

Respondent details		NGN			
No.	Condition number / RIIO tracking number	Condition name	Page/Paragraph Ref	Comments	Suggested alternative drafting (please use tracked changes wherever possible)
	GDC 9	Innovation Roll Out Mechanism	9.6 (b)	Delete “electricity consumers” and replace with “gas consumers”. It may be preferable to have this more generically as customers rather than fuel specific./	
	GDC 24	Broad Measure of Customer Satisfaction	50 para 4.	It-1 and It-2 need to be defined	
	GDC 25	Shrinkage & Leakage	61-62	The draft is inconsistent with the enduring/non-enduring calculations in the consultation	
	GDC 24	Shrinkage & Leakage	64 para 25.16 (b)	Cross reference to para 25.7 – not relevant	Change to 25.17
	GDC 24	Shrinkage & Leakage	64 para 25.17 (b)	Cross reference to para 25.5 – not relevant	Change to 25.15
	GDC 24	Shrinkage & Leakage	65 para 25.20 and 25.22	Cross reference to para 25.11 – not relevant	Change to 25.9
	GDC 28	Recovery of uncertain costs	107, 28.19	This refers to directing special conditions only. The connection charge boundary is defined in the statement issued under standard condition 4B.	Replace “special” with “relevant”
	GDC 28	Recovery of uncertain costs	110, 28.36	The definition of fuel poor network extensions scheme definition is too precise. Whole communities can be designated as fuel poor which therefore means that some individuals who are not fuel poverty but live in those communities are covered by this scheme.	Replace “in fuel poverty” with “eligible to receive a fuel poor voucher in accordance with the guidance set out in the connection charging methodology statement issued under condition 4B”.

	GDC 31	Excluded services	31.2	<p>In this new condition a 2 stage test is introduced for something being an excluded service, that it conforms to the general principle and then is one the listed activities (para 31.2). The description of the general principle simply states that it is not a service for which charges are levied under GDC 20. This is somewhat circular as they are excluded from GDC20 to the extent they are an excluded service! Additionally there is always the risk that someone puts a UNC mod in to bring them within Code and then the charging statement which is now under code process such that whilst they still might be one of the listed services under para 31.10 of the condition they no longer meet the general principle and thus fail the test. I'm not sure what the introduction of this general principle adds (particularly as it is circular), in simple terms if they are captured on the list they should be excluded from the ambit of GDC20 and as such excluded.</p> <p>There is a save all provision in that the authority can direct any service be treated as excluded (para 31.11 but to me the introduction of the general principle is not required and introduces a risk that something we currently think could be excluded can fail the two stage test and thus revenues fall back into GDC20. Not sure that is what is intended.</p>	
	GDC 32	Tariff Capped Metering services	32.6 (a)	This should refer to "licensee" rather than "relevant supplier"	Amend as proposed
	GDC 32	Tariff Capped Metering services	32.6 (b)	We do not understand the meaning or intent of this. Please clarify.	
	GDC 48	DRS	71 para 48.6	It-1 and It-2 need to be defined	
	GDC74	RIGs	76.17	Final proposals is defined but not used in the condition	delete

