

iGT UNC / iGT INC Consultation Response

Date	11/03/14
Reference	iGT057 Modification Proposal Consultation
Title	Creating CSEP NExA Ancillary
Respondee	Andrew Margan British Gas Trading
Position on the Modification	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	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:

This change seeks to place historic and current CSEP NExA tables into a single IGT UNC ancillary document.

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British Gas believes this modification, will support all industry parties to identify current and historic values more easily and reduces the risk of the wrong values being applied.

We believe that to hold the relevant CSEP NExA values in a single document is a more proficient use of industry resources, rather than having the information scattered in various locations or held within many historic documents.

We are aware that other IGT UNC and UNC mods are seeking to update the CSEP NExA values to better align the values to customer usage. British Gas considers that moving the excising table into an ancillary document will make the updating of the CSEP NExA table more efficient and simple moving forward.

Also in the future, we believe this change could have an unintended benefit when aligning the IGT UNC and the main UNC. Both codes hold the current CSEP and NExA table, although we believe going forward both documents could point to the new ancillary document, making it possible to change a single document, rather than multiple codes, which could better align the gas codes.

Therefore on balance relating to the cost of the change, verses the benefit to the industry of easier to find and easier to update tables, British Gas supports Modification IGT057.

Likely impact on environment?

None identified

Implementation issues including impact on your systems

This change does not have an impact to systems.

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