

## iGT UNC Consultation Response

<b>Date</b>	16/05/2014
<b>Reference</b>	iGT053 DMR Consultation
<b>Title</b>	iGT053 - Introduction of annual updates to the AQ values within the CSEP NExA table
<b>Respondee</b>	Scottish Power Energy Retail - Maria Hesketh
<b>Position on the Modification</b>	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	
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	
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	
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:*

### Likely impact on environment?

N/A

### Implementation issues including impact on your systems

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N/A

### Additional Information and Comments

iGTs are required to undertake this reporting of performance in January following the completion of the AQ Review within the previous Gas Year. IGT051ANC has already specified reports to allow iGTs to summarise the aggregated AQ movements by house type and geographical area.

Currently, AQ values contained within the CSEP NExA table are set and as such are not updated on a yearly basis in line with the AQ review iGT051ANC resulting in what we believe to be an inconsistent system.

Scottish Power is keen to have implemented a process that completes the updating of the current AQ table with the revised AQ table following the review.

We believe that currently there are significant differences in values to those presently listed for use in the CSEP NExA table as a result of the table not been updated over a three year period and that, the adjustment required to bring the values in line in may be round 10% as reported by Demand Estimation Sub Committee (DESC)

We believe that accuracy of the AQ table will benefit the customer through more cost reflective charging in that overall pricing will be more reflective of actual consumption. I believe the industry as a whole is currently driven to provide customers benefits of cost reflective charging and that this Modification reflects that ideal.

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