From: Gethyn.Howard@bu-uk.co.uk [mailto:Gethyn.Howard@bu-uk.co.uk]
Sent: 02 November 2016 12:05
To: Rebecca Pickett
Cc: Rupika Madhura
Subject: SSCA15A Consultation

Good afternoon Rebecca,

Having reviewed the licence condition, we wanted to provide the below comments informally in case this required any changes to be made to the licence during the consultation.

Though A15A does not apply directly to IGTs and the direct obligations on "Relevant Gas Transporters" would not therefore capture IGTs, the definition may under Part B paragraph 7(a) have unintended consequences. This is as the current definition of Relevant Gas Transporters is defined as the licensee along with "other gas transporters" which would capture IGTs. Under Part B paragraph 7(a) therefore, the drafting would require the CDSP to be jointly owned with the IGTs as IGTs would be captured by the "Relevant Gas transporter" definition.

To address this we would suggest removing the reference to ("Relevant Gas Transporters") in paragraph 3 of SSCA15A and defining Relevant Gas Transporters perhaps in a miscellaneous section at the end of the condition as used previously for example in SLC9, paragraph 21: *In this condition* "*relevant gas transporter*" shall mean the holder of a GT licence, for whom this condition is in effect.

I trust this makes sense but am more than happy to discuss further.

## Kind regards

Gethyn Howard Regulatory Affairs Manager

## **BUUK Infrastructure**

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Thank you