

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	10 September 2012
<b>Reference</b>	iGT048 Modification Proposal Consultation
<b>Title</b>	Estimated Opening Meter Reads Code Amendment
<b>Respondee</b>	Amie Charalambous 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	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	No
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	No
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	No
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	Yes
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:*

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### Likely impact on environment?

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

**None**

### Implementation issues including impact on your systems

**None**

### Additional Information and Comments

We believe that the implementation of this modification will provide clarification of the code and align industry practices. Npower believes that ambiguity in the code is misleading and creates confusion. A consistent approach across the industry regarding the timescale for submitted reads is required.

If this mod is approved, it will assist Gas Shippers/Suppliers to effectively manage customer relationships by billing customers more accurately this will go a long way to improving the customer experience and will enable a customer to have an accurate first bill.

It will also improve data integrity across the industry as a whole and will facilitate better use of the operation of the pipeline system.

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