

iGT UNC / iGT INC Consultation Response

Date	09/04/2014
Reference	iGT054/A/AA - DMR Consultation
Title	iGT054/A/AA-Alternative Profile for Pre-Payment Smart Meters
Respondee	Scottish Power Energy Retail
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 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	<i>Negative Impact</i>
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	
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:

We believe that implementation of these Modifications will be detrimental to competition between Shipper and Suppliers.

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Likely impact on environment?

None Identified

Implementation issues including impact on your systems

Systems changes would be required in order to implement the solution. Should Mod iGT054 be implemented, which includes a retrospective element, this will introduce additional uncertainty for SSP Shippers and further reduce the integrity of the gas Settlements process. As a consequence, some SSP Shippers and their customers Will be adversely impacted to the benefit of others.

Additional Information and Comments

Scottish Power is not in support of the implementation of either Modification. However, If one of the Modifications were to be implemented our preference would be iGT054A

ScottishPower confirm that we do not support either Modification. We believe that the Proposer has failed to provide sufficient evidence to demonstrate that an additional profile is required for PPMs. In addition we are not convinced that the costs to produce a report are so high as to be detrimental to the customers who would benefit from the new allocation. Adopting a EUC Profile which is not based on daily reads recovered from a robust test environment and acquired from all LDZs introduces risk to the market and in particular Shippers who operate within the SSP market sector. It is inconceivable that one group of customers is singled out at the expense of another class of domestic customers who may also have a different consumption profile from the standard profile which is currently applied. Implementing this modification will result in a cross subsidy being introduced between customers within the SSP market sector. This will introduce additional uncertainty to SSP shippers and further reduces the integrity of the gas settlements process.

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