

iGT UNC / iGT INC Consultation Response

Date	10/04/14
Reference	iGT054 DMR Consultation
Title	Alternative Profile for Prepayment Smart Meters
Respondee	Cher Harris SSE Pipelines
Position on the Modification	Do not support Modification

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 to, 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	N
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	N
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	N
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	N
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	N
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	N
g. so far as is consistent with sub-paragraphs (a) to (f), the compliance with the Regulation* and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators	N

* Regulation 2009/715/EC of the European Parliament and of the Council of 13 July 2009

Relevant Objectives to be better facilitated:

Likely impact on environment?

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

None identified

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Implementation issues including impact on your systems

Additional Information and Comments

This proposal will not have any impact on IGT charges so will not provide a benefit to Shippers. There is no benefit identified to IGTs either, yet IGTs are being asked to fund this change.

The proposal will require a considerable amount of manual work to run reports and validate the data before passing on to xoserve, which we currently have no spare resource to absorb, so we would be looking at taking on additional staff to implement this new process.

Prepayment and smart meters make up only a tiny proportion of our portfolio of meters, so the benefits case does not really stack up.

Further more, there will be no way for an IGT, or Ofgem, to validate whether or not a Smart meter was actually operating in PP mode at a given point in time and so is open to 'gaming'.

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