

GT SECTOR	
REFERENCE NUMBER:	CATEGORY:
LICENCE CONDITION NUMBER: <i>(if relevant):</i>	SpC 9.10
TITLE:	Long Term Network Planning
RELEVANT LICENCE CONSULTATION QUESTIONS <i>(if any):</i>	Q27 – captured under generic question on views of the proposals for changes to GT licence
RELEVANT ISSUES LOG:	9.10-9.12 - 7A-7C - Network Plan, Tx Code, Network Model Issues Log
POLICY ISSUES	
<ul style="list-style-type: none"> • Definition of Entry and Exit Zones • Levels of Network Capability from commercial tools • Provide a copy of the LTDS by the 1 October to the Authority 	<ul style="list-style-type: none"> • 9.10.10a refers to reporting by “Entry and Exit Zones”. The definition of these allows for NG to propose changes and the Authority to approve these. No detail is provided of the mechanics of this change process, timing etc.. • 9.10.10c – requires us to "as far as practicable" to report on the level of Network Capability that can be delivered using commercial tools. We have previously highlighted "The reference to commercial tools here needs to be framed meaningfully. Either by reference to commercial arrangements that the licensee has in place and / or by reference to commercial arrangements where a cost has been revealed through a tender process. See below for suggested drafting to address this point. • 9.10.5. It would only be possible to provide a draft document for the 1 October to the Authority with the exit process numbers still being finalised. This date should be changed to “by 31st December”
DRAFTING ISSUES	
<ul style="list-style-type: none"> • 9.10.4(a) • 9.10.4(b) • 9.10.5(a) 	<ul style="list-style-type: none"> • It seems that the words from “together with” to “9.10.5(b)” are now superfluous and can be deleted. It seems that this reference to other facilities was perhaps to LNG facilities which the condition now no longer refers to; the current provisions in 7A(6) and (7) having been removed. • Should cross refer to 9.10.4(a) but reference to facilities can be removed if the previous point is accepted.

<ul style="list-style-type: none"> • 9.10.5(c) • 9.10.9 • 9.10.10(c) • 9.10.10(d) 	<ul style="list-style-type: none"> • See comments above re timing submission. We suggest the 1 October date is change to “by 31st December” • 9.10.5(c) should reflect the provisions of the current 7A.3(c) and so read “prepare a version of each Long Term Development Statement which excludes so far as is practicable any such matter as is mentioned in paragraph 9.10.6 and send a copy to any person....” • Add at the end of 9.10.9 “or such other date as the Authority may direct” • This provision needs to be framed meaningfully by reference to tools currently available to the licensee or where the potential cost of such has been revealed to the licensee. We suggest “....that can economically and efficiently be delivered using commercial tools (either that the licensee has in place or where the potential costs of such commercial tools have been revealed to the licensee through a tender process) for each of these Entry and Exit Zones”. • It is suggested that the words beginning “a view of the required level...” are dropped into a separate sub-paragraph e.
FINANCE ISSUES	
SUPPORTING INFORMATION	
OFGEM ENGAGEMENT:	Discussed at previous LDWG and log available