

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	13 <sup>th</sup> September 2010
<b>Reference</b>	iGT028 Modification Proposal Consultation
<b>Title</b>	Remove the Must Read process for annually read sites
<b>Respondee</b>	Fulcrum Pipelines Limited
<b>Position on the Modification</b>	Do not 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 too, 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>No</b>
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	<b>No</b>
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	<b>No</b>
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	<b>No</b>
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	<b>No</b>
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	<b>No</b>

*Relevant Objectives to be better facilitated:*

### Likely impact on environment?

*How this proposal will, if implemented, impact on greenhouse gas emissions?*

This proposal could have a negative impact, as by implication the AQ review and therefore the NEXA review will not be using relevant data. The RbD process again could be negatively impacted due to the smearing of the missing data, and therefore the industry is not viewing accurate information when making energy decisions.

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### **Implementation issues including impact on your systems**

Systems, and process would require amendment, an impact assessment has not been made to understand if this is significant.

### **Additional Information and Comments**

We think we understand the background to this proposal, however perhaps the focus should be on the industry making the current processes work effectively and efficiently, rather than removing the obligations. Therefore perhaps this could be an agenda item for the IGT Shipper Workgroup, so as an industry group we can work through the issues and to understand them in more detail and assist to improve the consistency and application of the existing requirements by all the users and operators.

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