

iGT UNC / iGT INC Consultation Response

Date	5 th April 2011
Reference	iGT034 Modification Proposal Consultation
Title	Designation of existing AQ procedures document as an Ancillary Document
Respondee	(Please enter the name of the company you are replying on behalf of) ScottishPower Energy Management Ltd (SPEML)
Position on the Modification	Qualified Support

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	
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	Y

Relevant Objectives to be better facilitated:

We agree with the Proposer that the change promotes efficient governance.

Likely impact on environment?

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

None identified.

Implementation issues including impact on your systems

No system impacts identified or immediate implementation issues. However, while we are supportive of the change we do have some concerns over what would be determined

iGT UNC / iGT INC Consultation Response

as “minor changes”. We think it might be prudent to determine what the test for “minor changes” would be. Given the material nature of the AQ Review it is essential that any change that will impact Parties is consulted upon. For example, a change to a date may be seen as fairly ‘minor’ in nature but in reality this could have a major process/system impact. We would be concerned of the Panel having too much power to take decisions without full engagement with the wider industry/impacted Parties.

Additional Information and Comments

We recognise the issue the Proposal has been raised to resolve and agree that the ‘AQ Procedure’ document should have a formal status. We also agree with the name change of the document to ‘iGT AQ Review Procedures’.

By governing the document via the ancillary route we agree this will provide a more efficient change process for “minor” amendments and therefore support the proposal. However, per our comments above we believe the test for “minor changes” has to be defined to give comfort that the Panel cannot unduly amend the document.

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