

iGT UNC / iGT INC Consultation Response

Date	30th January 2013
Reference	iGT050 DMR Consultation iGT050A DMR Consultation
Title	iGT050 - iGT and Shipper Metering Communications Ancillary Document iGT050A - Third Party Metering Activity and MAM ID Communication
Respondee	Anne Jackson SSE Supply
Position on the Modification	Do not support Modification iGT 050 Do not support Modification iGT 050A

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	
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	

* Regulation 2009/715/EC of the European Parliament and of the Council of 13 July 2009

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No additional comments to make

Likely impact on environment?

No additional comments to make

Implementation issues including impact on your systems

Additional comments:

On the assumption that iGT's will use a single service provider, we have noted that the life of the systems developed for these modifications could be extremely short which will impact the cost benefit case for both modifications. According to respondents Modification 050 could be implemented within 18 months and modification 050A within 6 to 12 months. The systems developed might only have a life of up to 2 years assuming the delivery of NEXUS in 2015.

Consequently SSE would prefer to see the full implementation of RGMA at the earliest opportunity (as proposed in SPAA modification 12/227), rather than the implementation of either of the iGT modifications 050 or 050A.

RGMA would put the control of meters fitted back to suppliers and their customers (and not shippers or the transporters and supplier's customers, as the current processes and the two modification proposals continue to support). We believe that full RGMA would improve validation and data quality for up to 2 years prior to the implementation of NEXUS and that the migration of metering data should be easier leading to further cost benefits.

We believe that the majority of shippers already have systems to manage RGMA flows so would not be impacted significantly. iGT's would have to develop systems, but it is noted that as iGT's have metering and transporter businesses, only the systems developed for the transporter elements of the RGMA changes would become obsolete if iGT's were incorporated within NEXUS.

Additional Information and Comments

Additional comments:

Suppliers have borne the administrative burden of managing third party meters on iGT networks in recent years and ultimately the cost of this has been passed to all customers. It is unclear to us why iGT's have not embraced RGMA since its introduction in 2004 and we are concerned that this could continue until 2015, when iGT's may be incorporated in to NEXUS.

For an accelerated meter exchange programme (such as Smart) it would be preferable for suppliers to use the same systems and flows for all the GT's to assist with efficiency and

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data integrity. Other consumers impacted are those requiring pre-payment meters on iGT networks, as some suppliers are using Third Party MAMs to supply these meters as well.

We note that the legal text for Modification 050A requires Suppliers to update GT's with asset discrepancies that are identified. In these circumstances and if insufficient meter details are known then we would instruct our MAM to obtain or provide the corrected details where the meter was provided by a third party MAM. However when the meter has been fitted by the iGT we are unable to instruct the MAM as we do not have a contract. We would therefore like to see the legal text amending to recognise this. As suppliers we would provide the meter information we have, but if deemed insufficient and a site visit is required then the GT would be required to visit the site to obtain the correct details (for meters that it has fitted) and the legal text should be amended to reflect this. We note that the legal text has added an additional responsibility for validating the meter data and we believe MAMs (both third party and iGT) have some responsibility in this area.

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