

GT SECTOR	
REFERENCE NUMBER:	CATEGORY:
LICENCE CONDITION NUMBER: <i>(if relevant):</i>	SpC 4.4
TITLE:	Entry Capacity and Exit Capacity Constraint Management
RELEVANT LICENCE CONSULTATION QUESTIONS <i>(if any):</i>	Q27 – captured under generic question on views of the proposals for changes to GT licence
RELEVANT ISSUES LOG:	Gas Transmission Issue Logs_4.4 - 3B - CCM Issues Log
POLICY ISSUES	
<ul style="list-style-type: none"> Incentive Design 	<ul style="list-style-type: none"> We don't agree with Ofgem's policy position on this incentive as we believe it is not aligned with customer interest and value. Please see our response to DD question GT Core 1 and NGGT question 4 for our detailed policy position. <p>PART A</p> <ul style="list-style-type: none"> 4.4.3, 4.4.21 and Appendix 1 refer to a CMCE term. Appendix 1 does not contain any values for CMCE and there are no licence provisions that allow NGGT to request, or Ofgem to direct, updated values for CMCE. If this is Ofgem's policy intent then all references to CMCE could be removed from the licence
DRAFTING ISSUES	
<ul style="list-style-type: none"> 4.4.1 4.4.11 4.4.12 	<ul style="list-style-type: none"> Should cross refer to Special Condition 2.5 4.4.11 does not state a date or period when the licensee must submit the report by. We suggest a standard timing of 28 days following the last action taken (e.g if the constraint is for 30 days, 28 days from the 30th day). Drafting would read " the licensee must, no later than 28 days following the last relevant Constraint Management action taken by the licensee submit..." Whilst we appreciate 4.4.12 is based on the exiting 3B.20 we would question whether it is required. If it is retained then we suggest it states that the Authority will direct whether or not the licensee has satisfied the requirements of 4.4.10
FINANCE ISSUES	
SUPPORTING INFORMATION	
OFGEM ENGAGEMENT:	