

Consultation Response

iGT075: Identification of Supply Meter Point pressure tier

Responses invited by: 29 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

Brookfield Utilities would be reluctant to support a change, that could represent additional costs to iGTs, and that obligated a provision for which there had been no clear cost or efficiency benefits identified.

Notwithstanding the workgroup activity, we believe that the modification has several flaws.

For new connections we are likely to have a large number of Metering Points without the full postcode, and therefore, the report would not pick these up, resulting in following the manual GT1 request process.

Another area of confusion regarding this modification is that, the modification states the pressure is required at mains level however, the pressure tier should be identified at ECV level as this is where the works are to be carried out, we understand.

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 does not have any material impacts on existing or future gas consumers and if implemented meets the self-governance criteria.

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

The modification proposes the pressure is required at mains level. However, in order to send appropriate staff and metering equipment the pressure tier should be identified at ECV level as this is where the works are to be carried out.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We feel all objectives outlined have not been met. In many cases the GT1 process will still need to be followed and therefore implementing this modification will not provide a sufficient solution or improve the efficient and economic operation of the pipeline system. We do not feel mandating the iGTs to produce a pressure tier table promotes effective competition between the GDNs and the iGTs.

Impacts and Costs

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

We envisage there to be some costs associated should this modification be implemented. Systems changes would be required in order to record the data, however these costs are not offset against the lack of visibility of the benefits.

Implementation

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

We would require a minimum of 9 months implementation.

Legal Text

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

We believe, should the modification be implemented, the legal text is deemed suitable.

Further Comments

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

Given the points raised above, it would be reasonable for the iGTs to mirror the GDN approach and provide the data on a voluntary basis, in a standard format, as agreed by all iGTs.

There are two reasonable places to host the pressure tier table; via individual iGT websites or via our portfolio extract (using the free text field). However, if the latter were to be used an additional modification would need to be raised.

Responses should be submitted by email to iGTUNC@gemserv.com