

Agenda Item for discussion at EMIB Meeting 30 March 2012

1. Context

The RIIO-GD1 Decision on strategy for the next gas distribution price control provided that Ofgem would develop licence requirements for GDNs to provide information requirements for different types of entry customers, and that this would be done in conjunction with GDNs and potential entrants to ensure they are tailored to the needs of respective entry customers.

Draft licence conditions were recently circulated to the GDNs for comment, and one of the conditions covers the Distributed Gas: Connections Guide and Information Strategy. It's clear from the initial comments received from the GDNs that this licence condition should be discussed at a working group level before it can be finalised. While the drafting of the Guide will be a more interactive industry initiative, it is important to ensure that the licence condition is fit for purpose.

As the issue has been a point of discussion at the last EMIB meeting, I've put the topic on the EMIB agenda for the 30th March 2012, although it's not strictly speaking covered by the TOR for the EMIB group.

It would be useful for the meeting to discuss the draft condition, issues raised, and the best way forward.

It should be noted that the licence drafting needs to be finalised under tight deadlines, and needs to be well advanced by mid-April 2012.

2. Information provided and way forward

Information provided below includes:

- Annexure 1 - The Draft Licence Condition (version 2 December 2011) text which all GDNs were requested to provide comment on.
- Annexure 2 - A summary of the comments / concerns raised by GDNs and an initial response to those comments.
- Annexure 3 - A revised version of the draft licence condition addressing some of the concerns.

We propose that the way forward should be:

- a. High level discussion at EMIB meeting on 30 March 2012, touching on some of the principle comments already received
- b. All interested parties to submit additional written comments based on the proposed revised condition (in 5 below) to Lesley.Ferrando@ofgem.gov.uk by Wednesday 11th April 2012
- c. These additional comments will be considered and where necessary included in the draft licence condition
- d. Any comments and the revised draft condition will be processed through the licence drafting Working Group processes for finalisation
- e. All interested stakeholders (other than GDNs who will be automatic participants) should indicate their interest in being involved in an industry working group which may be established later in the process to set out the detailed information required in the Guide and Information Strategy.

Annexure 1 - Draft Licence Condition (v2 Dec 11)

GDC83. Distributed Gas: Connections Guide and Information Strategy

[Not yet discussed at working group]

Introduction

- XX.1 This condition applies on and after [XXX] for the purpose of ensuring that the licensee:
- (a) makes information available in the public domain that will assist any person who might wish to enter into arrangements with the licensee that relate to the connection of Distributed Gas to the licensee's Distribution System to understand and evaluate the process for doing so; and
 - (b) implements a Distributed Gas Information Strategy in respect of that information and also of other information more generally related to Distributed Gas connections.

Part A: Scope and contents of the Distributed Gas Connections Guide

- XX.2 Where the Authority gives the licensee a direction to do so, the licensee must work collectively with such other licensees as are also subject to a direction under this condition ("relevant licensees") to prepare and maintain a common set of documents, approved by the Authority and to be known as the Distributed Gas Connections Guide, that:
- (a) is in such form as may be specified in the direction for the purposes of this condition; and
 - (b) contains such information as the licensee can reasonably provide that identifies or relates to the matters specified in paragraph XX.3.
- XX.3 Those matters must (without limitation) include:
- (a) details of the statutory and regulatory framework (including health and safety considerations) that applies to Distributed Gas connections;
 - (b) the likely costs, charges, and timescales involved in the application process typically operated by Gas DN Operators in respect of such connections;
 - (c) details of the arrangements and opportunities available for competitive activity in the provision or procurement of such connections; and
 - (d) engineering and other technical matters relevant to the commissioning, injection, and maintenance of such connections.

Part B: Preparation and revision of the Distributed Gas Connections Guide

- XX.4 The licensee must, together with the relevant licensees:

- (a) prepare and issue the Distributed Gas Connections Guide, as approved by the Authority, within a period of three months after the date of the Authority's direction; and
- (b) except where the Authority otherwise consents, review and where appropriate revise the Guide in each following Regulatory Year to ensure that, so far as is reasonably practicable, the information contained in it is up to date and accurate in all material respects.

Part C: Licensee's Distributed Gas Information Strategy

- XX.5 Where the Authority gives the licensee a direction to do so, the licensee must prepare a Distributed Gas Information Strategy, for the approval of the Authority, which sets out how the licensee intends to ensure that all existing and potential users of its Distribution System are able to receive an adequate level of information and a satisfactory standard of service in relation to the Distributed Gas connections process and matters relevant to it.
- XX.6 In particular, the scope and contents of the Distributed Gas Information Strategy must cover how the licensee will provide information to all such users, by type of user, in a form and manner tailored to their particular needs and designed to help them to:
 - (a) understand the Distributed Gas connections process and the likely range of the costs and timescales involved in obtaining such connections;
 - (b) form an indicative view, by reference to the likely costs and timescales involved, of the most (and the least) advantageous locations within the licensee's Distribution Services Area in which to obtain such connections;
 - (c) understand in appropriate detail the connection opportunities available to Distributed Gas schemes in a specified locality within that area, and the factors driving any constraints;
 - (d) make an indicative assessment of the connection costs applicable to any specific Distributed Gas scheme within that area; and
 - (e) request a formal quotation for the connection of a specific Distributed Gas scheme to the licensee's Distribution System.
- XX.7 The licensee must submit the Distributed Gas Information Strategy for the approval of the Authority within the time period set out in the Authority's direction (which must not be a period of less than 28 days).
- XX.8 The licensee must implement its Distributed Gas Information Strategy, as approved by the Authority, with effect from such date as may be specified by the Authority when it approves the strategy.

Part D: Review and revision of the Distributed Gas Information Strategy

- XX.9 The licensee must review its Distributed Gas Information Strategy at least once a year with a view to ensuring that it remains fit for the purposes envisaged by Part C above and, with the consent or at the direction of the Authority, must make any changes to the strategy that may be necessary to enable it to better achieve those purposes.

Part E: Procedure for directions under this condition

- XX.10 Before the Authority gives a direction under this condition, whether in accordance with Part A or Part C, it must inform the licensee of its intention to do so in a Notice that:
- (a) states the date on which it is proposed that the direction should take effect;
 - (b) sets out the proposed contents of the direction with respect to the form in which the Distributed Gas Connections Guide or the Distributed Gas Information Strategy (as the case may be) is to be prepared and maintained for the purposes of this condition; and
 - (c) specifies the time (which must not be less than a period of 28 days from the date of the Notice) within which representations with respect to the proposed direction may be made.
- XX.11 The Authority must consider any representations that are duly made and are not withdrawn.
- XX.12 A direction under this condition, whether in accordance with Part A or Part C, may be given at any time in a Regulatory Year.

Part F: Availability of the Guide and the Strategy

- XX.13 The licensee must give the Authority a copy of the Distributed Gas Connections Guide and the Distributed Gas Information Strategy and of each revision of either document.
- XX.14 The licensee must also:
- (a) give or send a copy of the Distributed Gas Connections Guide to any person who requests one and who makes such payment to the licensee as it may require (which must not exceed such amount as the Authority may from time to time approve for that purpose in respect of the document); and
 - (b) publish the Distributed Gas Connections Guide in such manner as the licensee believes will ensure adequate publicity for it (including by making it readily accessible from the licensee's Website).

Part G: Interpretation

- XX.15 The requirements for consultation under Part E above may be satisfied by action taken before, as well as by action taken after, the commencement of this condition.
- XX.16 In this condition, **Distributed Gas** has the meaning given to it in Price Control Condition 2 (Definitions for the Price Control Conditions) and the expressions "Distributed Gas Connections Guide" and "Distributed Gas Connections Strategy" are to be read in accordance with that meaning.

Annexure 2 - Initial comments received from GDNs

Licence Reference number(s)		GDC83				
Document title		Distributed Gas: Connections Guide and Information Strategy				
Ofgem policy contact		Lesley Ferrando				
No.	Section (comment applies to)	Comments	Comment from	Initial response / additional comments	To be debated or revised?	Way forward
1	General	<p>There is a lot of detail in this condition which needs to be discussed at working group level first to ensure we have appropriate and robust arrangements but realistic or achievable obligations for Gas Transporters.</p> <p>It is also important that this condition is developed in a manner that does not introduce conflict and show undue preference for one category of customer relative to another. There is a risk that as drafted it could be perceived to give undue preference or discriminatory treatment to Distributed Gas connections.</p>	SGN	Agree that the condition should be debated at working group level. The work could it be included in existing industry initiatives? Which? (EMIB / ENA /??)		
2	General	Not in agreement that this should be a joint DN process. Each of these applications, and they will undoubtedly be few and far between, are likely to be very site specific. The requirements in effect seem to require a location by location analysis of the totality of our network, which is absurd.	WWU	Disagree - There is a level of information which can be made available in terms of general principles and approach. Some locational information would be project specific but not all.		
		Although it is recognised that these conditions are intended to apply to GDNs in relation to the RIIO-GD1 price control, similar conditions should also be applied to Independent Gas Transporters, for the benefit of the Distributed Gas market, and in the interests of a level playing field.	NGGD	See comment below	N	No further action required at this time

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Ofgem policy contact		Lesley Ferrando				
No.	Section (comment applies to)	Comments	Comment from	Initial response / additional comments	To be debated or revised?	Way forward
3	XX.1	This should also apply to IGT's	WWU	While the provision of information should be applied to IGTs too it would not be through this licence condition	N	No further action required at this time
4	Part A XX.2	<p>Scope and contents of the Distributed Gas Connections Guide</p> <p>The relevant licensees are required to work collectively to prepare and maintain a <u>common set of documents</u> to be known as the Distributed Gas Connections Guide.</p> <p>While recognised that it would assist the market if as far as possible common arrangements applied in respect of all areas of the country (ENA Distributed Gas Group discussing common approaches), it may not always be possible to agree completely identical arrangements across four different companies, and the Guide should make provision for different arrangements to apply where this is necessary.</p>	NGGD	Agree that the wording of the condition could be revised to be less specific on some issues (see later comments on specific clauses). Some regional differences could probably be expected.		
5	XX.2	'Common set of documents' – while the GT's are aligned on most issues, there are some where we have differences and the documents need to allow for this. In addition, requiring a common set of documents tends to prevent innovative ideas being developed by one GT. Suggest adding 'as far as possible' after 'common set'.	WWU	The common set of documents does not preclude a GT going 'over and above'.		

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6	XX.3 (b)	<p>The draft Condition requires the Guide to set out “<i>the likely costs, charges, and timescales involved in the application process typically operated by Gas DN Operators in respect of such [Distributed Gas] connections</i>”.</p> <p>NGGD suggests that as the market for distributed gas connections is currently at a very early stage, it will take some time before the application process becomes more standardised and therefore amenable to close definition of costs and timescales.</p> <p>Whilst it may be possible to give a timescale for provision of preliminary information (e.g. location of nearest pipeline) and for provision of a preliminary design study, bespoke feasibility / design studies are required to provide more detailed forecasts of the costs and timescales for projects.</p>	NGGD	Agree. Suggest that the Guide could set out the categories of typical costs and charges while allowing bespoke studies per project. Timescales for provision of information can be provided / standardised. This would need to be discussed through an industry workgroup.		
7	XX.3(b)	<p>1) For the areas of work where only the GT can provide the services we can describe the costs and timescales for some elements; however as this is a new area some elements will be subject to feasibility studies and therefore costs of some elements and the timescales are not known.</p> <p>2) Where the activity is competitive then this is not reasonable to expect the GT to give prices and as for (1) they will be subject to individual studies. We could give indicative prices for feasibility studies and indicative timescales.</p>	WWU	Generally agree – as stated above, it might be best to set out the cost <i>elements</i> and factors which the applicant could influence. Indicative prices and timescales could be given (link to response above).		

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8	XX.3(d)	We are assuming that the building of the entry facility will be competitive and we could provide what we require from parties that connect to our network to demonstrate that they have a safe system etc. However the actual process of commissioning and maintenance will be controlled by the owner of the facility which may not be the GT.	WWU	The Guide would need to set out the technical and engineering requirements. No change to wording seems to be required	Confirm that no change to wording is required	
9	XX.4(a)	Assuming that this licence condition will not be implemented before 1 st April 2013 this is reasonable,; however as a general principle 3months to write and agree it between the GTs would be too short.	WWU	Accepted but as this is work in progress at the moment it should be well progressed by the time the condition is implemented. The direction could come at any time (simultaneously or afterwards)	Confirm that no change to wording is required	
10	Part C XX.6	<p>Licensee's Distributed Gas Information Strategy</p> <p>Provision of information "<i>by type of user, in a form and manner tailored to their particular needs</i>" is a very onerous requirement and should be deleted.</p> <p>GDNs have received very positive feedback from potential connectees on provision of information, but it is unreasonable to require GDNs to adopt a different approach for every user who enquires about a new connection.</p>	NGGD	This wording was specific to distributed generation and should be revised. The workgroup should consider whether a different process / strategy is required for different types of distributed gas.		
11	XX.6	<p>'Particular needs' - To date potential entrants have been positive about the information we have provided so what we are currently doing seems to meet our customer's requirements</p> <p>As drafted this could be onerous if we have to tailor information to different groups such as AD operators using different feedstocks or different types of distributed gas such as coal bed methane, landfill gas, LNG, Shale gas etc.</p>	WWU	See response to 3 above – needs further debate		

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12	XX.6 (a)	re “the likely range of costs and timescales involved in obtaining ... connections”, the comment above in relation to XX.3 (b) applies.	NGGD	Agree - the information could however include factors which would impact on the costs and give an indication of the likely range, while highlighting that individual circumstances could affect both		
13	XX.6(a)	As for the response to XX.3, it is difficult to give likely ranges as only 2 plants have been built in Great Britain and none in WWU's area. These will all be sufficiently complex jobs as stated in our 4B statement for some time until we have connected enough to be more confident about any indicative figures.	WWU	Very similar comment. See response above		
14	XX.6 (b)	re the requirement that the Strategy must cover how GDNs provide information to users to help them to “ <i>form an indicative view, by reference to the likely costs and timescales involved, of the most (and the least) advantageous locations within the licensee's Distribution Services Area in which to obtain such connections;</i> ” National Grid has been unable to identify a methodology to provide information in general terms that would fulfil this requirement across the gas supply area of a GDN. Such information is intimately linked to the proposed gas input quantity, quality and pressure at particular locations (and the possible interaction of a number of possible inputs), and also to the forecast demand on particular parts of the network across a calendar year and in future years. It is however relatively straightforward for GDNs to provide information on their ability to accept gas inputs in relation to requests associated with specific locations and specific quantities.	NGGD	It should be possible to at least give an indication of areas where it is more / less feasible and reasons.		
15	XX.6(b)	It should be noted that this service is not provided for exit connections and therefore it is not reasonable to provide it for	WWU	See comment above. Some information should be provided but not necessarily in		

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		entry connections. The network is constantly changing with new loads coming on and changes in exit capacity. We can give general guidance about which pressure tiers are most likely to be suitable but each connection needs to be individually assessed.		the detail as set out. Level of detail needs to be discussed by workgroup.		
16	XX.6 (c)	<p>re the requirement that the Strategy must cover how GDNs provide information to users to help them <i>to “understand in appropriate detail the connection opportunities available to Distributed Gas schemes in a specified locality within that area, and the factors driving any constraints;”</i></p> <p>National Grid currently fulfils this requirement by offering to provide a (chargeable) preliminary design study in relation to specific enquiries, including possible network connection points, capacity to accept gas and budget costs of connection. We believe that such a design study would fulfil this licence obligation, but note that it relates to one Distributed Gas scheme enquiry only, and that providing information on <i>“connection opportunities available to [a number of] Distributed Gas schemes in a specified locality”</i> would be subject to the same problems as set out in our comment on XX.6 (b) above.</p> <p>NGGD suggests that the text is revised to say <i>“... connection opportunities available to a Distributed Gas scheme in a specified locality...”</i></p>	NGGD	GDNs need to examine how much information on individual design studies could be shared between different applications applicable to that area to limit costs. This needs to be discussed by the working group.		
17	XX.6(c)	We already provide a chargeable service to provide information on the capacity available and can provide a budget estimate of the connection cost for a specific scheme. However if the customer wants this information for a number of locations we would need to do the analysis for each location and charge for each.	WWU	Basic information should be available at no / limited cost. A chargeable costing / feasibility study should be more targeted. Link to comment 16 above.		

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18	XX.6(d)	See comment on XX.6(a) above, the cost of laying any connecting pipeline will also vary by location depending on the distance to the main and ground conditions.	WWU	Link to response 12 above.		
19	XX.7	Production of the Distributed Gas Information Strategy 28 days following a direction from Ofgem is too short a timescale (cf three months to produce the agreed Distributed Gas Connections Guide under XX.4(a)). In addition, there is no timescale set for the Authority to approve the Information Strategy. Following approval, there should be a further time period allowed (at least 28 days) for GDNs to implement the Information Strategy	NGGD	<p>The condition says not less than 28 days – could be more depending on specific circumstances. Would the Strategy not be a more high level document than the Guide and require less information? It could also be an academic point if the Direction only takes place once an Information Strategy has already been drafted. The Direction would be issued only after interaction with the GDNs.</p> <p>It would be difficult to set out an Ofgem approval timescale at this stage when we don't know how much work might be involved (suggest we could put in 'reasonable response time' or 'as specified in the Direction')</p> <p>We could allow a further 'reasonable' period for implementation which could be proposed by the GDN at the time of submission for approval and form part of the approval. Why does it have to be part of the condition?</p>		
20	XX.7	<p>There ought to be a period by which the Authority has to approve the Distribute Gas Information Strategy.</p> <p>Assuming that this licence condition will not be implemented</p>	WWU	As per response above. The Direction would only be issued at an appropriate time.		

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		before 1 st April 2013 this is reasonable,; however as a general principle 28 days to write and agree it between the GTs would be too short.				
21	XX.9	at the direction of the Authority' - Ofgem are keen on saying that the licence obligation are ours to fulfil allowing the Authority to direct changes to the strategy seems a bit strong	WWU	Approving or requiring changes is a necessary part of the regulatory process.		
22	Part E	A general point is that the regulatory process outlined in this section does not seem to hang together and does appear to be aligned to other processes for similar obligations already in the licence	WWU	Need to confirm whether this can be covered in a generic condition regarding directions		
23	XX.10 and 12	There is no reference to directions given under Part D.	NGGD	It would seem that the direction referred to under Part D is not a formal Direction, but rather a part of the approval process. This point will be raised with the legal team and Part D inserted if necessary		
24	XX.10	This does not mention Part D so what process applies to directions issued under Part D?	WWU	Response above		
25	XX.10	Ofgem needs to give reasons for its decision.	WWU	Not convinced that this is the place for giving reasons. If necessary we could insert an additional sub clause to that effect. Should be debated at working group.		
26	XX.13	There is no mention of any process for the Authority approving changes to the DG Connections Guide or Information Strategy. GDNs should be able to rely on a standard process such that if they have provided revised versions of these documents to the Authority and the Authority has not objected to any changes contained therein within 28 days then the revised documents should be deemed to be acceptable.	NGGD	Revision to the Guide is referred to in XX.4 and the Information Strategy in Part D. These could be expanded to describe the Authority approval processes for each. To be discussed by the working group.		

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27	XX.13	Is this saying that the Authority has to approve the original versions but does not have to approve changes although it can direct changes to be made? Surely a better approach is to for the Authority to have the ability to veto any changes. This would be consistent with the approach to changes to the 4B statement. We do not want yet another variation in the notify consent, approval, veto powers they have for various statements. There needs to be logic behind these difference or if there is no reason for the differences then a simple standard process.	WWU	Suggest revision to the wording. For discussion by workgroup.		
28	XX.15	<p>This seems a big point to concede to Ofgem. We should object to this clause unless it requires any consultation to specifically state that it is issued in relation to this draft condition and even then it sets an unwelcome precedent. I question whether Ofgem would allow the principle to work the other way but if they have then I am willing to concede the point</p> <p>This condition mentions consultation under Part E. Part E contains no mention of consultation, it talks about a direction and representation about the direction but this is not a consultation.</p>	WWU	<p>Another interpretation is that the requirements of Part E (for notification and consideration of representation) will not be ignored but could just have occurred prior to the implementation of the condition.</p> <p>While the word 'consultation' does not appear in Part E the process described is consultative.</p>		

Annexure 3 - Draft Licence Condition (Suggested Version 3 – based on the above)

GDC83. Distributed Gas: Connections Guide and Information Strategy

[Not yet discussed at working group]

Introduction

- XX.1 This condition applies on and after [XXX] for the purpose of ensuring that the licensee:
- (a) makes information available in the public domain that will assist any person who might wish to enter into arrangements with the licensee that relate to the connection of Distributed Gas to the licensee's Distribution System to understand and evaluate the process for doing so; and
 - (b) implements a Distributed Gas Information Strategy in respect of that information and also of other information more generally related to Distributed Gas connections.

Part A: Scope and contents of the Distributed Gas Connections Guide

- XX.2 Where the Authority gives the licensee a direction to do so, the licensee must work collectively with such other licensees as are also subject to a direction under this condition ("relevant licensees") to prepare and maintain a common set of documents, approved by the Authority and to be known as the Distributed Gas Connections Guide, that:
- (a) is in such form as may be specified in the direction for the purposes of this condition; and
 - (b) contains such information as the licensee can reasonably provide that identifies or relates to the matters specified in paragraph XX.3.
- XX.3 Those matters must (without limitation) include:
- (a) details of the statutory and regulatory framework (including health and safety considerations) that applies to Distributed Gas connections;
 - (b) the likely **cost elements**, charges, and timescales involved in the application process typically operated by Gas DN Operators (**GDNs**) in respect of such connections;
 - (c) details of the arrangements and opportunities available for competitive activity in the provision or procurement of such connections; and
 - (d) engineering and other technical matters relevant to the commissioning, injection, and maintenance of such connections.

Part B: Preparation and revision of the Distributed Gas Connections Guide

- XX.4 The licensee must, together with the **other** relevant licensees:
- (a) prepare and issue the Distributed Gas Connections Guide, as approved by the Authority, within a period of three months after the date of the Authority's direction; and

- (b) except where the Authority otherwise consents, review and where appropriate revise the Guide in each following Regulatory Year to ensure that, so far as is reasonably practicable, the information contained in it is up to date and accurate in all material respects.

Part C: Licensee's Distributed Gas Information Strategy

- XX.5 Where the Authority gives the licensee a direction to do so, the licensee must prepare a Distributed Gas Information Strategy, for the approval of the Authority, which sets out how the licensee intends to ensure that all existing and potential users of its Distribution System are able to receive an adequate level of information and a satisfactory standard of service in relation to the Distributed Gas connections process and matters relevant to it.
- XX.6 In particular, the scope and contents of the Distributed Gas Information Strategy must cover how the licensee will provide information to all such users, by type of user, in a form and manner tailored to their particular needs and designed to help them to:
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 - (b) form an indicative view, by reference to the likely costs and timescales involved, of the most (and the least) advantageous locations within the licensee's Distribution Services Area in which to obtain such connections;
 - (c) understand in appropriate detail the connection opportunities available to a Distributed Gas scheme in a specified locality within that area, and the factors driving any constraints;
 - (d) make an indicative assessment of the connection costs applicable to any specific Distributed Gas scheme within that area; and
 - (e) request a formal quotation for the connection of a specific Distributed Gas scheme to the licensee's Distribution System.
- XX.7 The licensee must submit the Distributed Gas Information Strategy for the approval of the Authority within the time period set out in the Authority's direction (which must not be a period of less than 28 days).
- XX.8 The licensee must implement its Distributed Gas Information Strategy, as approved by the Authority, with effect from such date as may be specified by the Authority when it approves the strategy.

Part D: Review and revision of the Distributed Gas Information Strategy

- XX.9 The licensee must review its Distributed Gas Information Strategy at least once a year with a view to ensuring that it remains fit for the purposes envisaged by Part C above and, with the consent or at the direction of the Authority, must make any changes to the strategy that may be necessary to enable it to better achieve those purposes.
- XX.X Where any changes to the strategy are proposed the revised strategy must be submitted to the Authority for Approval and the Authority must respond within a reasonable period.

Part E: Procedure for directions under this condition (proposal for generic condition covering directions to be considered – legal input)

- XX.10 Before the Authority gives a direction under this condition, whether in accordance with Part A or Part C (Parts A, C or D? – for legal confirmation), it must inform the licensee of its intention to do so in a Notice that:
- (a) states the date on which it is proposed that the direction should take effect;
 - (b) sets out the proposed contents of the direction with respect to the form in which the Distributed Gas Connections Guide or the Distributed Gas Information Strategy (as the case may be) is to be prepared and maintained for the purposes of this condition; and
 - (c) specifies the time (which must not be less than a period of 28 days from the date of the Notice) within which representations with respect to the proposed direction may be made.
- XX.11 The Authority must consider any representations that are duly made and are not withdrawn.
- XX.12 A direction under this condition, whether in accordance with Part A or Part C (Parts A, C or D? – for legal confirmation), may be given at any time in a Regulatory Year.

Part F: Availability of the Guide and the Strategy

- XX.13 The licensee must give the Authority a copy of the Distributed Gas Connections Guide and the Distributed Gas Information Strategy and of each approved revision of either document.
- XX.14 The licensee must also:
- (a) give or send a copy of the Distributed Gas Connections Guide to any person who requests one and who makes such payment to the licensee as it may require (which must not exceed such amount as the Authority may from time to time approve for that purpose in respect of the document); and
 - (b) publish the Distributed Gas Connections Guide in such manner as the licensee believes will ensure adequate publicity for it (including by making it readily accessible from the licensee's Website).

Part G: Interpretation

- XX.15 The requirements for consultation under Part E above may be satisfied by action taken before, as well as by action taken after, the commencement of this condition.
- XX.16 In this condition, **Distributed Gas** has the meaning given to it in Price Control Condition 2 (Definitions for the Price Control Conditions) and the expressions "Distributed Gas Connections Guide" and "Distributed Gas Connections Strategy" are to be read in accordance with that meaning.