9.6(b)		Should reference be to Provisions not Agreement	Accepted.	Drafting amended accordingly.
UU012	UNC-TPD	E	3.4.1		This needs to be reinstated as the term is used in TPD J1.3.3	Noted: term used at J1.3.3.	Definition of User Daily NTS Offtake Quantity reinstated in Section J.
NPow048	UNC-TPD	E	3.4.1 and 3.4.2 and 3.4.3		Why has this text been deleted and does it appear elsewhere	The text has been moved to Section J as this is where the definition is used	Definition of User Daily NTS Offtake Quantity reinstated in Section J.
SSE034	UNC-TPD	E	7.4.2		line 1 – remove "the"	Transco believe that the text is sufficiently clear	No change
UU013	UNC-TPD	E	7.4.4(d)(i) and (ii)		Delete "by the User to" which is covered by the lead in wording.	Accepted	Drafting amended accordingly.
SSE035	UNC-TPD	F	1.2.5		insert "Uniform" before Network Code Committee	Accepted	Drafting amended accordingly.
NPow049	UNC-TPD	F	1.4.3		Why has this text been deleted and does it appear elsewhere	Text has been deleted because it is duplicated in the Network Code following a previous modification	No change.
SSE036	UNC-TPD	F	6.2.3		line 2 - insert "relevant" before User	Accepted	Drafting amended accordingly.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
NPow050	UNC-TPD	G	1.8		Sub deduct arrangements: There are references to both System and Total System Is this appropriate?	The convention is that the supply point is physically attached to "a System" whereas gas offtaken art such a supply point is oftaken from the "Total System"	No change.
NPow051	UNC-TPD	G	1.1.1(b)		Replace "User" with "Shipper User"	As DNO Users are specifically excluded from this Section, a User can only be a "Shipper User"	No change.
UU014	UNC-TPD	G	1.16.2(e)		The reference to the Shippers licence is incorrect as the change should have been made to the reference to the Suppliers licence	Accepted	Drafting amended accordingly.
SSE038	UNC-TPD	G	1.8.6 line 8		delete "Total"	Accepted	Drafting amended accordingly.
SSE039	UNC-TPD	G	1.9.1		Need to qualify that obligation to maintain Supply Point Register relates only to the DN's system(s)	Accepted.	Drafting amended accordingly.
NPow052	UNC-TPD	G	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	Confirm these Guidelines will be a joint ownership document under the UNC.	In G1.9.12, "the transporter" changed to "transporters".
SSE040	UNC-TPD	G	2.1.10(a)		move opening bracket in line 2 to after "and"	Accepted	Drafting amended accordingly.
UU015	UNC-TPD	G	2.1.10(b)		After "in favour of the Transporter" insert "(or Transco NTS as appropriate)"	Accepted	Drafting amended accordingly.
MGN004	UNC-TPD	G	2.5.1(b)		therefor should read thereof	Unable to identify exact concern	No change.
SSE041	UNC-TPD	G	3.7.5		line 3 should read "a System"	Accepted	Drafting amended accordingly.
UU016	UNC-TPD	G	3.7.5 line 3		""the System" should read "a System"	Accepted	Drafting amended accordingly.
SSE042	UNC-TPD	G	3.8.1		line 1 should this read "a System"?	Accepted	Drafting amended accordingly.
UU017	UNC-TPD	G	3.8.1(a)		"Total System" should read "a System"	Accepted	Drafting amended accordingly.
SSE043	UNC-TPD	G	6.10.5(c)		line 2 – big space before (	Accepted	Drafting amended accordingly.
UU018	UNC-TPD	G	6.11.16		delete "J"	Accepted	Drafting amended accordingly.
SSE044	UNC-TPD	G	7.3.6(a)(i)		Line 2 – insert "Total" before System	Accepted	Drafting amended accordingly.
UU019	UNC-TPD	G	7.3.6(a)(i)		"System" should read "Total System"	Accepted	Drafting amended accordingly.
SSE045	UNC-TPD	G	Annex G-2		Annex G2 last paragraph of 1 – Reference should be to the "Transportation" Principal Document (three insertions required)	Accepted	Drafting amended accordingly.
UU020	UNC-TPD	G	Annex G-2 para 4.4		"Sharing" should read "Shared"	Accepted	Drafting amended accordingly.
SSE037	UNC-TPD	G	general comment		We note that a general clause has been included under GT.B.2.1.3 to clarify that the Transporter in context of a Supply Point means in relation to network supply point is located on.	Noted.	No change.
SGD002	UNC-TPD	general comment			While we welcome Transco response to requests for the Business Rules to be circulated, we are concerned that these rules were not always consistent with the Guide with the Rules suggesting no Class 2 or 3 changes but the Guide stating that these existed. It is somewhat unusual to have detailed legal drafting produced (and consulted upon) without any final business rules against which to check drafting for consistency and accuracy.	Revised UNC Development Forum business rules were provided during the drafting review to assist with the initial stages of the drafting review. However, once the legal drafting process commenced in earnest, as issues were raised, they were logged and resolved on an issue log. It was always the intention that Detailed Business Rules would fade into the background once the legal text became more established and the definitive document recording the changes.	No change.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	TOT001	UNC-TPD	general comment			Page numbering throughout the document is inconsistent - e.g. V-1, V-2 or Section A 1,2,3 etc TGP do not believe that it is perfectly clear that in all instances when a Transporter's UNC refers to a supply point whether it is a supply point connected to that Transporters network? For example re TNI Supply Points, is the UNC absolutely clear in interpretation that a Transporter could only designate an Interruptible Supply Point as being a TNI Supply Point if that Supply Point was connected to that Transporter's network. It may be sensible to clarify this in the various Supply Point definitions	Comment noted ; addressed in revised version	Drafting amended accordingly.
	SSE048	UNC-TPD	H	2.2		In the previous legal drafting meeting Transco was to verify the definitions	Accepted; H2.2.2 amended.	Drafting amended accordingly.
	NPow053	UNC-TPD	H	1.4.2		Missing Word: Uniform before Network Code Committee Reference: Section B General Terms 10	Accepted	Drafting amended accordingly.
	SSE046	UNC-TPD	H	1.4.2		insert "Uniform" before Network Code Committee	Accepted	Drafting amended accordingly.
	NPow054	UNC-TPD	H	1.6.5(b)(i)		Should have sight of document specifying NDM Sampling information, needs to be available to Shippers.	This information is provided to DESC members who monitor sample distribution numbers as part of its normal operation.	
	NPow055	UNC-TPD	H	1.6.6		Shouldn't it be more precise as to how often the consultation should take place ( e.g. every 5 years)?	The performance of samples and the algorithms is routinely considered by DESC. It has not been considered to be necessary to be prescriptive about this. We would anticipate that should any party believe that such a consultation should be necessary it would ensure the matter is raised with DESC or the Uniform Network Code Committee, and, if subsequently it were not satisfied it might consider raising a UNC Modification Change Proposal.	No change
	NPow056	UNC-TPD	H	1.8.1		Missing Word: Uniform before Network Code Committee	Accepted	Drafting amended accordingly.
	SSE047	UNC-TPD	H	1.8.1		insert "Uniform" before Network Code Committee	Accepted	Drafting amended accordingly.
	NPow057	UNC-TPD	H	1.8.6		Missing Word: Uniform before Network Code Committee	Accepted	Drafting amended accordingly.
	UU021	UNC-TPD	H	1.9.2		"Condition 9(3)" should read "Condition A11(18)"	Accepted	Drafting amended accordingly.
	TOT002	UNC-TPD	H	5.2.7		Whilst we recognise that H5.2.7 requires the Transporter to exercise reasonable skill and care in forecasting demand, we now believe that there should be a Standard of Service on Transco NTS in view of the potential for a deterioration in the quality of the Total System Demand forecast arising from an increase in the number of parties providing the component information.	The Code Obligation on transporters in this regard have not been diluted and it is not appropriate at this juncture to introduce not transporter obligations. This could be something which is reviewed over time.	No change.
	UU022	UNC-TPD	I	1.1.4		Replace "NTS/LDZ Offtakes" with "Inter System Offtakes"	Accepted	Drafting amended accordingly.
	SSE050	UNC-TPD	I	1.2.4		reference should be to J.6.3	Accepted; reference corrected.	Drafting amended accordingly.
	SSE051	UNC-TPD	I	3.7.1		As gas is tendered for delivery via nominations DNs need to have access to relevant information pertaining to shippers' intended gas flows onto their systems. We believe that this should be covered under TPD Section C.1.1.7. We understand that there are provisions in the OAD to allow Transco to inform the DN of the aggregate available firm NTS entry capacity held by shippers at relevant entry points ahead of/on the day in order for the DN to be able to comply with this clause.	Still maintain inter-operator flow notifications are of more value for this purpose, and nominations are required to underpin the scheduling rules. Transco are looking at ways of making relevant shipper nom information available to DNOs	No change.
	SSE052	UNC-TPD	I	3.7.1		Last line – should read "Adjusted pursuant to Section B.2.10.8".	Accepted	Drafting amended accordingly.

							Business Owner	
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SSE049	UNC-TPD	I		general comment	There is not consistent use of Transco/Transporter in this Section	We believe that the references are consistent, with "Transco" used only the reference is historical. One minor change is required to ensure this distinction is applied.	One minor drafting correction to change "Transco NTS" to "Transco"
	STA003	UNC-TPD	J	1.2		In section A3, a System exit Point is defined as a Supply Meter Point or a Connected System Exit Point. However in section J, references to System Exit Points include inter system Offtakes. Correction required.	Transco believe that the text is sufficiently clear	No change.
	SSE056	UNC-TPD	J	1.5		Line 2 delete "to or" Line 2 Should "a System" be "the Total System"?	Transco believe that the text is sufficiently clear	No change
	STA004	UNC-TPD	J	1.5		Why is the reference to Network exit Agreement changed to Network Exit Provisions? Is there any change other than name change here?	Transco believe that the text is sufficiently clear	No change.
	EDF003	UNC-TPD	J	2.5		The rules are not clear as to how Transco will prioritise User's applications for increase offtake pressures and whether the calculation will be non-discriminatory.	<p>The pressures detailed in the OCS for the interim period represent the pressures that have been agreed between the NTS and the DNs and which are consistent with providing 1 in 20 security within the LDZs. The application process recognises that pressures other than those agreed could be the subject of an application process. Where such applications are made Transco would need to assess such applications against the criteria defined in the legal drafting and in the context of its Licence obligations. These obligations include a requirement not to be unduly discriminatory.</p> <p>During the interim period any revised pressures for DNs would feature in revised OCS and therefore should any party believe that it has been subjected to undue discrimination it would be at liberty to make representations to Transco and might ultimately, if it was subsequently not satisfied, refer the matter to Ofgem for determination.</p>	No change.
	SSE079	UNC-TPD	J	3.10		Please could Transco confirm that the DNO will not be in breach of any of the provisions of 3.10 when Transco NTS has accepted a revised OPN under 4.5.5(b) or where the DN has responded to a request from Transco NTS under OAD Section I to modify its OPN. We believe that this is easily clarified via a cross-reference to the relevant provisions of J.7. We have proposed an additional clause 7.4.3. which we believe addresses this point.	We recognise the concern raised. We have proposed revised drafting to address the issue.	Drafting amendments made by insertion of OAD I 2.4.4 to clarify old 2.4.3(b), and amendment to J4.5.2, and to J3.10
	SSE080	UNC-TPD	J	3.10		Renumber paragraph 3.10.7 as 3.10.3 Renumber paragraph 3.10.8 as 3.10.4 Renumber paragraph 3.10.9 as 3.10.5	Accepted	Drafting amended accordingly.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
MGN005	UNC-TPD	J	3.11		Incorrect cross-reference, replace J3.10 with J3.11	Accepted	Drafting amended accordingly.
NPow058	UNC-TPD	J	3.11		Replace reference to PGT in the title as these no longer exist	Accepted	Drafting amended accordingly.
SSE087	UNC-TPD	J	4.3		We suggest a "sense-check" of this clause to ensure that it is consistent with provisions in the OAD.	We have checked out this clause and consider it to be consistent.	No change.
SSE096	UNC-TPD	J	5.8		This clause will require updating to accommodate BETTA.	This is recognised but does not necessarily have to be changed for Day 1 although we recognise that it should, and will, be amended to reflect BETTA implementation later.	No change.
NPow059	UNC-TPD	J	7.1		What happens if both the upstream and downstream Transporters claim they have complied but the Shipper User still cannot get gas	We have reviewed the drafting. Provisions not intended to affect shipper rights.	Drafting amended accordingly.
UU506	UNC-TPD	J	7.4		We do not consider it appropriate that DNOs are liable for tolerance excursions when the same treatment is not applied to direct connects.	We recognise the concern raised and have amended the drafting so that the DN will not be financial exposed in the event of non-compliance with the OPN tolerances. However the DNs (like the Direct Connects) still have a contractual commitment to ensure that gas offtaken from the system does not exceed or is less than the rate associated with the OPN by more than the appropriate tolerance.	Drafting amended accordingly.
SSE053	UNC-TPD	J	1.1.2		Line 2 should reference to "a System" be the same as in 1.2.1 "Total System or a part of the Total System"?	Ref should be to J1.1.2 but Transco believe that the text is sufficiently clear	No change
SSE054	UNC-TPD	J	1.2.3		line 1 - comma required after 4.	"4" has been struckthrough, no comma required	No change
NPow060	UNC-TPD	J	1.3.1		Need definition of downstream transporter as used in 3.5.7.d and 7.1	3.5.7 and 7.1 don't define downstream transporter. We consider the drafting in J 1.3.1 to be appropriate.	No change.
TOT004	UNC-TPD	J	1.3.1 (d)		Should "the downstream DN operator ...." read " the downstream transporter ....".	We believe the drafting to be appropriate.	No change.
UU023	UNC-TPD	J	1.3.2(d)		"have" should read "having"	Accepted	Drafting amended accordingly.
SSE055	UNC-TPD	J	1.3.3(d)		where is User Daily NTS Offtake Quantities defined – seems to have gone from Section E.3.4.1	Accepted	Drafting amended accordingly.
NPow061	UNC-TPD	J	1.5.4(c)		Should this read Network Exit Provisions	Yes this should read Network Exit Provisions but the ( c ) should be deleted but not the clause	Typo to be amended; need to delete ( c ) (but not the associated words)
SSE057	UNC-TPD	J	1.5.4(c)		replace "Entry" with "Exit"	Accepted	Drafting amended accordingly.
SSE058	UNC-TPD	J	1.5.7		reference should be to paragraph 5	Accepted	Drafting amended accordingly.
NPow062	UNC-TPD	J	2.1.1(a)(ii)		Should this also include CSEP Exit points	Dealt with by CSEP Ancillary Agreements where appropriate.	No change.
SSE059	UNC-TPD	J	2.1.5		[Individual]?	Accepted	Drafting amended accordingly.
SSE060	UNC-TPD	J	2.1.6		line 2 should "a System" be "the Total System"?	Accepted	Drafting amended accordingly.
SSE062	UNC-TPD	J	2.2.1		line 3 – Should "a System" be "the Total System"?	Transco believe that the text is sufficiently clear	No change
SSE061	UNC-TPD	J	2.2.4 and 2.2.5		2.2.4 line 3 and 2.2.5 line 2 - delete "Network"?	Accepted	Drafting amended accordingly.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SSE063	UNC-TPD	J	2.4.2		line 4 - delete "Network"?	Accepted	Drafting amended accordingly.
	SSE064	UNC-TPD	J	2.5.2		The Offtake Capacity Statement for Scotland seems to be inconsistent with this clause which provides that 0600 and 2200 pressures should be the same as those specified in previous year's OCS.	Given that only the first OCS has been provided we are surprised at this observation. The clause provides that once pressures have been declared for year "n", when a subsequent OCS is published that the pressures for year "n" will be at least as high as indicated in the previous OCS. The effect of this is that once a pressure has been "declared" it cannot be reduced with respect to the OCS commitment.	No change.
	SSE065	UNC-TPD	J	2.5.2		line 4 – should "year" be "Year"?	"Year" in this context is not a defined term	No change
	SSE066	UNC-TPD	J	2.5.3		last line suggest insertion of comma after Year	Transco believe that the text is sufficiently clear	No change
	SSE067	UNC-TPD	J	2.5.4		We note that the DNO may apply to increase Assured Offtake Pressures at an Offtake for a relevant Gas Year.	Noted.	
	STA005	UNC-TPD	J	3.1.3		Shippers could be affected here by the mis-match of gas offtaken quantities between an inter-system offtake and a shipper user from the downstream system. What if the quantities of gas offtaken at an inter system offtake is incorrectly measured.	The arrangements have been designed to deliver the "status quo". From a shipper perspective the proposals represent no change from the current regime. If an inter-system offtake is incorrectly measured then the provisions currently applied in respect of such measurements are codified in the OAD. Amendments after the Exit measurement "D+5" closeout will be treated exactly as they are now.	No change.
	UU029	UNC-TPD	J	3.10.2 onwards		the numbering of the paragraphs is incorrect here.	Accepted	Drafting amended accordingly.
	NPow063	UNC-TPD	J	3.10.3 to 3.10.6		These should not be sub clauses but should be part of 2.10.2.	Agreed numbering requires revision	Numbering to be revised.
	SSE081	UNC-TPD	J	3.10.5(a)(ii)		should "or" be "and"?	Cannot locate reference	No change
	SSE082	UNC-TPD	J	3.10.5(a)(iii)		Reference to B6.4 should be to 6.5.4 and 6.5.5	Agreed	Drafting amended accordingly.
	NPow064	UNC-TPD	J	3.10.9		Replace User in the second line with "DNO User"	User can only mean DNO User in this context	No change.
	NPow065	UNC-TPD	J	3.10.9(a)(iii)		Referred clause should be B.6.5 not B.6.4	Accepted	Drafting amended accordingly.
	SSE083	UNC-TPD	J	3.11.1		reference should be to 3.11 not 3.10	Accepted	Drafting amended accordingly.
	SSE084	UNC-TPD	J	3.11.1		reference should be to 3.11 not 3.10	Accepted	Drafting amended accordingly.
	UU030	UNC-TPD	J	3.11.1		The reference to 3.10 should be to 3.11	Accepted	Drafting amended accordingly.
	SSE085	UNC-TPD	J	3.11.7		a) reference should be to 3.11 not 3.10 (appears twice) b) reference to Transco should be to "the Transporter".	Accepted.	Drafting amended accordingly.
	UU031	UNC-TPD	J	3.11.7		The references to 3.10 should be to 3.11 (appears twice)	Accepted	Drafting amended accordingly.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SSE068	UNC-TPD	J	3.3.5		Could Transco clarify how the DN gets notice of non-compliant gas being made available?	We would envisage that the GNCC would advise the ACC (during the SOMSA) as a matter of urgency to ensure the appropriate operational decisions to mitigate the attendant risks. Such an event would trigger an "incident report" and this would generate further written communication to the DN.	
	MGN006	UNC-TPD	J	3.3.7		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	Noted.	Revised drafting provided.
	SSE069	UNC-TPD	J	3.3.7		Please could Transco clarify the status of this clause which is currently in square brackets	Now updated.	Drafting amended accordingly.
	UU024	UNC-TPD	J	3.3.7		We understand that Transco is still considering the drafting of this clause in the light of the points raised by DNs in the legal drafting sessions	Accepted	Drafting amended accordingly.
	NPow066	UNC-TPD	J	3.4.1(c)		Remove "of" after liability in the last line	Agreed	Remove "of" after liability
	SSE070	UNC-TPD	J	3.4.1(c)		Line 4 – delete second "of"	Accepted	Drafting amended accordingly.
	UU025	UNC-TPD	J	3.4.1(c) line 4		delete "of" after "liability"	Accepted	Drafting amended accordingly.
	SSE071	UNC-TPD	J	3.4.2(a)(iii)		This clause was to be redrafted following the legal drafting in February to recognise that more than one System could be supplied via an Inter-System Offtake	An Offtake is defined as serving one LDZ only.	No change.
	UU026	UNC-TPD	J	3.4.2(a)(iii)		"System" should read "System(s)" as more than one LDZ may be affected.	Each offtake is categorised so that it only feeds one system - rejected	No change.
	NPow067	UNC-TPD	J	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.	The principle underpinning the drafting was that the liability cap should apply in respect of non-compliant gas only and should exclude any payments that might arise in the context of "gas not made available for offtake".	No change
	SSE072	UNC-TPD	J	3.4.3		line 4 – insert "Total" before System.	Transco believe that the text is sufficiently clear	No change
	SSE073	UNC-TPD	J	3.4.6		line 2 reference should be to 3.4.5(a)(i) or (ii)	Accepted.	Will be reflected in final version.
	UU027	UNC-TPD	J	3.4.6		The second (i) should read (ii)	Accepted	Drafting amended accordingly.
	SSE074	UNC-TPD	J	3.5.1(a)		line 2 – insert "Total" before System	Transco believe that the text is sufficiently clear	No change
	SSE075	UNC-TPD	J	3.5.1(b)		line 1 should read "a System" or "the Total System"	Transco believe that the text is sufficiently clear	No change
	SSE076	UNC-TPD	J	3.5.3		definition of X – line 2 - insert "Total" before System	Transco believe that the text is sufficiently clear	No change
	SGD008	UNC-TPD	J	3.5.7		Is an "Offtaking User" the same as a "DN User" or does this include "Shipper User" as well? It is difficult to understand the implications of this paragraph but assume it to mean DN User.	Section J 3.1.1 ( c ) defines the downstream DN Operator as the Offtaking User in respect of an Inter-System Offtake.	
	UU028	UNC-TPD	J	3.5.7(a)		"downstream System" should read "downstream System(s)"	Each offtake is categorised so that it only feeds one system - rejected	No change.



						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
NPow068	UNC-TPD	J	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.	Section J 3.1.1 (c) defines the Offtaking User in respect of an Inter-System Offtake as the downstream Transporter. The Offtaking User defined in 3.5.7 (a) is therefore the downstream Transporter. The provisions of J 3.5 enable a User affected by gas not made available for offtake to be recompensed by the relevant transporter. A shipper will therefore not need to get involved in respect of who was to blame for the failure; the shipper will deal with the relevant transporter. The 3.5.7 (c) addresses the issue whereby the downstream transporter might be recompensed where it has incurred liabilities payments to its users, but where such failure resultant from the failure of the upstream transporter	No change.
SSE077	UNC-TPD	J	3.5.8		should reference to Transco NTS be to upstream Transporter? Couldn't a DN be the upstream Transporter?	Transco believe that the text is sufficiently clear	No change
NPow069	UNC-TPD	J	3.5.8(b)		GS/OS payments be excluded from payments to Shippers. Delete this clause in its entirety	Shippers will be unaffected. This relates to inter-transporter obligations.	No change.
NPow070	UNC-TPD	J	3.6.2		The paragraph starting "Where in relation to any Day" should be para 3.6.3	Accepted	Drafting amended accordingly.
NPow071	UNC-TPD	J	3.7.4(a)		Change "User" to "Shipper User"	Transco believe that in the context of this paragraph the "User" is the shipper	No change.
NPow072	UNC-TPD	J	3.7.4(b)		Delete the words "by that User"	Transco believe that the text is sufficiently clear	No change.
SSE078	UNC-TPD	J	3.8.2(b)		Should references be to "Total System" rather than "relevant System"?	Transco believe that the text is sufficiently clear - a transporter can only make a judgement in the context of its own system	No change
NPow073	UNC-TPD	J	4.1.1		Replace "further to" with "in addition to"	Transco believe that the text is sufficiently clear	No change.
SSE086	UNC-TPD	J	4.1.1		line 3 - should "relevant System" be "Total System"?	Transco believe that the text is sufficiently clear	No change
NPow074	UNC-TPD	J	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)	The arrangements do not extend the scope or amend current NExAs. See also J1.5.6. Cross-referencing error noted.	No change re NExAs. Change reference to 4.8 to 4.7.
NPow075	UNC-TPD	J	4.1.3		There is no paragraph 4.8 (check paragraph cross references). Also "and" in the second line should read "or"	Accepted.	Drafting amended accordingly.
STA006	UNC-TPD	J	4.3.1 and 4.3.3 and 4.4		It is not clear why the provisions of 4.3.1, 4.3.3 and 4.4 will need to apply to the Network Exit Provisions of a CSEP in a multi transporter environment where they were not necessary before.	This is a structural change with no substantive effect, putting common provisions for Network Exit in a single place in J4.3. Later provisions set out requirements specific to Exit point type.	No change.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SSE088	UNC-TPD	J	4.3.1(f)		Under A.3.4 an Inter-System Offtake is a NTS Exit Point which would suggest that they are captured under Section L, however Section L4.3.2(a) doesn't seem to apply to DNO Users?	Accepted.	Drafting amended accordingly.
	SSE089	UNC-TPD	J	4.3.2(a)		line 4 replace Agreement with relevant Provisions	Accepted	Drafting amended accordingly.
	SSE090	UNC-TPD	J	4.3.2(c)		insert Total before System line 2	Transco believe that the text is sufficiently clear	No change
	SSE091	UNC-TPD	J	4.3.3(c)		incorrect references to 5.8.1(a) and (b) – should be ?	Accepted	Drafting amended accordingly.
	SSE092	UNC-TPD	J	4.5.2		insert "relevant" before System on line 2?	Accepted	Drafting amended accordingly.
	NPow076	UNC-TPD	J	4.5.5		Paragraph 7.3.2 applies to DNOs at Inter System Offtakes but OPNs can be made by Shipper Users too.	The clause applies to both NTS/LDZ offtakes and Direct Connects.	No change.
	SSE093	UNC-TPD	J	4.5.5(b)		If more than one User has made a request under this clause then Transco will use the gate closure allocation methodology (J.7.3.2) to decide who gets to increase offtake. We look forward to seeing this methodology. It would seem appropriate to consider access to the short run system flexibility product to ensure that the DN can access within-day flow rates consistent with continued safe and efficient operation of the system Reference should be to 7.3.1	Unless behaviours change significantly we anticipate that the operational requirements of DNs and Direct Connects can be satisfied. We will seek to establish the methodology for short term flexibility access to achieve a satisfactory outcome. The reference to 7.3.2 is incorrect and will be amended to 7.3.1.	Amend reference.
	UU032	UNC-TPD	J	4.5.5(b)		The reference to 7.2.1 should be to 7.3.1	Accepted	Drafting amended accordingly.
	NPow077	UNC-TPD	J	4.5.6(a)		Add "and/or;" at the end	Transco believe that the text is sufficiently clear	No change.
	NPow078	UNC-TPD	J	4.5.6(c)		This is not a sub paragraph but part of 4.5.6.	Agreed	Delete ( c) subheading but leave associated text
	NPow079	UNC-TPD	J	4.5.9		Para ref 4.6 should read 4.5 but is "Permitted Offtake Rate" Used in 4.5	Agreed	Amend reference 4.6 to 4.5
	UU033	UNC-TPD	J	4.5.9		The reference to 4.6 should be to 4.5	Accepted	Drafting amended accordingly.
	NPow080	UNC-TPD	J	4.5.9(c)		3.10.3 should be what is currently shown as 3.10.7	Accepted.	Drafting amended accordingly.
	SSE094	UNC-TPD	J	4.6.2		line 2 insert "Total" before System	Agreed; changed to "a" system.	Drafting amended accordingly.
	SSE095	UNC-TPD	J	4.6.3		delete (c) so clause runs together	Accepted	Drafting amended accordingly.
	UU034	UNC-TPD	J	5.3.1		The reference to 5.6 should be to 5.7	Accepted	Drafting amended accordingly.
	SSE097	UNC-TPD	J	5.8.2 (a) and (b)		replace "Exit" with "Point"	Accepted	Drafting amended accordingly.
	SSE098	UNC-TPD	J	5.8.2(f)		delete Exit	Accepted	Drafting amended accordingly.
	NPow081	UNC-TPD	J	6.4.3		Is "gas Transporter" the correct term for any party with a GT licence which this is trying to say?	Rejected	No change.
	NPow082	UNC-TPD	J	6.4.3(a)		Is "Transporter" in the first line correct or should this mean "gas Transporter"	Rejected	No change.
	SSE099	UNC-TPD	J	7.1.1		line 2 replace "the" with "its". Line 3 replace "its" with "the".	Transco believe that the text is sufficiently clear	No change.
	SSE100	UNC-TPD	J	7.1.2		line 2 – replace "the" with "its" and replace "its" with "the"	Transco believe that the text is sufficiently clear	No change.
	UU035	UNC-TPD	J	7.1.2		This should also make clear that the DN is not in breach if it has complied with a request from the upstream transporter or the transporter has agreed a variation etc	The drafting of 7.1.2 has been amended. The waivers associated with flow mapping and user requests for access to short term flexibility are addressed in OAD Section I 2.4 and Section J 4.5.6	Drafting amended accordingly.
	SSE101	UNC-TPD	J	7.3.1(a)		typo "paragrah" should be "paragraph"	Accepted	Drafting amended accordingly.
	SSE102	UNC-TPD	J	7.3.1(b)(ii)		"anyu" should read "any"	Accepted	Drafting amended accordingly.
	NPow083	UNC-TPD	J	7.3.2		Need sight of the the allocation principles referred to	These are being worked upon and will be shared with the community.	No change.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SSE104	UNC-TPD	J	7.3.2		we are still waiting to see this allocation principles	Noted.	No change.
	SSE103	UNC-TPD	J	7.3.2		Typo "Tranco" should be "Transco"	Accepted	Drafting amended accordingly.
	UU036	UNC-TPD	J	7.4.1		Please insert at the beginning "Subject to paragraph 7.1.2"	Accepted	Drafting amended accordingly.
	MGN002	UNC-TPD	J	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	We recognise the concern raised and have amended the drafting so that the DN will not be financial exposed in the event of non-compliance with the OPN tolerances. However the DNs (like the Direct Connects) still have a contractual commitment to ensure that gas offtaken from the system does not exceed or is less than the rate associated with the OPN by more than the appropriate tolerance. We would expect to monitor flow performance against OPNs and to report regularly to the Operational Forum with particular regard to the frequency and extent of tolerance breaches	Drafting amended accordingly.
	NPow084	UNC-TPD	J	7.4.1(a)		Missing and "and;" at the end	Other drafting changes subsume this.	No change.
	SSE105	UNC-TPD	J	7.4.1(a)		In light of comments above in respect of 4.5.5 we believe that this clause should be reworded as follows: "the downstream DN Operator does not comply with any of the requirements of paragraph 7.2 in relation to an Inter-System Offtake;"	We recognise that J 4.5 should be extended to facilitate, where such capability is available, greater access to system flexibility. Therefore we have made amendments that facilitate applications for greater access to increased flow flexibility and where such requests are accepted, and the OPN is submitted within 15 minutes, the holding of flexibility capacity will be increased consistent with the application. The drafting is contained in J 7.3.	Drafting amended accordingly.
	NPow085	UNC-TPD	J	7.4.1(d)		othe should be replaced with "other" and ad and "or" between "person" and "consumer"	Agreed	Typos to be corrected in drafting
	SSE106	UNC-TPD	J	7.4.1(d)		typo "othe" should be "other"	Accepted	Drafting amended accordingly.
	UU037	UNC-TPD	J	7.4.1(d)		Typo in "other". Also the word "person" is redundant	Accepted	Drafting amended accordingly.
	NPow086	UNC-TPD	J	7.4.2		Operator spelt incorrectly and paragraph 7.3.1 should read 7.4.1	Accepted	Drafting amended accordingly.
	SSE107	UNC-TPD	J	7.4.2		typo - should read "DN Operator"	Accepted	Drafting amended accordingly.

							Business Owner	
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	SSE108	UNC-TPD	J	7.4.2		<p>should the cross reference 7.3.1 be 7.4.1?</p> <p>Add a new paragraph 7.4.3 as follows: "The downstream DN operator shall not be in breach of the requirements of paragraph 7.2 where it has exercised a right or entitlement pursuant to or complied with an obligation under the Code or the Offtake Arrangements Document or has acted in accordance with a request of the upstream Transporter."</p>	<p>Accepted re cross-reference. The reference contained within J 7.4.2 is incorrect and has been replaced with the correct reference J 7.4.1. We have refined the drafting of J 7.1 to recognise that the transporters should not be in breach of obligations to make gas available for offtake where it has complied with the terms of the OAD. We have also amended the drafting so that where the DN satisfies a request from the NTS under OAD Section I 2.4 then the resulting OPNs shall not be considered to be in breach of exceeding the maximum permitted rate or NTS offtake capacity holdings</p>	<p>Cross-referencing error corrected. Revised drafting addresses other point.</p>
	CE002	UNC-TPD	J	general comment		<p>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.</p>	<p>We believe that these comments relate to the enduring arrangement proposals and not to the interim proposals. Most of the examples quoted are not features that impact on the interim, e.g. baselines may be relevant to DNs incentives but have little relevance in the UNC drafting, no trading of NTS exit capacity is envisaged in the interim and so interchangeability factors are irrelevant, prices will be determined in accordance with current methodologies etc etc.. We would welcome clarification of any of the issues considered germane to the functioning of the interim arrangements as a matter of urgency.</p>	<p>No change.</p>

							Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD	
EON004	UNC-TPD	J	general comment		E.ON UK has expressed its opposition to the introduction of a flow-flexibility product through various meetings and letters to the Authority. We do not, therefore, see any justification for incorporating a mechanism that could allow Transco to charge for flow flexibility as part of these interim arrangements. The flow flexibility charge should be removed as it is not necessary for day1 of the UNC. If the Transporters or shippers become concerned about the use of flexibility that cannot be dealt with through the day 1 Transco/DNO administered operational arrangements, Network Exit Agreement terms or relevant system management tools then parties will bring forward proposed changes to the UNC or other relevant documents. Nothing in the day 1 UNC should hinder or facilitate the so called enduring offtake arrangements as such proposals have yet to be brought forward as an official code modification proposal. Only if or when such a modification proposal is approved should charging for flexibility be included in the UNC.	No charging envisaged for flexibility capacity (or use thereof) in the interim arrangements. Flexibility capacity has been introduced in the interim arrangements, but only for DNs. The provision of NTS diurnal storage to support the economic and efficient development and operation of the LDZs has been an integral part of the integrated Transco development and operational processes. The introduction of the flat and flexibility capacity products into the interim arrangements for DNs replicates current arrangements between NTS and DNs and therefore represents an essential feature of the interim arrangement if such economies and efficiencies are to be maintained.	No change.	
SGD007	UNC-TPD	J	general comment		We reiterate our view that many of these of these changes are not necessary for the DN Sale (although clearly are). Their introduction appears to be pre-empt any detailed consultation on the enduring exit arrangements by presuming a certain change. It should be considered possible to remove much of this drafting if detailed proposals for exit and flexibility products can not be demonstrated to further the Relevant Objectives.	The proposals are appropriate and proportionate for the interim period. They reflect the requirement for exit capacity allocation to the DNs and afford an approach to achieve such allocation building on current processes and procedures, both as they relate to investment and operational processes.		
TOT003	UNC-TPD	J	general comment		TGP believe the readability of this section of the UNC would be greatly improved if it were to be split into two sections, the first being general/common exit requirements and the second section relating to specific exit requirements necessary to address the DN/NTS relationship.	Rejected	No change.	
NPow087	UNC-TPD	K	1.2 and 1.3		These clauses should be combined in a single clause entitled "Transco NTS as a User" with each type of User included. There is no definition of a NTS User as seems to be implied by the title of Clause 3.	GT Section B has this effect.	No change.	
SSE109	UNC-TPD	K	3.2.6		Given the footnote, why does 3.2.8 refer to Managers?	The concept of relevant System manager was used when there were separate system managers for Top-up and Operating Margins. The Top-up role has since been removed but will reappear shortly in the context of constrained Top-up.	Removed footnote.	
NPow088	UNC-TPD	K	3.3.4		Why has this been deleted	This has been deleted to ensure that all Shrinkage providers have access to the same shrinkage management tools. DNOs could not input gas into the NTS	No change.	

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	EDF004	UNC-TPD	L	1.4		We are generally supportive of the changes in this section but would urge Transco to include greater obligations on all parties to ensure that GT's maintenance plans are aligned where possible with Users. We would suggest a Reasonable Endeavours obligation on GTs to communicate their maintenance plans under the same time scales so that opportunities to align maintenance periods and reduce disruption to the UK Gas System are captured by all parties. This would increase the economic and efficient operation of the UK gas transportation system and market.	We welcome the support from EDF for the proposals in this area. The proposals provide for co-ordination of maintenance to minimise disruption to Users and final consumers. There is substantial benefit in the co-ordination of maintenance and the arrangements for further information exchange between NTS and DNs and the process for deriving maintenance plans are covered further in the OAD part of the UNC.	No change.
	NPow089	UNC-TPD	L	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	Accepted.	Drafting amended accordingly.
	SSE113	UNC-TPD	L	3.3		How is DN involved in this process?	The proposals provide for co-ordination of maintenance to minimise disruption to Users and final consumers. There is substantial benefit in the co-ordination of maintenance and the arrangements for further information exchange between NTS and DNs and the process for deriving maintenance plans are covered further in the OAD part of the UNC.	No change.
	SSE114	UNC-TPD	L	3.4		How is DN covered by this paragraph?	The proposals provide for co-ordination of maintenance to minimise disruption to Users and final consumers. There is substantial benefit in the co-ordination of maintenance and the arrangements for further information exchange between NTS and DNs and the process for deriving maintenance plans are covered further in the OAD part of the UNC.	no chage.
	SSE111	UNC-TPD	L	1.1.1 and 1.3		Why do 1.1.1 and 1.3 only refer to NTS when System should be replaced by Total System?	Provision relates only to NTS Maintenance Planning.	No change.
	NPow090	UNC-TPD	L	1.2.4		Why has this been deleted	Declared System Entry Capacity is a term that predates the current rules relating to Entry Capacity	No change.
	NPow091	UNC-TPD	L	2.1.3		Add "Uniform" between "the" and "Network"	Accepted	Drafting amended accordingly.
	SSE112	UNC-TPD	L	2.1.3		2.1.3 reference should be to "Uniform Network Code Committee"	Accepted	Drafting amended accordingly.
	NPow092	UNC-TPD	L	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 Transporter.	There are no obligation on Users in this regard and telling two transporters ensures that the information reaches both promptly and consistently	No change.
	NPow093	UNC-TPD	L	3.2.1(c)		Why have the last two lines been deleted	Declared System Entry Capacity is a term that predates the current rules relating to Entry Capacity	No change.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
NPow094	UNC-TPD	L	3.5.3		Why has this been deleted	Declared System Entry Capacity is a term that predates the current rules relating to Entry Capacity	No change.
SSE115	UNC-TPD	L	4.1.1		appears to apply to Inter-System Points as included in definition of NTS Exit Point in A.3.4.2	Accepted - intention is to exclude Inter-System Offtakes.	Drafting amended accordingly.
SSE116	UNC-TPD	L	4.3.4		line one should read "Section"	Accepted	Drafting amended accordingly.
SSE117	UNC-TPD	L	4.4.1		line 1 – Agreement should read "Provisions"	Accepted	Drafting amended accordingly.
SSE110	UNC-TPD	L	general comment		We believe that the current drafting focuses on NTS requirements and we would expect the OAD provisions to ensure that both Transco NTS and DNOs cooperate to ensure that as far as possible maintenance programmes are coordinated and reflect both parties' requirements.	DNO are excluded as users from Section L. Section L is principally about the NTS maintenance schedule and the gathering and publication of information with shippers. Clearly there is a requirement for a Dno and NTS to coordinate schedules and this is captured in OAD Section G	No change.
EDF006	UNC-TPD	M	1.11		The sentence/grammar "In this Section M references to Users exclude DNO Users" does not make sense	This phrase is consistent with other Sections in the UNC	No change.
NPow095	UNC-TPD	M	2.3		Should have sight of T/PR/GT3 (as referred to in 2.4.2.c)	Noted.	No change.
NPow096	UNC-TPD	M	1.5.3		Need to ensure that these document are updated to reflect DN Sales	Noted.	No change.
UU038	UNC-TPD	M	1.5.3		"Condition [9(3)]" should read "Condition A11(18)"	Accepted	Drafting amended accordingly.
NPow097	UNC-TPD	M	2.1.6		Should have sight of T/PR/GT2 and why has "case by case basis been removed"	Although generic approval for Meter Installations is available under GT2, the text as written does not prevent specific approval being sought, with or with the words "on a case by case basis"	No change.
EDF007	UNC-TPD	M	3.2.13(b)		Last line - word "paragraph" has not been amended in line with the word "paragraphs" in the last line of 3.2.13 (a)(ii)	Accepted	Drafting amended accordingly.
UU039	UNC-TPD	M	3.2.14 line 4		delete additional "the" before "Transporter"	Accepted	Drafting amended accordingly.
EDF008	UNC-TPD	M	3.8.10(a)		No need for an additional "the" as it does not read correctly.	Accepted	Drafting amended accordingly.
SSE118	UNC-TPD	M	3.8.10(a)		line 5 – delete superfluous "the"	Accepted	Drafting amended accordingly.
EDF009	UNC-TPD	M	4.8.6 (b)		Not sure what the GT is required for?	"GT" refers to General Terms	No change.
UU040	UNC-TPD	M	5.2.6(a) and (b)		should "week" read "month"?	Accepted	Drafting amended accordingly.
EDF005	UNC-TPD	M	general comment		Whole document needs a format check re section numbering and numbering and format of indented sections as it is not correct at the moment.	Noted.	No change.
NPow098	UNC-TPD	N	1.2		Does the Transco NTS vent gas and if so why is only the DN Operator referenced	During special operations NTS may vent gas. Such gas is accounted for and included in NTS Shrinkage. The reference to DNs has been included to indicate that the quantities so vented will feature in the relevant DN Operator's shrinkage account	No change.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	EDF011	UNC-TPD	N	1.6		Many sections relating to Shrinkage Scheduling have been removed and so it appears from the legal text that DNOs would be allowed some flexibility in what they nominate and schedule which could put them at a competitive advantage when it comes to exit capacity and flow flex charges. This would be unacceptable. Also, it is not clear whether DNO's would be subject to the same information release obligations as Transco under the DTI information release programme but it might be worth clarifying their obligations here.	DNO shrinkage nominations are determined in a mechanistic manner having regard to the projected LDZ demand and the prevailing shrinkage factor. In that sense they are like any other NDM "nomination"; essentially advisory. It is therefore difficult to see how the DNO's could obtain any peculiar advantage associated with the nominations on this account. The information provisions relate only to NTS Shrinkage Provider.	No change.
	NPow099	UNC-TPD	N	1.6		Why has this been deleted	This clause related to the delivery of shrinkage gas at entry to the system. This is no longer permitted and so the clause has been removed	No change.
	STA007	UNC-TPD	N	1.6		The provisions for Shrinkage Scheduling have been deleted and it is unclear why this has been done. STUK would request clarification from Transco on this issue.	These terms are a hangover of the days when the (Transco) Shrinkage Provider was enabled to procure gas at the beach. This is now prohibited and it is considered appropriate to remove these clauses because they are redundant and would avoid Users and other interested parties wasting time seeking to understand such clauses.	No change.
	SSE123	UNC-TPD	N	4.3		We are unsure where Daily Shrinkage Quantities is defined.	N1.4.4	No change.
	NPow100	UNC-TPD	N	4.4		This clause covers Shrinkage Output nominations but there is no provision for Shrinkage Input Nominations. Is this required ?	No input nominations are permissible. The Shrinkage Provider can only acquire gas at the NBP	No change.
	NPow101	UNC-TPD	N	4.5		Is it appropriate that User should include DNO User, as per 1.5	Rejected. Context would not allow User to mean DNO User.	No change.
	SSE119	UNC-TPD	N	1.1.1		should references on line 3 be to "a System"?	Accepted	Drafting amended accordingly.
	SSE120	UNC-TPD	N	1.3.2(b)		"a System"	Transco believe that the text is sufficiently clear	No change.
	SSE121	UNC-TPD	N	3.2.2(b)		3.2.2.(b) line 3 – delete "the" before "each"	Accepted	Change actioned
	SSE122	UNC-TPD	N	4.1.2(c)		4.1.2(c) delete additional "the"	Transco believe that the text is sufficiently clear	No change.



						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	EDF010	UNC-TPD	N	4.2.2		Not clear from this section whether DNO's can undertake trading for shrinkage purposes similar to Transco and we would be concerned if DNO's were trading on the open market	DNOs should be able to operate their shrinkage accounts in a similar way to Transco does currently. The account is treated like any other, save for the specific restrictions associated with Shrinkage Provider arrangements, and therefore the DNO should have the appropriate commercial freedoms to manage imbalance exposures on this account. The DNO should have access to the "open market" for gas purchases/disposals although it needs to be recognised that such transactions are limited to the NBP and need to be consistent with the DNO's anticipated Licence obligations in respect of prohibited procurement provisions (that are often referred to as the "speculative trading prohibition").	No change.
	STA008	UNC-TPD	N	4.2.2		Reference to Shrinkage Provider making input and output nominations and re-nominations have been deleted. STUK seek clarification from Transco on why these have been deleted from this section.	Input nominations are no longer relevant to the provision of shrinkage gas given that gas for such accounts can only purchase gas at the NBP and so therefore the only "credits" to the Shrinkage Provider accounts can come from NBP Acquiring Trade Nominations.  The references to output nominations relate to those which are those which will be generated by the current methodology (based upon forecast LDZ demand and utilising the relevant LDZ Shrinkage factor). These nominations will be the responsibility of NTS Transco and are covered within N 4.4. The references in the current Network Code to output nominations in N 4.2.2 ( c ) have therefore been deleted.	No change.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
UU041	UNC-TPD	N	4.2.2(c)		Please reinstate the wording "and require (in respect of LDZ Shrinkage) gas flows at NTS/LDZ Offtakes without incurring Overrun Charges under Section B" which have been deleted in error.	The Shrinkage Provider shall not be required to apply for NTS exit capacity and therefore shall not be exposed to any NTS exit capacity overruns. However the DN should hold NTS exit flat and flexibility capacity sufficient to cover aggregate flows (which will include those to cover downstream demand, stock change requirements and shrinkage gas requirements) at the NTS/DN interface. The overrun determination is defined in UNC TPD Section B 6.5 and 6.5.6 defines that no flat or flexibility overrun charge shall apply	No change.
STA009	UNC-TPD	N	4.2.3		Paragraph referring to the Shrinkage Provider applying for storage capacity has been deleted. STUK would seek clarification on why this has been deleted	The Shrinkage Provider accounts can only source gas at the NBP. The references to Storage are therefore confusing and redundant and have therefore been removed.	No change.
UU042	UNC-TPD	N	4.2.3		This paragraph was to be reworded rather than deleted to make clear that no Shrinkage Provider would be able to apply for Storage Capacity	The Network Code has been modified to ensure that the Shrinkage Provider can only purchase gas at the NBP. This principle has been upheld in the proposed legal drafting. We do not consider there is any merit in including text that mentions storage services or use thereof in this context and hence do not propose to change the drafting.	No change.
SSE124	UNC-TPD	N	4.4.3		Could Transco confirm that this is consistent with Sections E1.11.2 and H calculations?	Confirmed - these calculations have not changed as part of the DN Sales Process	No change.
SSE125	UNC-TPD	O	2.4		Change "Agreements" penultimate line to "Provisions"	Accepted	Drafting amended accordingly.
UU043	UNC-TPD	O	1.2.3(a)		Delete the word "Standard"	Accepted	Drafting amended accordingly.
NPow102	UNC-TPD	O	3.2.1 and 3.3.3		Why should Users provide this to the Transporter and not Transco 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.	Rejected. Disaggregated data provision required to enable each transporter to meet its separate licence requirements.	No change.
UU044	UNC-TPD	O	4.1 last line		"Insert "and" before "publish"	Accepted	Drafting amended accordingly.
SSE126	UNC-TPD	O	4.1(b)		last line insert "and" after "O"	Accepted	Drafting amended accordingly.
NPow103	UNC-TPD	O	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.	Rejected: requirement is the responsibility of transporter individually.	No change.

						Business Owner		
	Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
	NPow104	UNC-TPD	Q	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.	We do not consider it necessary. It is unlikely that we will have two concurrent but independent emergencies other than when the NEC was managing the situation in which case the NEC would be issuing instructions that would not conflict	No change.
	SSE128	UNC-TPD	Q	3.3		If only NTS should not be Total System and should refer to NTS System Entry Points. If reference is being made to Total System should be the Transporter giving instructions, not Transco NTS?	Rejected. Not inconsistent.	No change
	SSE127	UNC-TPD	Q	1.2.2		line 2 should reference to "a System" be the same as in 1.2.1 "Total System or a part of the Total System"	Rejected. Definition of Gas Supply Emergency captures issue.	No change.
	NPow105	UNC-TPD	Q	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	The compilation of these lists is a requirement of the licence and there is a common process established through the ASA but the maintenance of the list is an individual transporter responsibility. Therefore the text as drafted should remain.	No change.
	UU045	UNC-TPD	Q	1.6(a)		"Standard [6(17)]" should be replaced with "Standard Special Condition A8(17)"	Accepted	To be reflected in final drafting.
	NPow106	UNC-TPD	Q	1.6(b)		Replace "Transporter" with "Transporters" otherwise Shipper Users will face the prospect of different priority criteria applying to different networks which will increase fragmentation.	Although the criteria are established in principle by the Secretary of State, the UNC rule, as written, provides latitude for each transporter to finalise the list of Priority Consumers based on local criteria with Users of its network.	No change.
	SSE129	UNC-TPD	R	1.3.1		Replace Agreement line three with "Provisions"?	Accepted.	Drafting amended accordingly.
	STA010	UNC-TPD	R	1.5.1		STUK seek clarification from Transco on why paragraphs (c), (f), (g), (h), (i) and (k) have been deleted. These paragraphs relate to storage facilities and LNG Importation Facilities	The definitions are redundant.	No change.
	SSE130	UNC-TPD	R	1.9.1 and 1.9.2		Weren't these clauses to provide for circumstances where the DN is party to the SCA or NEA? We understood that references to Transco NTS would be amended.	Accepted: change "Transco NTS" to "Transporter"	Drafting amended accordingly.
	SSE132	UNC-TPD	S	1.11		If DNO Users excluded, how will DNO be billed for any energy imbalance arising from Shrinkage Provider activities?	Accepted; that was not the intention.	Drafting amended accordingly.
	UU046	UNC-TPD	S	1.11		The statement is not correct in the light of TPD J7.4.	Accepted.	Drafting amended accordingly.
	SSE131	UNC-TPD	S	1.4.2		Timing of invoices to be the same for all transporters and same Invoice Type	Yes, that is the intention.	No change
	NPow107	UNC-TPD	S	2.4.7		Should have sight of Operational Rules Governing the Supply of Invoice Charges via the Ad Hoc ProcessNeeds to be updated to account for DN Sales and made visible to Shippers	Available under Section 2.4.7 of Network Code (and Uniform Network Code)	No change
	NPow108	UNC-TPD	S	4.1.10		Should have sight of Invoice Query Estimation MethodologyNeeds to be updated to account for DN Sales and made visible to Shippers	Available under Section 4.1.10 of Network Code (and Uniform Network Code)	No change
	NPow109	UNC-TPD	S	4.1.8		Should have sight of Invoice Query MethodologyNeeds to be updated to account for DN Sales and made visible to Shippers	As defined in Section 4.1 of Network Code (and Uniform Network Code)	No change
	UU047	UNC-TPD	S	4.5.2 last line		"Annex - 2" should read "Annex S-2"	Accepted	Drafting amended accordingly.
	SSE133	UNC-TPD	S	4.6.3		Replace "are" line 2 with "is"	Accepted	Drafting amended accordingly.
	NPow110	UNC-TPD	S	4.7.1		Should have sight of Standards of Service Query Management Operational GuidelinesNeeds to be updated to account for DN Sales and made visible to Shippers	Available under Section 4.7.1 (a) of Network Code (and Uniform Network Code)	No change.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
STA011	UNC-TPD	S	4.7.3		The mechanics of how transporters in aggregate would pay amounts to users is missing here. STUK request Transco to provide further detail.	Noted.	No change to Section S. See V10.3.6
STA012	UNC-TPD	S	4.7.5		Same comments as 4.7.3 apply	Noted.	No change to Section S. See V10.3.6
EDF013	UNC-TPD	U	1.12		Two sections numbered 4.5.9 – incorrect section numbering	Accepted	Drafting amended accordingly.
SSE134	UNC-TPD	U	1.12		DNO Users are excluded, but will need UK Link User status to carry out Shrinkage Provider Activities - paragraph 5?	Noted; drafting will be amended.	Drafting amended accordingly.
SSE135	UNC-TPD	U	5		DNO needs to be a User for purposes of this paragraph Trading Between Users to carry out its activities as Shrinkage Provider	See SSE134.	No change
NPow111	UNC-TPD	U	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'	Unable to identify exact concern	No change.
EDF012	UNC-TPD	U	1.12 and 5.3.3		The sentence/grammar "In this Section U references to Users exclude DNO Users" does not make sense.	This phrase is consistent with other Sections in the UNC	No change.
NPow112	UNC-TPD	U	1.8.1		Should be 'Each Transporter' not 'The Transporter'	Accepted	Drafting amended accordingly.
NPow113	UNC-TPD	U	1.8.3		Should be 'a Transporter' not 'The Transporter'	Accepted	Drafting amended accordingly.
NPow114	UNC-TPD	U	2.2.2		'Transporter' should be 'Transporters'	Accepted	Drafting amended accordingly.
EDF014 & 015	UNC-TPD	U	4.5.9		Governing Law and Jurisdiction should be Section 7 and then two sub-sections 7.1 and 7.2. It does not form part of Section 6 which deals with Interest. Does there need to be reference in here that the central agency will undertake the managing of UK Link. Again I think this is covered as part of the GT licence condition though so is that sufficient?	Noted.	No change.
STA013	UNC-TPD	U	5.1.2		Transco NTS Activities will need to be re-titled to allow relevant transporters activities to be defined also, so that it applies not only to Transco NTS	References not understood.	No action.
NPow115	UNC-TPD	U	5.3.3		There is no Section B 1.5.1 (the current reference) nor V 1.5.1 (the previous reference)	Accepted.	References corrected in drafting.
NPow116	UNC-TPD	U	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	Noted, see TPD V6.5.3.	No action.
SSE136	UNC-TPD	U	8.4.5(c) and 8.4.6 and 8.4.7 and 8.4.9(a)		Insert "Uniform" before Network Code Committee	Accepted.	Drafting amended accordingly.
SSE137	UNC-TPD	U	8.4.6		Capitalise "panel majority"?	Accepted.	Drafting amended accordingly.
SSE138	UNC-TPD	U	Annex U-1 1.1		Replace "Network Code" with "Transportation"	Noted. We intend to replace "Network Code Principal Document" with "Uniform Network Code"	Drafting amended accordingly.
SSE139	UNC-TPD	V	1.3		Amend references to "Network Code"	Accepted	Drafting amended accordingly.
SSE144	UNC-TPD	V	2.4		a) [Does] this permits establishment of multiple accounts under the same shipper's licence? b) Does this prevent the DN from appointing another party that is already a User as Shrinkage Provider? Section N	a) No b) No N4.1.3 and 4.1.4 provide.	No change.
NPow117	UNC-TPD	V	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.	We would like to see example of where such confusion could arise as Transco believe adequate demarcations exist	No change.
NPow118	UNC-TPD	V	5.9		The title of this clause is no longer appropriate following the deletion of what was Annex 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.	Do not believe text should change - title for Annex V-1 is fine. 5.9.2 qualifies the timing point.	No change.
UU141	UNC-TPD	V	13.9		"9(3) Approval" should read "A11(18) Approval"	Accepted.	Drafting amended accordingly.
NPow119	UNC-TPD	V	14.2		Remove foot note	Agreed	Drafting amended accordingly.
NPow120	UNC-TPD	V	1.3 and 1.3.1		Missing Uniform from in front of Network Code	Accepted	Drafting amended accordingly.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
SSE140	UNC-TPD	V	1.3.7		How does this cover Scottish DN as party to the Moffat Ancillary Agreement/s?	Scottish DN does not have to be a party to the Moffat CSEP Ancillary Agreement. The novated contract with PTL will allow gas bound for Stranraer to be oftaken at this point. The references to Transco are there to add context to the Stranraer arrangement and, hence, can be construed as Scotland DN, given where the obligations lie in Scotland DN's licence. Dealt with by rule in Transition Document.	No change.
NPow121	UNC-TPD	V	1.4 and 1.5		Not Used has been deleted elsewhere and should be done so here too	Accepted	Drafting amended accordingly.
NPow122	UNC-TPD	V	12.2.1		Missing Uniform in front Network towards end of sentence	Accepted	Drafting amended accordingly.
SSE154	UNC-TPD	V	12.2.1		Last line: insert "Uniform"	Accepted.	Drafting amended accordingly.
UU139	UNC-TPD	V	12.3.1		"9(3) Approval" should read "A11(18) Approval"	Accepted.	Drafting amended accordingly.
SSE155	UNC-TPD	V	12.4.		Check references to Network Code Operations Reporting Manual	Reference unclear.	No change.
NPow123	UNC-TPD	V	12.4.5		replace "to increase" with "to change". Delete (d) as not used	Rejected - reflects current NwC text.	No change.
SSE156	UNC-TPD	V	13.3.1		Last line: insert "are" before "payable"	Accepted	Drafting amended accordingly.
NPow124	UNC-TPD	V	14.4 to 14.10		Delete as not used	Accepted	Drafting amended accordingly.
SSE141	UNC-TPD	V	2.1.2(a)(v)		Is this how the DNO would set up its Shrinkage Provider User accounts?	Yes, although this needs to be done for hive-down: implementation underway	No change.
NPow125	UNC-TPD	V	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	Accepted	Drafting amended accordingly.
SSE142	UNC-TPD	V	2.1.2(b)		Does this include the DNO acting under shipper licence exemption?	Yes.	No change.
SSE143	UNC-TPD	V	2.1.2(d) and 2.1.5		Is this OK for DN in capacity as Shrinkage Provider?	We believe that the excluded provisions are appropriate when a DN becomes a DNO User for the purposes of being a Shrinkage Provider	No change.
UU140	UNC-TPD	V	2.8.3		delete redundant "(d)"	Accepted.	Drafting amended accordingly.
NPow126	UNC-TPD	V	3 generally		Missing Uniform from in front of Code Credit Limits	The Credit Limits apply in respect of each Transporter's Code and therefore should "Code Credit Limit" should not be prefixed with "Uniform"	No change.
NPow127	UNC-TPD	V	4.2.2(d) and (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 bDefinition of NTS Code?	User cannot cease shipping on NTS if it is still shipping on an LDZ.	No change.
MGN007	UNC-TPD	V	4.2.2(g)		Insert "by" after bound	Accepted	Drafting amended accordingly.
SSE145	UNC-TPD	V	4.2.2(g)		Insert "by" after "bound"	Accepted	Drafting amended accordingly.
UU048	UNC-TPD	V	4.2.2(g)		Insert the word "to" after the word "bound"	Accepted	Drafting amended accordingly.
MGN008	UNC-TPD	V	5.3.3		Remove []	Accepted	Drafting amended accordingly.
UU049	UNC-TPD	V	5.5.2(d)		Reference to the Code includes the OAD so there is no need to reference the OAD separately	Accepted	Drafting amended accordingly.
NPow128	UNC-TPD	V	5.5.3(i)		This should be deleted but if not the same condition should apply to Shipper Users in 5.2	This has been inserted at the request of a particular buyer in view of its business model.	No action.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
SSE146	UNC-TPD	V	5.5.3(i)		Note this new clause in square brackets re disclosure to a contractor of the Transporter where the contractor has entered into a confidentiality agreement no less onerous than terms of this para 5	Noted.	No change other than removal of square brackets.
SSE147	UNC-TPD	V	6.1.5		Don't understand why 6.4 doesn't apply to DNO User appointing User Agent. Could Transco please clarify?	Reference changed.	Reference changed.
UU050	UNC-TPD	V	6.1.5		We believe the cross reference to 6.4 should be to 6.5.	Accepted	Drafting amended accordingly.
NPow129	UNC-TPD	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 .	Note against all comments on 6.5.2: this scope is intended to give a high level overview of the scope of the Transporters' Agent and consequently does not list all the activities described in the ASA, for example, Billing Ops Forum & RbD - captured by Billing role Provision of Data - captured by Supply Point Register	No change arising from the response. Duplication of reference 6.5.2 removed.
SSE148	UNC-TPD	V	6.5.2		Line 3 - thought "on behalf of the Transporters" was to be deleted? Line 4 Transporters'	Accepted.	Drafting amended accordingly.
NPow130	UNC-TPD	V	6.5.2 (1st 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	In general, non UNC service lines have not been specified in the scope Recording and calculation of transporter performance and payments due in relation to Standards of Service - Licence Compiling a Priority Consumer list as per Q.1.6 - Supply Point Register (RFI?) Bureau Services - Licence C&D Obligations - Legislation SLC 17 - Licence SRVs and USRVs - Billing	No change arising from the response. Duplication of reference 6.5.2 removed.
NPow131	UNC-TPD	V	6.5.2 (1st occurrence)		There is an obligation in the ASA which should be covered in this section: The calculation and recording of transportation volumes and quantities	This activity is covered in the overall task of billing	No change arising from the response. Duplication of reference 6.5.2 removed.
NPow132	UNC-TPD	V	6.5.2 (1st occurrence)		This section must include an obligation to provide both Operational & Invoicing query service in accordance with Section S	This activity is covered in the overall task of billing	No change arising from the response. Duplication of reference 6.5.2 removed.
NPow133	UNC-TPD	V	6.5.2 (1st occurrence)		General - responsibilities of Agency- provision of DM reading? Refer to Action Log No 259	This activity is covered in the overall task of meter reading validation	No change arising from the response. Duplication of reference 6.5.2 removed.
NPow134	UNC-TPD	V	6.5.2 (2nd 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".	We consider the drafting to be robust.	No change..
NPow135	UNC-TPD	V	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)	Drafting has been amended to remove the issue.	Drafting amended accordingly. Duplication of reference 6.5.2 removed.
SSE149	UNC-TPD	V	6.5.3		This was taken out in previous version of legal draft and has been put back in?	The provision should remain.	No change.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to TPD
SSE150	UNC-TPD	V	6.5.5		We note new clause relating to the Transporter Agency dealing with computer equipment etc.	Noted.	No change.
UU051	UNC-TPD	V	7.1.1(b)		Is it correct to include this given the position of non Transco DNs?	We believe that the drafting is correct.	No change.
SSE152	UNC-TPD	V	7.1.2 (a)(iii) and 7.2.1 and 7.2.2		Could Transco confirm that this seems to permit multiple Transporter User accounts for Shrinkage Providers? Could an Agent access these accounts?	Transco NTS manages a number of Restricted User accounts. Each Shrinkage Provider (Licensed entity) will have a User account for shrinkage purposes. An Agent could be appointed to manage this account.	No change.
UU138	UNC-TPD	V	7.2.1(b)		delete redundant "the" before "Transporter"	Accepted.	Drafting amended accordingly.
SSE151	UNC-TPD	V	7.2.1(b)		Remove "the " in last line	Accepted	Drafting amended accordingly.
NPow136	UNC-TPD	V	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.	We believe drafting is clear.	No change.
SSE153	UNC-TPD	V	8.2.6		Could Transco please clarify why this clause has been inserted?	To cater for the situation where a User is not a party to a framework agreement with one or more Transporters.	Additional drafting inserted to clarify application.
SSE157	UNC-TPD	X	1.2.2		3rd last line: insert "Uniform"	Accepted.	Drafting amended accordingly.
UU052	UNC-TPD	X	1.2.2 line 6		Insert "Uniform" before "Network Code Committee"	Accepted	Drafting amended accordingly.
UU053	UNC-TPD	X	2.10.12		Typo in "should" in penultimate line	Accepted.	Drafting amended accordingly.
SSE158	UNC-TPD	Z	2.6.5		typo line 1 "accordance"	Accepted	Drafting amended accordingly.
SSE159	UNC-TPD	Z	5.10.2(b)(l)		capital 'U' for "user"	Accepted	Drafting amended accordingly.