

iGT UNC / iGT INC Consultation Response

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| Date | 9 November 2012 |
| Reference | iGT049 Modification Proposal Consultation |
| Title | AQ review amendment to tolerance for SSP sites |
| Respondee | npower |
| 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 | YES |
| 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 | NO |
| 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 | NO |
| 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 | NO |

* 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

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Implementation issues including impact on your systems

None

Additional Information and Comments

We fully support the implementation of this modification. Implementing this modification will not only align the iGT UNC with the UNC but will improve the accuracy of AQs.

Due to the continuing demand reduction by domestic customers AQ values are not accurately reflected. Ofgem want supplier to encourage customers to become more energy efficient and this modification will facilitate any changes in consumption to be better reflected in AQ values

We feel that this modification will provide greater accuracy and transparency to all parties within the market improving efficiency and reducing costs and will therefore, have a positive impact on customer bills.

We also believe that this will also assist the iGT's to plan their pipeline capacity, calculate transportation, reconciliation and energy balancing charges, therefore feel that this modification will also provide great benefits for the iGT's

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