

iGT UNC / iGT INC Consultation Response

Date	13/09/2010
Reference	iGT028 Modification Proposal Consultation
Title	Remove the Must Read process for annually read sites
Respondee	British Gas
Position on the Modification	Support Modification (delete as required)

Facilitation of the relevant objectives

How this proposal will, if implemented, better facilitate the "code relevant objectives", as defined in Standard Condition 9 of the Gas Transporters Licence. For those answered Yes too, please provide a detailed explanation below the table.

<i>Relevant Objective</i>	<i>Yes/No</i>
a. the efficient and economic operation of the pipe-line system to which this licence relates	Y
b. so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters	
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	Y
e. so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers	
f. so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition	

Relevant Objectives to be better facilitated:

a. the efficient and economic operation of the pipe-line system to which this licence relates

The additional costs incurred by pipeline operators in obtaining reads is unnecessary. Pipeline users are still obliged to ensure meters are inspected on a two year basis under their Must Inspect license condition.

d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers

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Those Pipeline Users that obtain regular readings will benefit from accurate AQ values and energy cost allocation therefore securing effective competition between suppliers.

Likely impact on environment?

How this proposal will, if implemented, impact on greenhouse gas emissions?

Reducing unnecessary readings will reduce costs and have a positive impact on the environment.

Implementation issues including impact on your systems

None

Additional Information and Comments

Many Must Reads are undertaken by iGTs not because Pipeline Users have failed to obtain readings but because these readings have failed to be accepted or transferred correctly to the iGT. These underlying issues need to be addressed by iGTs together with Pipeline Users. Whilst these underlying issues are addressed it is unreasonable that iGTs continue to procure and charge Pipeline Users for Must Reads for annual read customers.

Completed forms should be returned to the iGT UNC Representative, Gemserv Ltd at iGT-UNC@gemserv.com or faxed to 020 7090 1001