

GT SECTOR	
REFERENCE NUMBER:	CATEGORY:
LICENCE CONDITION NUMBER: <i>(if relevant):</i>	SpC 9.15
TITLE:	NTS Shortfall Contribution Obligations
RELEVANT LICENCE CONSULTATION QUESTIONS <i>(if any):</i>	
RELEVANT ISSUES LOG:	
POLICY ISSUES	
DRAFTING ISSUES	
<ul style="list-style-type: none"> • Definitions • Definitions • Definitions • Cross references • Removal of existing paragraph 11D(8) 	<ul style="list-style-type: none"> • We note “Licensed Activity” is yet to be defined. We suggest this could be done by reference to the definition of “transportation business” in SSCA3. • The GT definition annex should refer to “Shortfall <u>Direction</u>”. • The definitions of “Shortfall Payment Recipients” and “Permitted Administration Fee” should refer to Special Condition 9.15 and its revised title. • As the existing provisions of SpC 11D(4) have been split into 2 paragraphs (9.15.4 and 9.15.5) there are some knock-on cross reference issues to address. <ul style="list-style-type: none"> ○ 9.15.7: references to 9.15.5 in lines 1 and 5 should be to 9.15.6 ○ 9.15.8: reference to 9.15.5 in line 2 should be to 9.15.6. ○ 9.15.9: references to 9.15.5 in line 3 and in paragraphs b, c and d should be to 9.15.6. • In the issue log we stated: “We see no reason to delete the existing drafting so our preference would be to retain XX.8 in its current form for consistency. We see no reason for this non-essential housekeeping change to be

	<p><i>progressed as part of RIIO-2.” In response Ofgem has stated “Improving the clarity of the licence is part of the RIIO-2 licence process as the change helps achieve this”. We do not agree that the removal of the existing provision helps improve clarity. Please can Ofgem explain how this is the case.</i></p>
FINANCE ISSUES	
SUPPORTING INFORMATION	
OFGEM ENGAGEMENT:	