

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	<b>06 March 2012</b>
<b>Reference</b>	<b>iGT043 DMR Consultation</b>
<b>Title</b>	<b>Consolidation and alignment of invoicing data</b>
<b>Respondee</b>	<b>Trevor Peacock, Fulcrum Pipelines</b>
<b>Position on the Modification</b>	<b>Do not support 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	<b>No</b>
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	<b>No</b>
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	<b>No</b>
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	<b>No</b>
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	<b>No</b>
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	<b>No</b>
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	<b>No</b>

\* 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?*

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### Implementation issues including impact on your systems

**Fulcrum could add the additional fields / data into the invoice backing data but in order to do this we would have to carry out some development and amendment to our systems. But as the only beneficiaries seem to be the Shippers then we feel that the implementation of this mod should be funded by the shippers.**

**The development work on our systems to accommodate this mod would take approx. 3 – 6 months.**

### Additional Information and Comments

**Fulcrum do not feel that this modification is required as this information is already available to the Shippers as long as the invoice backing data meets the requirements of the iGT UNC Appendix G-1.**

**Some of the results may need the understanding of the RPC document and may need the parties concerned to carry out relevant calculations in order to be able to extrapolate the information but the Shippers could do this just as well as the iGT's do using the information that is available to them.**

**Therefore, it would seem that the provision of this data removes some of this effort for the Shippers and as such would only benefit them.**

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