

iGT UNC / iGT INC Consultation Response

Date	11 th April 2014
Reference	IGT054A FMR Consultation Response
Title	Alternative Profile for Prepayment Meters
Respondee	Jenny Rawlinson GTC
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	
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	

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It is GTC's understanding that there has been no clear evidence to demonstrate that the modification will greatly improve the energy/cost allocation. Therefore, GTC does not believe that any of the relevant objectives are better facilitated by this modification.

Likely impact on environment?

None

Implementation issues including impact on your systems

To implement this modification would require significant system development to reconcile the shipper monthly reports to GTC-held data.

Additional Information and Comments

Considering the above and the lack of cost benefit evidence, GTC cannot support this modification.

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