

iGT UNC / iGT INC Consultation Response

Date	13 May 2013
Reference	iGT047 DMR Consultation
Title	Inclusion of data items relevant to smart metering into existing industry systems
Respondee	David Speake British Gas
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	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	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	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
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	No

* Regulation 2009/715/EC of the European Parliament and of the Council of 13 July 2009

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Registration systems need to be adapted in a number of ways to cater for smart meters, as required by the suppliers' licence obligations. All suppliers will need to cater for this amended processes to ensure that change of supply can occur as efficiently or more efficiently as it does today. All suppliers are impacted equally by this change, which facilitates competition in the market in allowing greater transparency of information around smart meters to be shared with all participants.

We note that this is one of many potentially significant changes that we are expecting to be made to industry arrangements to secure the benefits of smart metering for our customers. British Gas will be contributing to all further development work in this area.

Likely impact on environment?

None

Implementation issues including impact on your systems

We foresee no significant implementation issues for this essential modification. Timescales must be aligned so far as is possible with those of UNC 430, although we note that systems development requirements are somewhat different owing to varying file formats and business processes.

Additional Information and Comments

British Gas fully supports the proportionate approach suggested for the back-population of particular data items. We do not see the need for a formal industry-wide approach where only a minority of shippers are impacted at a few thousand supply points. We look forward to a co-operative bi-lateral approach with each iGT in populating these data items when the time comes.

We recognise the alignment work being undertaken by iGTs against a backdrop of limited perceived benefit and will be happy to continue discussions in support of a mechanism for shipper funding of interface set-up costs for data hand-offs. There is probably a need somehow to formalise any agreement in funding arrangements, and we must be clear that what is agreed for the purposes of this modification will not necessarily be appropriate for any other funding requirements (such as Project Nexus).

We would urge the baselining of the ancillary document as soon as possible, and would appreciate regular updates or engagement from iGTs on this, to assist our internal development programme.

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