

## MEMORANDUM

TO: GTAC Stakeholders  
FROM: First Gas  
DATE: 15 August 2018  
RE: Block 3 Support Materials - 3 Change Requests Timings

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This memo summarises proposed changes to Code Change Requests timeframes in response to the GIC Final Assessment Paper (FAP). This material will be discussed at the workshop on Change Requests Timings on 23 August 2018.

### Final Assessment Paper (FAP) Findings

The findings of the FAP on change requests were as follows:

- 5 business day deadline for additional information is unfair (26, 105)
- Draft change request timing does not give enough time for change requestor to review submissions (26, 105)

In terms of providing additional information, the GIC considered that the deadline for provision of information under s.17.6 within 5 days may be unrealistic and the timing of the information should be set in the context of the scope of information being provided. We agree that parties should have enough time to provide the additional information requested via section 17.6 of the GTAC.

The GIC also considered that the deadline for submission of the Change Request under s. 17.9 of the GTAC only allowed the Change Requestor 3 Business Days to review submissions received under section 17.7. We agree that these timings are too short.

### Proposed changes to the GTAC

To address the FAP concerns, First Gas proposed the following changes to the GTAC:

- Make the deadline for provision of information requested under 17.5 'as soon as reasonably practicable' but with the ability of the Change Requestor to set longer deadlines based on the scope of the information requested.
- Set timings from 17.6 onwards relative to the deadline for further information agreed in s. 17.6 rather than the submission of the Draft Change Request as follows:
  - 17.7 submission on Draft Change Request - +5 Business Days from additional information being published
  - 17.9 Change Requestor's Change Request considering information in s. 17.7 - +5 Business Days from First Gas publishing submissions received under 17.7
- Set a long stop timing for the process up to 40 Business Days to ensure that Change Requests do not drag out.
- Allow the Change Requestor to reasonably decline requests for further information where the scope of the request would unduly delay the process.

## Summary and Next Steps

We believe that the proposed changes outlined in this paper addresses FAP concerns referred above, by:

- Allowing parties more time to provide the additional information requested via section 17.6 of the GTAC should the scope of the information request require it; and
- Provides the Change Requestor 5 Business Days to review submissions received under section 17.7 of the GTAC.
- Maintains the intent of a timely process for Change Requests.

We look forward to discussing these suggestions with stakeholders at our workshop on 23 August.