

MEMORANDUM

TO: GTAC Stakeholders
 FROM: First Gas
 DATE: 27 August 2018
 RE: Block 3 Outputs – 5 Change Requests

This memo describes details of the proposed changes to the change request provisions in the GTAC. These proposed terms follow on from discussions at the workshop on Wednesday 23 August 2018 as documented at that meeting.

The proposed change request drafting changes are provided in appendix 1 of this memo. Stakeholders will have an opportunity to comment on these provisions during the Drafting Feedback workshops on 4 to 6 September. Stakeholders will be able to formally submit on these provisions once the GTAC is issued for consultation in mid-September.

Final Assessment Paper (FAP) findings

The findings of the FAP relating to change requests were summarised in the GTAC work programme 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)

Positions reached

The following positions were reached during the workshop. The way these points have been addressed is given in the table below.

Item	Addressed by
The timing of the change request should provide additional time for the Change Requestor to amend the Change Request following submissions. The timing of the Change Request process should lever off the provision of additional information if additional information is provided under section 17.5.	Changes to sections 17.5 to 17.9 (see timing below).
There should be a right to refuse onerous or irrelevant information requests.	Changes to section 17.6 to provide for this.
The scope of section 17.14(a) should be broadened to include all parties to the GTAC breaching the RPO standard and to include the potential for the change to be inconsistent with other parts of the code or ICAs.	Section 17.14(a) has been amended to allow for this.

Item	Addressed by
First Gas should be able to notify that it does not support Change Request in s. 17.9 to ensure that it is not excluded from using its veto right in the event of a material change in the Draft and final Change Requests.	Section 17.14 has been amended to allow First Gas to notify.

Change Request timing changes

The following table sets out the original (December GTAC) and revised Change Request timing.

Action (section reference)	Previous Timing (Business Days)	Revised Timing (Business Days)
17.3 Draft Change Request submitted	-3	-3
17.4 First Gas will publish Draft Change Request on OATIS	0	0
17.5 Requests for further information	+10	+15
17.6 Provision of further information	+15	+25
17.7 Submissions on the Draft Change Request	+20	+30 <i>30 BD from Draft Change Request (17.3); or 5 BD from provision of further information (17.6)</i>
17.8 First Gas publishes submissions on the Draft Change Request.	+22	+32
17.7 Submission of Change Request by Change Requestor	+25	+42 <i>42 BD from Draft Change Request (17.3); or 17 BD from provision of further information (17.6)</i>