

iGT UNC / iGT INC Consultation Response

Date	21 September 2007
Reference	iGT003V DMR
Title	Implementation of AQ Table resulting from 2006 iGT AQ Review
Respondee	Independent Pipelines Ltd and Quadrant Pipelines Ltd
Position on the Modification	<p>Support Modification</p> <p>Qualified support for Modification</p> <p>Do not support Modification</p> <p>(delete as required)</p>
<p>Facilitation of the relevant objectives</p> <p>How this proposal will, if implemented, better facilitate the "code relevant objectives", as defined in Condition 9 of the Gas Transporters Licence.</p>	
<p>Additional Information and Comments</p> <p>Several comments have referred to the lack of robustness of the 2006 AQ Review undertaken by iGTs. Reference has also been made to the large variation in values between the 2005 AQ values and the 2006 values. These comments require addressing.</p> <p>The 2006 AQ Review Process was introduced following review of the previous AQ reviews, especially the 2005 process and sought to improve the robustness of the process and resulting AQ values. One of the actions to facilitate this was to embed the process into iGTs' network codes through the modification proposal process. This was supported by shippers with the intention that would provide an enduring robust solution for future AQ Reviews that would negate the need to raise network code modifications each and every year prior to the start of the AQ Review. It is to be assumed therefore that the process proposed and supported by the majority of shippers in Spring 2006 to achieve this outcome was robust, otherwise why raise the modification. Indeed, the majority of comments from shippers at the time supporting the modifications referred to putting in place a robust process. Reviewing the comments of the iGTs to these modifications, which at the time were to each iGT's individual network code, they too were in full support of the process as set out in the modification. It is a little concerning that some shippers appear to be rejecting the output of that review due to a perceived lack of robustness of the process. We would not dispute that there are improvements which could usefully be made to the AQ Review process, however we do not believe that the 2006 review was any less robust than that carried out in the previous year. Therefore, the resulting AQ values are no less robust than those calculated following the 2005 Review.</p>	

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