

iGT UNC / iGT INC Consultation Response

Date	04/07/11
Reference	UGI037/GTC0346/GPL045 Modification Proposal Consultation
Title	Clarification of I&C RPC Migration Dates for I&C Sites which have an Ofgem RPC derogation
Respondee	David McCrone - ScottishPower Energy Management Ltd
Position on the Modification	Qualified support for 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	
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	
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	Yes
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	
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	Yes

Relevant Objectives to be better facilitated:

We agree with the proposer that this change will enable Shippers to see what charging arrangements are in place for a site for which they are incoming Shipper, and as such, reflect this in any contractual arrangements that are established.

Likely impact on environment?

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

None.

Implementation issues including impact on your systems

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The modification proposal refers to an “I&C site” as having an active derogation from migration to RPC charges. I&C is not a defined term within the iUNC. The only reference to this within the iUNC is within row 34 of Appendix G-2 “Portfolio Extract File Format” which states a site will be marked as “D” Domestic or “I” Non Domestic. It is unclear whether this change intends to use this distinction. For us to properly assess the impact of this change we would need to see the proposed legal text and the definition of “I&C” used. Until this is done we can only offer qualified support for the proposal.

Additional Information and Comments

The proposal concerns only I&C sites with an RPC derogation. It may be more straight forward then for the RPC migration date to be made mandatory for all supply points (including those for which it has passed). This would remove the need for the iUNC to define what it means by “I&C”. We acknowledge that this may increase the size of the change and suggest that this is discussed within the workgroup.

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