

## iGT UNC / iGT INC Consultation Response

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|-------------------------------------|---|
| <b>Date</b>                         | 14 December 2012  |
| <b>Reference</b>                    | iGT050 Modification Proposal Consultation                           |
| <b>Title</b>                        | <b>iGT &amp; Shipper Metering Communications Ancillary Document</b> |
| <b>Respondee</b>                    | Amie Charalambous, RWE npower                                       |
| <b>Position on the Modification</b> | 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  |               |
| 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   | <b>Yes</b>    |
| d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers   | <b>Yes</b>    |
| 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                           | <b>Yes</b>    |
| 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:*

### Likely impact on environment?

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

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None

### Implementation issues including impact on your systems

System changes would be required for the implementation of this modification

### Additional Information and Comments

RWEnpower supports the introduction of the iGT and Shipper Metering Communication Ancillary Document, and is in favour of the implementation of this modification rather than the alternative iGT050A.

We recognise the amount of time and work that all parties have put into the workgroup to bring this modification to the panel, this has happened because all parties are supportive of the intention to bring about uniformity across the industry, and recognise the benefits that this would bring to the end user/customer.

The addition of this modification, whilst not dependent, would also support the single service provision modifications. Although we feel modification iGT 050 will impact systems and have cost implications, npower acknowledges the benefits this modification will deliver and will outweigh the implementation costs.

UNC Mod 440 and iGT039 Use of a Single Gas Transporter Agency for the common services and systems and processes required by the iGT UNC, if approved, will bring about a significant change to the way that iGT's operate assisting with aligning the codes and provides a more consistent and uniform approach within the gas industry that is long overdue. This will reduce the cost to serve for iGT customers across the industry

Additionally, separating the Metering element of the communications will facilitate a move towards commercial metering arrangements, a step towards full metering unbundling that will lead to greater choice for Suppliers, and ultimately the end consumer.

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