

iGT UNC / iGT INC Consultation Response

Date															
Reference	iGT032 Modification Proposal Consultation														
Title	Voluntary Withdrawal Process														
Respondee	(Please enter the name of the company you are replying on behalf of)														
Position on the Modification	Support Modification Qualified support for Modification Do not support Modification (delete as required)														
Facilitation of the relevant objectives <i>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>															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 80%;"><i>Relevant Objective</i></th> <th style="width: 20%;"><i>Yes/No</i></th> </tr> </thead> <tbody> <tr> <td>a. the efficient and economic operation of the pipe-line system to which this licence relates</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>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</td> <td style="text-align: center;">N/A</td> </tr> <tr> <td>c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence</td> <td style="text-align: center;">No</td> </tr> <tr> <td>d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers</td> <td style="text-align: center;">No</td> </tr> <tr> <td>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</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>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</td> <td style="text-align: center;">Yes</td> </tr> </tbody> </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	Yes	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	N/A	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	No	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	Yes	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
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<i>Relevant Objectives to be better facilitated:</i>															
Likely impact on environment? <i>How this proposal will, if implemented, impact on greenhouse gas emissions?</i> N/A															
Implementation issues including impact on your systems															

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This would depend on whether the industry agreed on a format by which these requests are submitted. If the agreed format for submitting these requests was via csv files, then FPL would have to amend their systems to accommodate this. An estimated lead time of six months would be required to allow this amendment.

Additional Information and Comments

As per previous discussions & correspondence regarding this subject, FPL would ask that the mod proposal recognises that “Voluntary Withdrawals” are only applicable for withdrawals associated with isolations and that the pipeline operator may insist that they have to undertake the isolation. The latter statement should be specified in the Operator’s individual network code.

It also needs to be clearly understood that an isolation required a method of terminating the supply so that the potential for gas to be offtaken could no longer take place, i.e., clamping, dropping a plunger in an upright & throughpiece, cutting off the service in the ground.

As long as these topics are indicated in the mod proposal so that they can be clearly understood by others who may refer to this topic in the future, then FPL would have no objection to the proposal.

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