

iGT UNC / iGT INC Consultation Response

Date	7 th November 2012
Reference	iGT049 Modification Proposal Consultation
Title	AQ review amendment to tolerance for SSP sites
Respondee	Trevor Clark E.ON
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	Yes
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	Yes
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	Yes
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	Yes
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	No
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	No
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	No

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

Relevant Objectives to be better facilitated:

This proposal better facilitates Relevant Objectives (a) to (d) by allowing Pipeline Users to raise AQ amendments that more accurately reflect the consumption of their customers. This in turn should improve accuracy in the allocation of costs and help deliver effective competition.

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Likely impact on environment?

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

None

Implementation issues including impact on your systems

This Modification would have no impact on our systems.

Additional Information and Comments

E.ON is supportive of this Modification as it will allow Pipeline Users to submit AQ amendments that better reflect actual customer consumption and changes in circumstances, particularly as domestic customer demand is currently on a downward trend. We anticipate a reduction to reconciliation by difference (RbD) costs should also be delivered by this change.

We believe Pipeline Operators will also benefit from increased accuracy of AQ values; this should aid pipeline capacity planning as well as the calculation of transportation, energy balancing and reconciliation charges.

We note that this change would bring the iGT UNC threshold in line with the existing UNC threshold, this provides further benefit to Pipeline Users by allowing them to align procedures across both Codes.

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