

iGT UNC / iGT INC Consultation Response

Date	11/04/2014
Reference	iGT054 DMR Consultation iGT054A DMR Consultation iGT054AA DMR Consultation
Title	Alternative Profile For Pre-Payment Meters
Respondee	Kiran Samra Npower
Position on the Modification	Support Modification IGT054A Do not support Modification IGT054 & IGT054AA

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.

Relevant Objective	Yes/No
a. the efficient and economic operation of the pipe-line system to which this licence relates	No
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	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	No
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	No
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

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Relevant Objectives to be better facilitated:

Npower agrees with proposer that Objective D is the appropriate objective. Npower believes that accurate cost allocation is vital for a competitive market to exist. Also that with the Implementation IGT054A would improve allocation of energy which would provide a more accurate profile of the amount of gas being consumed by customers on pre-payment mode.

Likely impact on environment?

None

Implementation issues including impact on your systems

Minimal

Additional Information and Comments

Npower supports modification IGT054A as it allows Xoserve to process data in a consistent way, another reason Npower back this modification is because the modification does not exclude smart meters in PP mode, which modification 54AA does, we believe this unfair as it excludes a certain sector of the market. IGT054A also aligns with UNC451A which was approved by Ofgem ahead of UNC451 which was rejected due to the retrospective element. Even though IGT54 has now removed the retrospective element we do not support this modification due to not mandating the Authority reports.

Npower would like the GT and IGT processes aligned as much as possible and that should be a consideration given that MOD451AV has been implemented. MOD0451AV (& now the proposed MOD0486) re-profiles energy based on the principal that PPM sites use less gas than typical residential customers in Winter & more in Summer. If parties maintain their customer base over a full gas year there should be minimal impact. However if parties increase their portfolio in the summer & decrease it in Winter then parties would not see the full benefits of this proposal. Equally the opposite is true where parties may pick up less allocation in Winter & not see the negative impact of increased allocation if they lose sites in the Summer.

Summary of rejected Modifications:



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IGT054AA - Does not have the element of retrospection either but within the modification that the IGT's will not be obligated to report on SMPPMs and that it will focus solely on a solution for the 30,000+ prepayment meters, therefore we do not support this modification

IGT054 - Is now identical to IGT054A after removing the retrospective element however does not mandate reporting to Authorities unless requested, therefore we do not 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