

iGT UNC / iGT INC Consultation Response

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| Date | 5th October 2010 |
| Reference | iGT031V Modification Proposal Consultation |
| Title | Amendment to AQ values present within the CSEP NExA Table to take account of revised Seasonal Normal Data (SND) |
| Respondee | Jenny Rawlinson GTC, GPL, UGI |
| Position on the Modification | 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 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 | 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 | 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 |

Relevant Objectives to be better facilitated:

Likely impact on environment?

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

N/A

Implementation issues including impact on your systems

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This modification proposal is not supported for the following reasons:

- There is currently a Review Proposal (also raised by ScottishPower) to review the CSEP NExA table values. We believe that, to consider amendments to the table values now and then again very shortly, is neither efficient nor economic. Both instances would require system changes. We would suggest that there is one collective review of, not only the table values, but also a review to consider an appropriate and robust process going forward for reviewing and amending the CSEP NExA table values.
- It is not clear from this modification proposal what supply point connections any new values would be applied to. There are certain lead times prior to connection, including quotations currently in the pipeline, and this modification proposal does not give clarity to either the implementation or transition of any new values.
- We would challenge the appropriateness of new values being applied to the iGT New Connections market which relate to analyses carried out on established GDN supply points. It may be more appropriate to conduct a similar exercise on iGT supply points to determine like-for-like analyses.

Additional Information and Comments

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