

## Consultation Response

### iGT071: Updating the iGT AQ Review Procedures Ancillary Document

Responses invited by: 12 Sep 2016

#### Respondent Details

Name: Nicky Rozier

Organisation: Brookfield Utilities

Support Implementation

Qualified Support

Neutral

Do Not Support

**Please briefly summarise the key reason(s) for your support / opposition**

Due to the AQ process cutting across SSP implementation (making the AQ review unfeasible for iGTs) we are giving qualified support. This is on the basis a further modification will be raised to dis-apply the AQ review in 2017.

Whilst we recognise that as part of SSP there is a need to amend the AQ review procedures document the timing of SSP implementation would not allow iGTs to complete the AQ review process in 2017. We do, however, support the process developed. Alternatively, a transition document could put in place to cover the AQ review in 2017.

## **Self-Governance Statement**

**Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?**

Brookfield agree this modification meets the criteria of self-governance.

**Please state any new or additional issues that you believe should be considered**

## **Relevant Objectives**

**How would implementation of this modification impact the relevant objectives?**

We feel objective f) has been met and this modification promotes the efficiency in the implementation and administration of the code.

## **Impacts and Costs**

**What development and ongoing costs would you face if this modification was implemented?**

We envisage there to be no significant costs but a small extent of system change to accommodate receiving the data from Xoserve as opposed to producing the information.

## **Implementation**

**What lead time would you wish to see prior to this modification being implemented, and why?**

We would require a specified period between our obligation to provide the draft NExA table (both for our system adjustments and for the AiGT secretary to collate on behalf of the iGTs) and the mod implemented. As the PNID has not yet been firmed up we are unable to determine when this changed AQ review process will kick in.

## **Legal Text**

**Are you satisfied that the legal text will deliver the intent of the modification?**

In terms of an enduring process we believe the legal text is fit for purpose, but, with regards to the 2017 AQ review, please see above comments.

## **Further Comments**

### **Is there anything further you wish to be taken into account?**

Within the ancillary document the installation reads have now been removed from the excluded criteria, therefore included within the process. We would like to highlight that previously installation reads were always excluded from the NExA table, regardless of the period between installation read and first cyclical read (this is due to the potential for properties to lie vacant for a period before occupancy meaning the consumption would not be an accurate reflection.)

We acknowledge Xoserve have said they will not be able to undertake or support the AQ review for 2017, although this was confirmed after the Workstream meeting. We believe some form of derogation of our obligation may need to be considered.

**Responses should be submitted by email to [iGTUNC@gemserv.com](mailto:iGTUNC@gemserv.com)**