

GT SECTOR	
<b>REFERENCE NUMBER:</b>	<b>CATEGORY:</b>
<b>LICENCE CONDITION NUMBER:</b> <i>(if relevant):</i>	SpC 9.19
<b>TITLE:</b>	System Management Services
<b>RELEVANT LICENCE CONSULTATION QUESTIONS</b> <i>(if any):</i>	<b>Q27 – captured under generic question on views of the proposals for changes to GT licence</b>
<b>RELEVANT ISSUES LOG:</b>	<b>Gas Transmission Issue Logs_9.19 - 8A - System Management Services Issues Log</b>
<b>POLICY ISSUES</b>	
<ul style="list-style-type: none"> <li>Reasonable endeavours changed to must comply</li> </ul>	<ul style="list-style-type: none"> <li>9.19.9 – the existing “reasonable endeavours “ provision has been changed to “must comply”. The rationale for this proposed change is not clear and has not been consulted on.</li> </ul>
<b>DRAFTING ISSUES</b>	
<ul style="list-style-type: none"> <li>Defined Terms</li> <li>9.19.9</li> <li>9.19.22(c)</li> <li>9.19.27</li> <li>9.19.28</li> </ul>	<ul style="list-style-type: none"> <li>“NTS” is not defined in the GT definitions annex but “National Transmission System” is. Suggest that definition has (NTS) added to it.</li> <li>Drafting should be amended to reflect existing provisions so as to read “The licensee must use reasonable endeavours to comply...”</li> <li>For consistency with 9.19.15(c) and other similar provisions in the GT licence, the report at 9.19.22(c) should contain representations that were made but not withdrawn. Therefore add “that were not withdrawn” after “licensee” in line 3.</li> <li>9.19.27 should begin with “Unless the Authority otherwise directs, the licensee must...” This existing wording provides potential for flexibility without a licence change. It has been removed with no justification or consultation so we would request that it is reinserted to provide the current potential flexibility.</li> <li>As drafted 9.19.28 is deficient as it only provides for the licensee to request a derogation and not for the Authority to either grant or be able to grant such a derogation. An additional paragraph needs to be added along the lines of the existing 8A.32 (and the approach taken in the drafting at 9.22.12).</li> </ul>

FINANCE ISSUES	
SUPPORTING INFORMATION	
OFGEM ENGAGEMENT:	LDWG meetings