

ET SECTOR	
REFERENCE NUMBER:	CATEGORY: Amendment
LICENCE CONDITION NUMBER: <i>(if relevant):</i>	SpC 9.17
TITLE:	Business Separation requirements and compliance obligations
RELEVANT LICENCE CONSULTATION QUESTIONS <i>(if any):</i>	
RELEVANT ISSUES LOG:	
POLICY ISSUES	
DRAFTING ISSUES	
<ul style="list-style-type: none"> Defined Terms 	<ul style="list-style-type: none"> The definition of “Compliance Statement” in the definitions annex for NGET needs to refer to Specified Duties. The current definition does not work in the context of SpC 9.17. In 9.17.3 “Specified Duties” are said to be referred to in 9.17.20 but the list of duties currently in Special Condition 20.15 have been removed. They should be added back to 9.17.20. “Shared Services” as referred to in 9.17.9 is not defined in the ET definitions annex. “De Minimis Business” as referred to in 9.17.9 and as defined in the ET definitions annex is not defined for the purposes of SpC 9.17 but for other specific conditions. We suggest that the existing approach is adopted and the term is defined within 9.17.9 by reference to Standard Condition B6. The definition of “Compliance Report” in the definitions annex for NGET needs to refer to Specified Duties. The current definition does not work in the context of SpC 9.17. The definition of “Compliance Officer” in the definitions annex for NGET needs to refer to Specified Duties. The current definition does not work in the context of SpC 9.17.
FINANCE ISSUES	
SUPPORTING INFORMATION	
OFGEM ENGAGEMENT:	