

iGT UNC / iGT INC Consultation Response

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| Date | 14/12/12 |
| Reference | iGT050 Modification Proposal Consultation |
| Title | iGT and Shipper Metering Communications Ancillary Document |
| Respondee | David McCrone, ScottishPower Energy Management |
| 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 | 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 | |
| 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:

We support this proposal as it will introduce a consistent approach to updating iGTs operating in their role as Pipeline Operator of changes to assets on their network. It will also more closely align with the existing processes already employed for updating the Large Transporters through the use of RGMA flows. We would prefer for iGTs to be fully

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compliant with the RGMA Baseline (in their role as GT and MAM) but recognise this as an improvement on the current position and a move in that direction.

The Pipeline Operators are required by their licence to hold information relating to the supply points on their network. By creating a set of standard file formats and timescales by which this information is passed between industry parties this requirement can be met, and the pipeline system operated, in a more efficient way. This will better facilitate relevant objectives (b), (c) and (f).

This proposal will provide shippers/suppliers with more confidence that the metering information provided by an iGT on change of supply is accurate. This reduces the time and cost of investigating cases where data is missing or incorrect, and the subsequent correction of billing, etc. This reduction in the costs incurred by shipper/suppliers will help facilitate effective competition and therefore further relevant objective (d).

Likely impact on environment?

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

None.

Implementation issues including impact on your systems

This change would have material impacts on our systems and would require a minimum of 6 months development after a decision to implement.

We note that there are still some areas where iGTs and shippers may need to discuss implementation and ensure a consistent interpretation of the requirements. We would expect parties could do this in a pragmatic way following any decision to implement, e.g. through the iGT Shipper workgroup.

Additional Information and Comments

We have noted a couple of typos in the document which should be changed as non material changes.

- Section 2.4.3, there is a row with “” only, suggest this is a typo
- Section 2.6.3, there is a row with “ only, suggest this is a typo

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