

iGT UNC / iGT INC Consultation Response

Date	14 th December 2012
Reference	iGT050 Modification Proposal Consultation
Title	iGT & Shipper Metering Communications Ancillary Document
Respondee	Dan Simons - EDF Energy
Position on the Modification	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	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	Yes
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	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	No

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

Relevant Objectives to be better facilitated:

Likely impact on environment?

None

Implementation issues including impact on your systems

iGT UNC / iGT INC Consultation Response

It is likely that implementation of IGT050 would impact both Pipeline Users and Pipeline Operators systems.

However, we anticipate that implementation of IGT050 would require only minimal change to our systems as the suggested file formats are very similar to the RGMA files already used to exchange data with the large Gas Transporters via the Xoserve UK Link system.

Additional Information and Comments

We note that some Pipeline Operators have expressed a concern over the scale of system change required to support IGT050, citing Mod iGT039 (iGT Agency Services) and the potential for Xoserve to carry out certain SPA activities on behalf of the iGTs, including metering communications.

However, we also note that discussions on Mod IGT039 are still ongoing and as with any modification proposal, there is no guarantee that it will be directed for implementation.

With the roll out of Smart Metering drawing ever closer, we see an inherent risk in relying wholly on acceptance of IGT039, particularly considering that there have been other proposals made for IGT single service provision in the past that have ultimately proven unsuccessful.

In addition, should IGT039 be accepted, we do not see any conflict with IGT050. If anything, implementation should make moving the metering arrangements across to Xoserve a far more straightforward process than it otherwise would be.

We do not consider that it will be viable for either Pipeline Users or Pipeline Operators to continue to exchange metering information manually via spreadsheet and email once the roll out of smart metering commences. Therefore, we fully support implementation of IGT050.

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