

GT SECTOR	
<b>REFERENCE NUMBER:</b>	<b>CATEGORY:</b>
<b>LICENCE CONDITION NUMBER:</b> <i>(if relevant):</i>	SpC 3.10
<b>TITLE:</b>	King's Lynn subsidence Re-opener and Price Control Deliverable
<b>RELEVANT LICENCE CONSULTATION QUESTIONS</b> <i>(if any):</i>	Q27 – captured under generic question on views of the proposals for changes to GT licence
<b>RELEVANT ISSUES LOG:</b>	Gas Transmission Issue Logs_3.10 Kings Lynn Subsidence Issues Log
<b>POLICY ISSUES</b>	
<ul style="list-style-type: none"> <li>Delivery dates</li> </ul>	<ul style="list-style-type: none"> <li>Please see our response to consultation questions 20 and 21 relating to points applicable to PCDs and reopeners</li> <li>There is no ability to request a change in delivery date under 3.10.6 unless clauses 3.10.6a) or b) are met. There may be occasions in which it would be in the interests of consumers to amend this date (where these triggers are not met).</li> <li>3.10.8 – as set out in our draft determination response (GT_Q3) it is important that Ofgem respond to reopener decisions by the proposed dates highlighted to Ofgem. Failure to do so may result in additional costs being incurred and project delays which should not be borne by the licensee if they have delivered to the agreed timescales. Propose that within this clause Ofgem sets out provisions for changes to subsequent reopener dates and increases of allowances for additional costs incurred if projects are delayed as a result of deferred decision making.</li> </ul>
<b>DRAFTING ISSUES</b>	
<ul style="list-style-type: none"> <li>Referencing</li> <li>Changes if work is not to be progressed?</li> <li>Headings</li> </ul>	<ul style="list-style-type: none"> <li>3.10.10 reference to BTRRt should be KLSRt</li> <li>3.10.13 reference to CEPRT should be KLSRt</li> <li>As 3.10.6 contemplates the amendment of outputs etc. In Appendix 1, it is not clear what would be requested if , under 3.10.6(b) the licensee did not intend to proceed. In such a case would the request be to amend the Appendix to reflect no output and zero allowances? Please could Ofgem clarify.</li> <li>Headings should be framed as statements not questions. Part B heading should read “What the licensee is funded to deliver” and art E heading should read “Authority process for making a direction”</li> </ul>

<ul style="list-style-type: none"> <li>• 3.10.6</li> <li>• 3.10.8(c)</li> <li>• FEED definition</li> </ul>	<ul style="list-style-type: none"> <li>• As referred to above we believe this paragraph should make provision for a reopener to request delivery date changes where the additional funding request might not be triggered</li> <li>• Insert “in Appendix 1” after “allowances” at the end of the sentence.</li> <li>• Should refer to “tendered quote” rather than “fixed bid quote”</li> </ul>
<b>FINANCE ISSUES</b>	
<b>SUPPORTING INFORMATION</b>	
<b>OFGEM ENGAGEMENT:</b>	LDWG