

iGT UNC / iGT INC Consultation Response

Date	
Reference	iGT050 Modification Proposal Consultation
Title	iGT & Shipper Metering Communications Ancillary Document
Respondee	British Gas
Position on the Modification	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	Yes
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	Yes
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	Yes
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	Yes
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	
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	

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

Relevant Objectives to be better facilitated:

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Implementation issues including impact on your systems

The proposal introduces changes to our system. This will result in the automation of meter flows removing the time consuming manual processes, which currently exists.

Additional Information and Comments

Following the development of the Meter Comms Workgroup set up to introduce IGT RGMA, IGT050 incorporates the best solution for all parties. Some parties felt IGT050 did not go far enough, wanting to implement a more full RGMA solution, where some parties felt that IGT050 went too far in providing a metering solution. British Gas accepts the right balance between these two points was reached, notwithstanding the fact we would support 'more full' RGMA and therefore we support the implementation of IGT050.

We are aware that GTC have raised an alternate which is a simplified model of the IGT050 proposal. The failing in the GTC simplification is that it does not appear to be possible to differentiate between genuine work booked by the Shipper and simply finding that there is a different meter on site. This has a major implication for Shipper and Transporter compliance with C&D Regulations. The benefit of RGMA is that it includes the ONJOB (genuine work - C&D notification) and the ONUPD (update to meter details - no C&D implication).

We believe that IGT050 will better facilitate competition between IGT and third party MAMs, and more closely align the main DNO and IGT arrangements. For example IGT50 supports the need to de-appoint the MAM separately from notifying the IGT. We believe this leads to a level playing field and we expect lower metering costs for the industry as a result. Leaving IGTs with the control and benefits of being the incumbent MAM with no separation and still putting Shippers to the expense of providing unnecessary MAM related information is illogical.

IGT050 introduces an enduring solution regarding RGMA flows. Our concern is that as Supplier meters numbers ramp up through various initiative such as smart it will become necessary to introduce some automation of the production of flows. This should lead to more efficient processes and reduce manual error of lost or incomplete flows.

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Furthermore we believe that IGT050 removes the requirement to process the information manually which will remove the requirement of 1 - 2 FTEs to manage the process resulting in costs savings.

We do not accept the assertion that it would cost a fortune for IGTs to implement IGT050. All the data on the proposed flows to be sent by Shippers is on the ONJOB and where it is missing (or optional) it is on an ONUPD.

Therefore to reduce costs in the long term, deliver an enduring regime and facilitate MAM competition we would support the implementation of IGT050.

If you have any questions please do not hesitate to contact me.

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