

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	10/09/12
<b>Reference</b>	iGT048 Modification Proposal Consultation
<b>Title</b>	Estimated Opening Meter Read Code Amendment
<b>Respondee</b>	David McCrone, ScottishPower Energy Management Ltd
<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	
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	
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	

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

*Relevant Objectives to be better facilitated:*

Under the current drafting of the iGT UNC, a Shipper may incur a charge for an estimated opening meter read if an actual is not submitted before 1600 on the 7<sup>th</sup> Business Day after the Supply Point Registration Date (the ability to extend this window to the 10<sup>th</sup> Business

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Day is provided only at the iGTs discretion). We understand that the Large Transporter's Agent currently works to 10 Business Days and the equivalent UNC modification 0427 seeks to put this into code. This change will therefore align the two codes. Evidence also suggests that implementation of this Modifications will reduce the number of charging instances available to iGTs for providing an estimated opening meter reads for those customers on iGT networks where the Supplier has failed to submit a valid opening meter reading within the required timescales. Even without the successful implementation of UNC modification 0427 this modification will therefore reduce the cost to serve these customers and help to facilitate competition between suppliers (relevant objective d).

The additional 3 days will reduce the number of instances where iGTs are required to calculate an estimate opening meter read while in turn improving data accuracy. This better facilitates relevant objective f.

### **Likely impact on environment?**

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

None.

### **Implementation issues including impact on your systems**

There should be no or little impact on shipper systems. If a shipper did not want to use the additional 3 days then they could continue as now with no system changes required.

### **Additional Information and Comments**

None at this time.

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