

iGT UNC / iGT INC Consultation Response

Date	16 th January 2013
Reference	iGT046 Modification Proposal Consultation
Title	Revision to the Modification Rules
Respondee	Andrew Margan, British Gas
Position on the Modification	Support Modification

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	Yes
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

Relevant Objectives to be better facilitated:

Likely impact on environment?

None

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Implementation issues including impact on your systems

None

Additional Information and Comments

Following developments at the Workgroup British Gas supports Modification IGT046 which will as far as possible achieve the aims of aligning the process and timescales to the UNC.

Concerns were raised that this proposal may be impacted by Ofgem's CGR2 work. Whilst we support CGR2, BG believes these changes, (e.g. self governance) can be added to the IGT UNC at a later date with little to no expense to the industry.

Therefore because aligning UNC and IGTUNC timings is important to future modifications such as Smart Metering, Nexus, Single Service Provision, and that introducing Self Modification can be added later BG supports the implementation of IGT046 proposal.

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