

Consultation Response

iGT078: Adding an Ancillary Document to the IGT UNC for the new connections process

Responses invited by: 08 MAR 2016

Respondent Details

Name: Nicky Rozier

Organisation: Brookfield Utilities

Support Implementation ☒Qualified Support ☐Neutral ☐Do Not Support ☐

Please briefly summarise the key reason(s) for your support / opposition

Brookfield Utilities fully supports the modification and are happy with the changes made as a result of further discussions held at the modification workgroup.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

Yes, we agree this modification qualifies for self-governance.

Please state any new or additional issues that you believe should be considered

We feel the issues specified have been sufficiently incorporated in the revised version of the modification.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree this modification facilitates both Objectives d) and f).

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

As previously stated in our initial response, Brookfield would experience some costs associated with system changes but ongoing costs would not be increased going forward.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

Brookfield will require minimum six months implementation time but would welcome a longer implementation period. We recognise implementation will not be pre-nexus but if approved at the March Panel we will have barely 6 months to implement in line with SSP. If approved later there will be less than 6 months.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

We are satisfied the legal text meets the requirements of the intent of this modification.

Further Comments

Is there anything further you wish to be taken into account?

Brookfield Utilities notes the concerns that SSE have raised in their initial consultation response. However, we disagree with the suggestion that there could be a potential competition issue. In the same way that the iGT would not expect to view the shipper/developer contract but would take the confirmation of the PSR as supporting that position, we do not consider it efficient and economical for the iGT to need to provide the documentation referencing that it has been nominated by the developer to the role of MAM. In addition, there have often been generic discussions between the iGT and Shipper prior to the confirmation stage regarding MAM responsibility, particularly with smart meter installations.

We do, however, accept that the shipper would undoubtedly wish to reconcile the MAM ID and reject where they dispute the responsibility. The proposal within iGT078 allows for this.

Responses should be submitted by email to iGTUNC@gemserv.com