

GT SECTOR	
REFERENCE NUMBER:	CATEGORY:
LICENCE CONDITION NUMBER: <i>(if relevant):</i>	SSC A8
TITLE:	Emergency Services and Enquiry Service Obligations
RELEVANT LICENCE CONSULTATION QUESTIONS <i>(if any):</i>	
RELEVANT ISSUES LOG:	
POLICY ISSUES	
<ul style="list-style-type: none"> • 	<p>Ofgem's SSMD stated that it proposed to align the GT emergency service obligation with that set out in the electricity DN licence. Ofgem stated at paragraph 2.124 of the SSMD Gas Transmission document that it would consult on the proposal. We are not aware that Ofgem has conducted such a consultation on the proposal.</p> <p>The October 2019 LDWG issue log captures the key concern with the proposal: <i>It may be impossible to provide Emergency Enquiry Services at all times given the telephony service is provided for by a third party. There is a concern that if the telephony service goes out as a result of third party issues then the network companies would be in breach of licence.</i></p> <p>Ofgem's response in the issue log is as follows: <i>We would expect licensees to do their best to ensure the service is available at all times. If there was a failure, before taking any enforcement action we would apply our enforcement guidelines, which include a commitment to act in a proportional way.</i></p> <p>We would welcome transparent clarification from Ofgem that this would be its intended approach to the operation of this condition if it intends to proceed with this licence modification.</p>
DRAFTING ISSUES	
<ul style="list-style-type: none"> • A8.3 	<ul style="list-style-type: none"> • Please see our comments above on the proposed policy.
FINANCE ISSUES	

SUPPORTING INFORMATION	
OFGEM ENGAGEMENT:	