

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	<b>28/02/2012</b>
<b>Reference</b>	<b>iGT043 DMR Consultation</b> (Delete as required)
<b>Title</b>	Consolidation & Alignment of Invoice Data
<b>Respondee</b>	Cher Harris SSE Pipelines
<b>Position on the Modification</b>	<b>Qualified support for Modification</b>

### 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	N
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	N
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	N
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	N
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	N
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	N
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	N

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

*Relevant Objectives to be better facilitated:*

### Likely impact on environment?

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

**None**

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### Implementation issues including impact on your systems

This proposal has a significant impact on our system as not all proposed new data items are currently held in our billing system. Furthermore, the business case for the GT to make these changes has not been stated clearly - only the benefits to the Shipper have been documented. For example, where the values are calculated or derived, it is not clear why it is considered more efficient for the GT to calculate the values than for the Shipper to.

We will require a minimum of 6-9 months from Authority Decision to implement the associated system changes.

### Additional Information and Comments

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