

UNC Response File (General Terms)						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to General Terms.
SSE193	General Terms	A	1.1.2		Remove square brackets around 'or any Supplemental Agreement'	Accepted	Drafting amended accordingly.
UU130	General Terms	A	1.1.2		We are not convinced that it is appropriate to refer to the Supplemental Agreement here.	Supplemental Agreements exist under the Offtake Arrangements Document and therefore the reference should remain.	No change.
NPow001	General Terms	A	1.1.2(b)		Question: What is a "Supplemental Agreement"?	See OAD B1.5	No change.
SSE196	General Terms	A	2.1		How will experts be appointed for First Day of UNC? Will the Network Code ones be deemed to have been appointed? Suggest use similar approach in Transition Document to Part IV 1.3.	Transitional rules will carry current experts across.	No change.
SSE194	General Terms	A	1.5.1		Why is User explicitly included, but Transporter included only by implication (via the defined term Party)	We believe that the drafting defines the terms adequately.	No change.
SSE195	General Terms	A	1.6.1		the appointment of a disputes secretary is not covered in the JGAA. How will this be done?	This will be covered by Schedule 5 para 2.21 of the JGAA.	No action.
SSE198	General Terms	B	1.3		needs to make clear how DN Users will become Users of NTS code - presumably via the Transporters' Framework Agreement.	DNOs will accede to Transco's Network Code by signing a Transporters Framework Agreement; B1.5.1(b) details.	No action.
SSE207	General Terms	B	11		throughout, check use of "Communications" in Offtake Communications Document	Carried out.	Consequential drafting changes made.
EON020	General Terms	B	1.2.1		This clause is particularly frightening. It appears that this clause will allow each DNO to carve out terms so that they are not incorporated in to the code. This could facilitate inefficient fragmentation of market rules. We would like to fully understand the implications of this clause. Will there be any clauses that transporters will not be incorporated in their individual codes, and what is the intention to facilitate the further 'carving-out' of terms in future? Shippers need appropriate assurances from Transco and DNOs on this. We understand that all codes will be subject to the UNC modification rules as this offers the only structural safeguard against inadvertent inefficient fragmentation, Transco needs to demonstrate through a line by line review of the UNC that this is categorically the case and that no loopholes exist.	Each Transporter's Network Code will be given effect via a Framework Agreement. Initially each Transporter's Network Code will incorporate all of the terms of the initial UNC. Any changes from this position, for any Transporter's Network Code, will require a Modification Proposal and associated process governed by the Modification Rules. Any divergence of Transporters' Network Codes could only take place after Ofgem direction on such a proposal.	No action.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to General Terms.
SGD016	General Terms	B	1.2.1		The use of the term "Code" to refer to the UNC and/or the UNC and short form codes themselves or together (we are not always clear which) needs better definition. Some of the muddle is created by allowing for an overly flexible regime to allow some parts of the Code to be expressed in terms of not being part of the code and yet others can be incorporated into the Code of individual transporters only. To remove the complexity, we would recommend that much simpler drafting is introduced and that if circumstances arise which requires this type of change, that it is introduced at that later stage.	Each Transporter's Network Code will be given effect via a Framework Agreement. Initially each Transporter's Network Code will incorporate all of the terms of the initial UNC. Any changes from this position, for any Transporter's Network Code, will require a Modification Proposal and associated process governed by the Modification Rules. Any divergence of Transporters' Network Codes could only take place after Ofgem direction on such a proposal.	No action.
EDF017	General Terms	B	1.2.1		Implies that the Transporter's network code could have terms that are expressed as not being part of the code and as such would not be subject to the governance of the code. We are not sure if this flexibility for each individual GT code to be altered was intentional but needs reviewing may lead to unnecessary complexities later on. We are concerned that individual Transporter's network codes could diverge, something that we would not support.	Each Transporter's Network Code will be given effect via a Framework Agreement. Initially each Transporter's Network Code will incorporate all of the terms of the initial UNC. Any changes from this position, for any Transporter's Network Code, will require a Modification Proposal and associated process governed by the Modification Rules. Any divergence of Transporters' Network Codes could only take place after Ofgem direction on such a proposal.	No action.
TOT005	General Terms	B	1.2.1		The wording of this paragraph appears to allow the network code of an individual Transporter to vary from the Uniform Network Code to the extent parts of the UNC may not apply and/or additional terms may be added. Regardless of this we would like confirmation that any proposals to disapply areas of the UNC and/or add additional terms will be controlled through the normal Modification Rules processes subject to paragraph 1.2 of the UNC Modification Rules.	Each Transporter's Network Code will be given effect via a Framework Agreement. Initially each Transporter's Network Code will incorporate all of the terms of the initial UNC. Any changes from this position, for any Transporter's Network Code, will require a Modification Proposal and associated process governed by the Modification Rules. Any divergence of Transporter's Network Codes could only take place after Ofgem direction on such a proposal.	No action.
MGN048	General Terms	B	1.2.3		Insert A11 in square brackets	Accepted.	Drafting amended accordingly.
NPow002	General Terms	B	1.2.3		Transco has a single code network code to cover its capacity as both NTS and DNO - this seems inconsistent with references elsewhere in the Code to "Transco's NTS Code"	Drafting has been amended to clarify.	Drafting amended accordingly.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to General Terms.
SSE197	General Terms	B	1.2.3		empty square brackets Transco to have a single network code in capacity as NTS and DNO. Does this sit OK with 2.1.2(b) which says that Transco NTS and Transco as DNO shall be considered separate Transporters?	Drafting has been amended to clarify.	Drafting amended accordingly.
SSE199	General Terms	B	1.3.1(a) and 2.3.3(a)(i)		Shippers' Framework Agreement	Not a possessive usage.	No change
SSE200	General Terms	B	1.3.1(b) and 2.3.3(a)(ii)		Transporters' Framework Agreement	Not a possessive usage.	No change
SSE205	General Terms	B	11.1.1		Note Offtake Code Communications Document referenced here	Noted.	No change.
MGN053	General Terms	B	11.1.1(b)		Delete "by the"	Accepted.	Drafting amended accordingly.
UU134	General Terms	B	11.1.1(b)		Delete redundant "by the " at the end of this paragraph	Accepted.	Drafting amended accordingly.
SSE206	General Terms	B	11.1.1(b)		- delete the words 'by the' at the end of the sentence; delete the comma and insert a semi-colon.	Accepted.	Drafting amended accordingly.
MGN054	General Terms	B	11.1.6(b)		Clause incomplete	Accepted. Cross-refer to OAD.	Drafting amended accordingly.
SSE208	General Terms	B	11.1.6(b)		delete the square brackets. Which Offtake Communications are exempt from 11.1.5?	Accepted: now completed.	Drafting amended accordingly.
NPow003	General Terms	B	11.1.6(b)		There are no 'Offtake Communications' following on from this clause	Accepted: now completed.	Drafting amended accordingly.
SSE209	General Terms	B	11.3.6		Note new clause	Noted.	No change
SSE210	General Terms	B	14.7.		Are we happy with this clause? Link to TPD V.8.2.5	Link to 8.2.5 not needed because relevant shippers are in contract with relevant transporters	No change
SSE211	General Terms	B	14.9.1		delete the square brackets from first line.	Accepted.	Drafting amended accordingly.
SSE203	General Terms	B	2.1.1(b)		Does the clause need to refer to DNO as "owner or operator"?	The phrase "owner or operator" is used to cover all eventualities where operation and ownership are not contained within the same entity	No change
NPow004	General Terms	B	2.1.3		First use of 'of' on last line is incorrect - should be "or"	Accepted.	Drafting amended accordingly.
SSE201	General Terms	B	2.1.3		Should address concerns regarding clarification required for Sections G and M with regard to Transporter and Supply Point activities	Believe existing drafting is sufficient to capture the point. No change proposed	No change
SGD017	General Terms	B	2.2.1		We repeat our views about the introduction of terms with "User" used twice is likely to create ongoing confusion and inefficiencies.	We believe that the drafting convention adopted should minimise any confusion that could have arisen with the introduction of Transporters into the network code as "special" users.	No change
UU131	General Terms	B	2.2.1(b)		Should "network" read "Distribution Network"? Insert closing brackets at the end.	Accepted.	Drafting amended accordingly.
MGN049	General Terms	B	2.2.1(b)		) missing	Accepted.	Drafting amended accordingly.
SSE202	General Terms	B	2.2.2		this conflicts with the Mod Rules, where a DNO User is included in the definition of a Transporter. Should say 'Without prejudice to the Modification Rules' or some such.	Comment not understood.	No change.

						Business Owner	
Index No.	Document	Section	Section #	Para	Response/Issue	NGT response	Proposed changes to General Terms.
MGN050	General Terms	B	2.2.3(b)		Insert "the" before System	Accepted.	Drafting amended accordingly.
UU132	General Terms	B	2.2.3(b)		Insert "the" before "downstream"	Accepted.	Drafting amended accordingly.
MGN051	General Terms	B	2.4.1		Incorrect cross –reference, replace 1.5.1 with 2.4.1	Accepted.	Drafting amended accordingly.
SSE204	General Terms	B	2.4.1		Reference after (c) should be to 'this paragraph 2.4.1'.	Accepted.	Drafting amended accordingly.
MGN052	General Terms	B	9.1.3		Use of brackets and stray square brackets?	Accepted.	Drafting amended accordingly.
UU133	General Terms	B	9.1.3(c)		We did not see how anything would be relevant here.	Appropriate text now added.	Drafting amended accordingly.
UU135	General Terms	C	1		definition of "UNC Implementation Date" needs to be moved into correct alphabetical order	Accepted.	Drafting amended accordingly.
NPow005	General Terms	C	1		'Date of Code' - no date given'Distribution network' no Special Condition reference defined'Standard Condition' - definition missing	Accepted: now rectified.	Drafting amended accordingly.
SSE215	General Terms	C	2.8		remove square brackets	Retained for now.	To be removed in final version.
SSE213	General Terms	C	2.4.5		Could Transco confirm that the intent of this clause is that OPNs submitted to NTS via OAD by DNs reflect anticipated flows of gas at LDZ System Points and will be taken account of by NTS when determining whether or not a Transportation Constraint exists.	The intent of the drafting in UNC TPD J 4.6 is to ensure that offtake flows match with OPNs. Thus the reference in UNC General Terms Section C indicates that the NTS will use such information in determining whether a Transportation Constraint exists	No change
MGN055	General Terms	C	2.4.5		No definition of Incremental Exit Capacity Release Statement has been provided Clarification – is it correct that a transportation constraint can occur on the NTS?	Yes, a transportation constraint can occur anywhere on a System.	No change
SSE214	General Terms	C	2.6.3		Check against TPD H.1.1.3	Transco believes that the demand definitions are fine.	No change.
SSE216	General Terms	C	2.9.1		remove reference to TPD section T. Replace with GT section A.	Accepted.	Drafting amended accordingly.
UU136	General Terms	C	2.9.1(a)		Section T (disputes) is now GT Section A	Accepted.	Drafting amended accordingly.
UU137	General Terms	C	2.9.4		"Special Standard Condition" should read "Standard Special Condition" (appears twice)	Accepted.	Drafting amended accordingly.
SSE217	General Terms	C	2.9.6		Latest position on review in context of interim exit arrangements?	Reviewed accordingly.	Drafting reflects current position. Footnote removed.
UU138	General Terms	C	7.2.1(b)		delete redundant "the" before "Transporter"	Accepted.	Drafting amended accordingly.
SSE212	General Terms	C	general comment		There are many redundant square brackets in this section. Not all are listed below and the section should be checked generally.1.1	Section reviewed.	Redundant square brackets removed.