

iGT UNC / iGT INC Consultation Response

Date	11 th November 2011
Reference	iGT040 DMR Consultation
Title	Amendment to AQ Values present within the CSEP NExA Table
Respondee	Gethyn Howard Inexus on behalf of Independent Pipelines Limited & Quadrant Pipelines Limited
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	n/a
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/a
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	n/a
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	Y
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/a
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/a

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

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Additional Information and Comments

IPL is supportive of the proposal to implement revised NExA values on the understanding that under RPC, the revised values will only apply to sites contracted going forwards from the date of implementation.

IPL's internal analysis shows that lower consumption is more evident in recently built properties than in older housing stock. This suggests that that the reduction in AQ is more attributable to the improved thermal and boiler efficiency of new housing stock than perhaps to consumers reducing their consumption in response to rising energy costs.

IPL notes that any implementation date must be aligned with UNC proposal 0392 and as the first choice proposed implementation date of 1st October has already passed, IPL would be supportive of the change being implemented in the next release of the IGT UNC following Authority decision.

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