

iGT UNC / iGT INC Consultation Response

Date	14 th December 2012
Reference	iGT050 Modification Proposal Consultation
Title	iGT & Shipper Metering Communications Ancillary Document
Respondee	Gethyn Howard Independent Pipelines Limited
Position on the Modification	Do 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>
<p>a. the efficient and economic operation of the pipe-line system to which this licence relates</p> <p><i>When compared to the lower implementation cost for IGT050A IPL does not believe that objective a can be fulfilled.</i></p>	N/A
<p>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</p>	N/A
<p>c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence</p> <p><i>Yes, this modification will better enable IGTs to comply with SLC31 2(a) in so much as the modification allows for a standard method for amending meter point data.</i></p>	Y
<p>d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers</p> <p><i>Yes, the modification will better facilitate timely and accurate amendments to metering data which should reduce the volume of Shipper queries. Accurate metering data will also allow for more meter reads to be accepted consequently increasing the accuracy of gas allocation.</i></p>	Y
<p>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</p>	N/A
<p>f. so far as is consistent with sub-paragraphs (a) to (e), the</p>	Y

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<p>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</p> <p><i>Yes in so much as the modification would introduce a standard set of flows and processes for all parties to use.</i></p>		
<p>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</p>	N/A	

* 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?

N/A

Implementation issues including impact on your systems

Though IGT050 facilitates a number of the relevant objectives IPL holds concerns with IGT050. Though it is a thorough solution, IGT050 will require extensive systems developments to implement. In a period of mass change where developments will shortly commence for other areas such as smart metering and Single Service Provision, IPL does not believe that the IGT050 solution when compared to the simpler IGT050A solution enables IPL to support objective A. It is likely that any forthcoming changes will be short lived with an anticipated implementation for Single Service Provision in 2015 at which point IGTs (via the single service agent) will utilise the full suite of RGMA and UK Link flows. As such IPL wishes to minimise the cost and further stranded costs on its operational systems up to this point and as such is not able to support this modification when compared to the other alternative solution.

Additional Information and Comments

In terms of cost, IPL believes that the cost of IGT050 will be in excess of double that of IGT050A.

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