

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	06/12/2007
<b>Reference</b>	IPL QPL 035 Consultation
<b>Title</b>	Supply Point Confirmation
<b>Respondee</b>	Lorraine McGregor, ScottishPower Energy Management Limited (SPEML)
<b>Position on the Modification</b>	Do not support Modification

### Facilitation of the relevant objectives

SPEML do not believe that the re-introduction of section G:2 and G:4.3.10 from the IPL Network Code version 3.4 will improve the efficiency, accuracy and timeliness of the change of supplier process, as stated within this Modification. If anything it will be less efficient, since the re-introduction of the whole of section G:2 and G:4.3.10 deviates from the main Network Code. This is a core process, where the iGT processes should be aligned.

### Additional Information and Comments

This Modification seeks to address one issue, to 'oblige users to submit a T03 file in response to a T02 file...' and it does not, therefore, seem relative that the whole of Section G:2 and G:4.3.10 from IPL's historic Network Code is inserted to their current Short Code. We believe the intention of this Modification and the solution, being presented by IPL and QPL, are not equitable.

To clarify, SPEML do not have any issue with IPL and QPL attempting to obligate parties to submit a T03 file in response to a T02 file (we currently do this), but we do not believe this Modification would solely achieve this. If this was to be implemented it would result in all iGTs, but IPL and QPL, following the processes and procedures currently contained within the main iGT Network Code. Consequently, Shippers would also, to a further extent than at present, have to follow different processes and procedures. This is not in the interest of Shippers or end consumers.

Further section G:2 replicates some of the information that already exists in the main iGT Network Code, for example, definitions of defined terms. Duplicate clauses in an iGT's Short Code and the main iGT UNC are not required and it is not something SPEML welcome.

For the reasons above, SPEML do not support this Modification.

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