

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	7 <sup>th</sup> December 2012
<b>Reference</b>	iGT050 Modification Proposal Consultation
<b>Title</b>	iGT & Shipper Metering Communications Ancillary Document
<b>Respondee</b>	Jenny Rawlinson GTC
<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 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	
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	Yes
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	
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	

\* 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?

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

**None**

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### Implementation issues including impact on your systems

Extensive system changes to include both RGMA and UK Link files and their validation.

### Additional Information and Comments

GTC Chaired the workgroup from which this Ancillary Document was produced. The work carried out under this group was very comprehensive, with input from metering data experts within each organisation. However, whilst the process and files included in the document meets the remit of the workgroup, GTC believes that both are more extensive than necessary at this time when there are other comprehensive system changes required to implement directed modification proposals and those soon to be directed (Smart). At any other time the industry could otherwise support this but with the likely implementation of iGT039 (iGT Agency Services) where Xoserve will be carrying out certain SPA activities on behalf of the iGTs, including full RGMA communications, the benefits of such a comprehensive change will be short-lived.

GTC has proposed a simpler but equally effective solution within iGT050A. These files are being used between GTC and all shippers carrying out third party metering activity on GPL networks and the group was made aware of these both at the beginning and end of its' work.

GTC also has slight concerns that the validation within iGT050 is incomplete and may lead to parties building their systems to varying specifications, similarly to the suite of Meter Read modifications directed to be implemented in February 2010, where, still, not all parties have implemented the full proposals.

An internal comparison carried out by GTC indicates that development costs for iGT050 would be double that of those for iGT050A.

GTC cannot support this modification proposal for these reasons.

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