RG008: IGT UNC Part Review

Purpose:

As part of the ongoing works with RG008, a review of all the existing parts in the IGT UNC is needing to be undertaken. The purpose of the review is to identify any nuances, and any housekeeping changes within Code. Once identified, these will be made aware to the incoming Code Manager to assist the work of Code Consolidation. Where text is red, this denotes a housekeeping change. Where N/A is applied, this means there are no identifiable nuances.

Part N – CDSP and UK Link

1. General

1.1.1 (c) provisions in relation to UK Link – Formatting in Code is off i.e. its not in line with a, and b. Separately, UNC goes into some more details as it talks to the DSC Committees, which the IGT UNC does not detail in this Clause.

1.2 (b) – "the "Large Transporter CDSP Licence Condition" is Standard Special Condition A15A (in respect of Large Transporters, other than National Gas Transmission) and A15 (in respect of National Gas Transmission) of the Gas Transporter's Licences;" – 'of' is underlined, presume this is a tracked change that needs to be resolved. Large Transporter CDSP Licence Condition is not defined in the UNC, but is defined as the "CDSP Licence Condition".

1.2 (e) – the IGT UNC customer classes are just limited to IGTs (Pipeline Operators), and Shippers (Pipeline Users). Whilst the UNC expands this to GDNs, NGT as well.

1.2 (j) - "GRDA Functions" are functions assigned to the CDSP as 'Gas Retail Data Agent' in the Retail Energy Code and shall have the meaning ascribed thereto in the UNC. – More of an observation, but UNC defers its definition to the REC, whilst the IGT UNC defers it to the REC, as well as that of the UNC.

Additionally, the UNC GTD 1.2 explores additional definitions in that of: "CDSP Cost", "CDSP Charge", "CDSP Year", "DCC Licence" (note we do refer to the "smart meter communications licence in Part K, Clause 23.6), "IGT Code Communication".

1.3.1 (ii) is provided to a person or persons of a class which are not Parties, where one of the following conditions is met: (aa), (bb), (cc) – Formatting question, not sure we have used (aa), (bb), (cc) before. Could this not just be (a), (b), and (c)?

1.3.3 – "If the Authority consents (under paragraph 7(b) of the CDSP Licence Condition) to the CDSP providing a service beyond what is provided in paragraph 1.3.1, and such service is provided to Core Customer(s) under the DSC, such service shall be treated as being a CDSP Service." – Same text that is used in the UNC, do we need to define what the CDSP Licence Condition is here? Are we talking to the Large Transporter CDSP Licence Condition? (we are given the reference and context, note comments on 1.2 (b)). We will

Commented [AB1]: Formatting issues. All headings here are in all caps. Furthermore, these further sections titles are not underlined, but previous titles are.

Commented [AB2R1]: Similarly, uses Paragraphs over Clauses which is incorrect.

Commented [AB3R1]: Also on the main contents page, the subheadings are not listed.

need to add 'Large Transporter' in front of CDSP Licence Condition. Reference to 7 (b) is incorrect and should be 5 (b).

1.3.4 1.3.4 If a question arises as to whether a service being or proposed to be provided by the CDSP qualifies as a CDSP Service under paragraph 1.3.1(b): … and if (following such consultation) the Large Transporters are not satisfied that the service does so qualify, the CDSP in consultation with the Large Transporters shall take such steps as are necessary to cease or not to commence the provision of such service unless the Authority consents to such provision under paragraph 7(b) of the CDSP Licence Condition; and nothing done by the CDSP pursuant to this paragraph 1.3.4 shall be a breach of the DSC. – As above, reference to 7 (b) is incorrect, and should be 5 (b).

Commented [AB4]: *UNC 0948FT: Housekeeping: Correction to General Terms Section D* is looking to resolve the same issue within the UNC.

Commented [AB5R4]: IGT185 resolves this.

Commented [AB6]: *UNC 0948FT: Housekeeping: Correction to General Terms Section D* is looking to resolve the same issue within the UNC.

Commented [AB7R6]: IGT185 resolves this.

2. CDSP Services and Role of CDSP

2.1.1 Direct Services comprise: (c) services provided under the DSC to Core Customers which are not prescribed by the Code (as the case may be), comprising: (i), (ii), (iii) – these subclauses need to be formatted so they descend from (c), as at present they are in line.

2.1.2 Direct Services within paragraph 2.1.1(a) comprise: (a) performance of the following Direct Functions under the Code: (i), (ii), (iii), (iv), (v) – Same issue as above.

> 2.1.2 (iv) "providing through a contract service line in the DSC Daily Meter Service Provider services and maintaining datalogged Daily Read Equipment including obtaining Meter Readings in respect of Class 1 Supply Meter Points in Part D;" – This is not included in the UNC GTD 2.1.2 paragraphs.

2.2.1 Agency Services comprise (a) the performance of certain functions of the Pipeline Operator under the Code, as the case may be (such functions to be performed by the CDSP being "Agency Functions"; - Missing a closed ")" bracket for the clause.

2.2.2 – the UNC equivalent clause includes a paragraph on the "*the performance of the Agency Functions of the CDSP (in connection with data flows between Transporters and Independent Gas Transporters in IGTAD Sections D and E; and*" – whilst the IGT UNC does not.

2.2.3 - In relation to Agency Services which are Code Services, where the Agency Functions of the CDSP include sending or receiving Code Communications or making determinations on behalf of any Pipeline Operator: (b) (i), (ii), (iii) – formatting needs to be resolved, stuck in line when it should be descended.

2.3.6 – "Where, in connection with Direct Services, a provision of the Code confers on the CDSP any discretion or choice, or requires or entitles the CDSP to make a judgement or form an opinion, in connection with any action taken or communication given by a particular Party (the **relevant** Party):" – Relevant is randomly bold.

2.5.2 – "In this paragraph 2.5 references to data are to data maintained by the CDSP in the Supply Point Register pursuant to the provisions of the Code, the IGT Code, the Retail Energy Code or a Gas Transporter's Licence." – This is lifted from the UNC legal text. But reference to the Code, and the IGT Code, could probably do with some clarity.

3. UK Link – N/A

Part P – Performance Assurance

1. General – N/A

2. Performance Objective – N/A

All references to Clauses are lowercase, when they should be upper case.

Commented [AB8]: Not a make or break issue.

3. Performance Assurance Committee – N/A

All references to Clauses are lowercase, when they should be upper case.

4. Performance Assurance Framework – N/A

All references to Clauses are lowercase, when they should be upper case.

5. Appeals – N/A

6. Appointment of PA Representative – N/A

All references to Clauses are lowercase, when they should be upper case.

7. Disclosures for the Purpose of Performance Assurance

7.1 - "-For the purposes of" - has an unnecessary dash ahead of for.

All references to Clauses are lowercase, when they should be upper case.

8. Decisions of the PAC

8.2 – No decision of the Performance Assurance Committee may be made or (if made) shall be effective if the decision would cause any Party or the CDSP to be in breach of the IGT UNC – would only suggest as a nuance as it specifically calls out the IGT UNC.

All references to Clauses are lowercase, when they should be upper case.

9. Performance Assurance Reports – N/A

All references to Clauses are lowercase, when they should be upper case.