

iGT UNC / iGT INC Consultation Response

Date	7 th February 2008
Reference	iGT016 Consultation
Title	Submission of More Frequent Cyclic Meter Reads
Respondee	Heidi Martin, RWE npower
Position on the Modification	Support Modification

Facilitation of the relevant objectives

We believe that this modification proposal will facilitate "effective competition between relevant shippers" as it is envisaged that the acceptance of additional reads will secure the allocation of gas costs to the relevant parties thus reducing the risk to the RbD community.

Clarification of defined terms will facilitate the "promotion of efficiency in the implementation and administration of the Uniform Network Code" as it will allow parties to fully understand their respective obligations.

Additional Information and Comments

RWE npower supports the implementation of this modification proposal, as it believes it will help to improve the integrity and quality of data within the iGT market.

With the growth of the iGT market, coupled with advances in metering technology we believe that it is timely to review the current iGT UNC provisions. With the energy sector working towards the ability to read meters remotely it would seem plausible that there will be an increase in meter reads available for submission to the Operators. We believe that this modification proposal provides clarity to the existing rules, which will help existing participants and new entrants with the management of meter readings.

Extending the obligations to allow the acceptance of additional reads will allow Operators to increase the frequency of I&C Reconciliations to Large Transporters which in turn will ensure the correct allocation of gas costs to Users and in so doing reduce the risk to the RbD community.

It will also aid the management of AQ's for Smaller Supply Points as an increase in meter reading history stored by the Operators will filter through to the calculations for the AQ Review making them more accurate; ultimately make the AQ values in the CSEP NExA table more reflective of actual consumption. Furthermore, an increase in meter reading history stored will assist Operators when they are required to estimate reads.

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