

iGT UNC / iGT INC Consultation Response

Date	7 October 2009
Reference	iGT025 Consultation
Title	Changes to the Window for the Submission of Valid Meter Readings
Respondee	Envoy on behalf of IPL & QPL
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 Condition 9 of the Gas Transporters Licence.

- ~~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;~~
- ~~d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers;~~
- ~~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; and~~
- ~~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;~~

Additional Information and Comments

Envoy does not support this proposal as there is no explanation as to why the meter reads are not currently submitted within the 15 business day acceptance window. Envoy appreciates that the supplier validation is a complex process but would question whether there are issues with supplier agents not providing the information in a timely manner which is causing reads to be submitted outside of the 15 business day acceptance window. Envoy would like clarification on whether this is an issue and what steps have been taken to address this (if this is the case) before considering spending time and resource amending its own systems.

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Envoy also notes that the proposer states that “a greater number of Meter Readings will be available to allow for the reconciliation of I&C Supply Points”. Envoy would again refer to the point made in the above paragraph but also suggest that if the main objective is to submit a greater number of non-domestic reads that the proposal is amended to reflect this.

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