

## iGT UNC / iGT INC Consultation Response

<b>Date 16<sup>th</sup> January 2012</b>	
<b>Reference</b>	<b>iGT 046 DFMR Consultation</b>
<b>Title</b>	<b>Revision to the Modification Rules</b>
<b>Respondee</b>	<b>Steph Shepherd, RWE npower</b>
<b>Position on the Modification</b>	<b>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	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	Y
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?*

## iGT UNC / iGT INC Consultation Response

None

Implementation issues including impact on your systems:

This modification will not impact our systems.

Additional Information and Comments

RWE npower is in support of this modification. We believe that it will provide consistent management of change across both the iGT UNC and the UNC and therefore remove the risks of inconsistencies in the treatment of Customers/end Users regardless of their Transporter.

The suggested changes to the text of Part L, of the iGT UNC are consistent with the intent of the proposal, and we support the inclusion of the Proposers contact details. This is consistent with other codes, (Eg.SPAA) and although there is some risk associated with the publication of the details on an open website, the benefits of being able to approach the Proposer, we believe, outweigh those risks.

We also note the change in timescales for sections 10.1 and 10.2 and offer support the code administrator in delivering the subsequent changes to processes where necessary.

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