

iGT UNC / iGT INC Consultation Response

Date	11 th April 2014
Reference	iGT054/A/AA Modification Proposal Consultation
Title	Alternative Profile for Pre-Payment Smart Meters
Respondee	Andrew Margan, British Gas
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	
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	
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	
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	
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

No positive impacts identified

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Likely impact on environment?

None

Implementation issues including impact on your systems

None

Additional Information and Comments

Within the Small Supply Point (SSP) market there are traditionally prepayment and credit meter customers. Smart meters are also being introduced. Modification IGT054/A/AA seeks to provide IGT data to Xoserve to correct an over-allocation of energy within the prepayment meter market.

Whilst British Gas supports the principle of accurate cost allocation and we have sympathy with the proposals, we do not believe it will improve cost allocation within the SSP market, and will in itself introduce a further misallocation to groups of other SSPs.

Because of the risk the change creates and the risk that should the industry experience a mild winter, the resulting unintended consequence will be for PPM customers to pay more into the scheme; we do not support any of the proposals.

If requested to indicate a preference, British Gas' would suggest IGT054AA, because it is the simplest and cheapest solution and captures most of the intended prepayment meters.

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