

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	20 <sup>th</sup> April 2012
<b>Reference</b>	iGT045 DMR Consultation
<b>Title</b>	Meter Supply Point Pressure
<b>Respondee</b>	Gethyn Howard on behalf of Independent Pipelines Limited & Quadrant Pipelines Limited
<b>Position on the Modification</b>	<del>Support Modification</del> <del>Qualified support for Modification</del> Do not 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.

Relevant Objective	Yes/No
a. the efficient and economic operation of the pipe-line system to which this licence relates	N
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	N
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	N
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	N
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	N
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	N
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	N

\* 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?

**iGT UNC / iGT INC Consultation Response**

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

**N/A**

**Implementation issues including impact on your systems**

IPL hold a number of concerns with this proposal. Firstly, the proposal would seem to replicate existing obligations with regards to provision of such data. Secondly, the proposal if implemented would require extensive systems changes to implement with no form of cost recovery. Thirdly there does not appear to be an equivalent request for GDNs to provide this information to Shippers.

**Replication of existing industry procedures:**

Under MAMCoP the MAM as “*the person proposing to carry out work in relation to a gas fitting*” is entitled to receive as part of the planning process “*all the relevant information regarding the provision and subsequent operation of the meter installation*”. Thus, the GT1 procedure has been developed to provide such information. Placing an additional obligation on IGTs to provide this information to other parties is an inefficient use of IGT resource and consequently does not promote the efficient and economic operation of the pipe-line system. This is particularly relevant as such information could be transferred between the Supplier and their Metering Agent direct without additional IGT involvement.

**Extensive systems changes required:**

The information required as part of the GT1 pressure information request is not readily available for systemised provision to Shippers. In order to add such information to the portfolio extract, a major backfill exercise will be required in our Shipper facing systems which will be both time and resource intensive. Consequently, IPL holds concerns that the associated costs will fall solely on itself and will derive no benefit from the proposal. IPL would therefore recommend that the MAM and Supplier directly identify a method of transferring the required data between themselves rather than placing duplication of effort and additional cost on IPL as the IGT. It would therefore seem inappropriate to place an IGT to Shipper obligation under the Network Code as the provision of information can be carried out by parties outside of the Network Code.

**iGT UNC / iGT INC Consultation Response****No equivalent request for GDNs to provide this information:**

At the time of responding to the DMF, there does not appear to be an equivalent modification raised to the UNC. IPL is concerned why this is the case as IGTs collectively only account for a small percentage of the connected gas market and already utilise the GT1 and GT2 process which mirrors the process used by GDNs. Coupled to this, there has been no clear indication of the benefits to Shippers from this proposal. The relevant objectives are claimed to be achieved on the basis that Shippers “*will not incur additional costs for abortive works because different requirements are needed for sites with a higher pressure*”. In IPL’s view this does not appear to be sufficient justification for the implementation of the proposal. There are already industry requirements and processes in place for the provision of such information and it would appear that the additional Supplier costs are borne from the failure of utilising such existing procedures. In IPL’s view, placing additional obligations and costs on IGTs should not be used as a remedy for such failures.

**Additional Information and Comments**

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