

iGT UNC / iGT INC Consultation Response

Date	11 th April 2014
Reference	IGT054AA DMR Consultation Response
Title	Alternative Profile for Prepayment Meters
Respondee	Jenny Rawlinson GTC
Position on the Modification	Qualified support for 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	Yes, (but see * below)
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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*GTC agrees with the proposer that, as a comparison with modification proposals iGT054 and iGT054A, this proposal better facilitates relevant objective f. 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 relevant objective d is better facilitated by this modification.

Likely impact on environment?

None

Implementation issues including impact on your systems

GTC believes that, having removed the retrospective and the smart meters in prepayment mode elements, this modification becomes a simple report. By this means, implementation should be fairly simple and achievable by 1st October 2014. However, see points below.

Additional Information and Comments

GTC supports the concept of accurate cost allocation and, therefore, also supports the process of reporting appropriate supply point information to enable this on Large Transporter sites. However, this modification proposal is dependent on the success of UNC 0486, which is still within the workgroup stage. In addition, assuming the approval of UNC 0486, there is no visibility of the file templates to be utilised between the iGTs and Xoserve. GTC's support of this modification is, therefore, dependent on the following two assumptions:

- That UNC 0486 is approved, and
- That the reporting of data between iGTs and Xoserve does not necessitate extensive system development and, thereby, excessive costs.

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