

iGT UNC / iGT INC Consultation Response

Date	18/01/2013
Reference	iGT051 Modification Proposal Consultation
Title	Amendment of IGT AQ Review Procedures document - Addition of additional reporting
Respondee	Trevor Peacock - Fulcrum Pipelines
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	Y
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	Y
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	Y
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	Y
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/A
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/A

* 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?

N/A

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Implementation issues including impact on your systems

N/A

Additional Information and Comments

Fulcrum Pipelines support this proposal to undertake an annual exercise to collate the AQ values associated with the AQ Review program. This will then generate a version of the NExA table that can be reviewed by the industry and considered for implementation.

If one or more parties determine that the version of the NExA table is sufficient to warrant an official change then they would submit a modification proposal for the calculated AQ values to be implemented as the new NExA table.

The only concern that Fulcrum Pipelines have with reducing the NExA values relates to the design of the networks. There is a potential for some of the pipework designed for new networks to be undersized if the NExA AQ is used in the design calculations.

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