

iGT UNC / iGT INC Consultation Response

Date	13 th May 2013
Reference	iGT047 DMR Consultation (Delete as required)
Title	Inclusion of data items relevant to smart metering into existing industry systems
Respondee	Adam Pearce ES Pipelines Ltd
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	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	
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:

Objective D

Gas suppliers will have a licence obligation to install smart metering systems (SMS) in homes from 2014. A number of the new data items proposed in this modification are

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designed to facilitate switching between suppliers where a SMS is present at a property, thus facilitating effective competition between shippers and suppliers.

Likely impact on environment?

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

None.

Implementation issues including impact on your systems

The implementation of a new file flow that will be used on a regular basis is a relatively significant system change. ESP supported the principle of developing the Ancillary Document in parallel to the modification going through the mod process and, as the proposer of the mod, hope that parties will continue to contribute to the document's development so that a suitable technical solution can be finalised prior to an Ofgem decision on iGT047.

Additional Information and Comments

While shippers have agreed to the principle of covering the cost of the iGTs' communication gateways (be it IX, DTN or a combination), the mechanism for how these charges can be apportioned and recovered by the party(ies) providing the services still needs to be ascertained. ESP's support this modification on the assumption that the appropriate funding mechanism is in place.

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