

iGT UNC / iGT INC Consultation Response

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| Date | 18/09/2013 |
| Reference | iGT052 DMR Consultation |
| Title | Revision to the Modification Rules in Response to CG2 |
| Respondee | Zoe Murphy - npower |
| 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 | No |
| 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 | No |
| 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 | No |
| 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 | 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 | No |

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

Relevant Objectives to be better facilitated:

Objective C:

npower believes that implementation of this proposal, will facilitate iGT UNC Parties adhering to their licence obligations, imposed by Ofgem week commencing 3 June 2013.

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Objective F:

npower believes this Proposal will improve the iGT UNC governance arrangements and provide a more consistent governance approach across industry codes.

This will deliver benefits to all industry parties in better planning, organisation and implementation of industry change, especially where changes are required across several codes, such as smart metering.

Likely impact on environment?

None

Implementation issues including impact on your systems

None Identified

Additional Information and Comments

As a result of this Proposal, npower would like the governance and chairing of IGT UNC development groups to be more consistent with our other industry codes, whereby the Code Administrator provides secretariat services and venues for meetings. This will help to support the expected increase in the volume of change as the rollout of Smart Metering gathers pace. A self governance route will also help this.

Changes to the modification process are also welcome and will help keep alignment across the UNC and iGT UNC.

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