

Consultation Response**iGT062AA: Independent Secretariat Services for Modification Work Groups**

Responses invited by: 16.09.2014

Respondent Details

Name: Kish Nundloll

Organisation: ESP

Support Implementation Yes

Please briefly summarise the key reason(s) for your support / opposition

ESP supports both iGT062 and iGT062AA.

We agree with the proposers of both modifications that efficiency in the implementation of the code will be significantly improved due to the support provided by the Code Administrator, leading to greater output with more fluid findings (Objective F).

We agree that there will be a positive impact on effective competition (Objective D)

Of the two modifications, our preference would be for iGT062AA.

ESP believes that these are additional services that are not required under licence and as such, do not form part of Transportation Arrangements. As such, ESP believes the costs for these services are not currently recovered through transportation charges.

As equal beneficiaries to the change, and user of the proposed services,

Shippers should share in the costs associated with these additional services.

Self-Governance Statement

Do you agree with the Modification Panel's determination that this should be a self-governance modification?

N/A

Please state any new or additional issues that you believe should be considered

N/A

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Please see above for our view on how the objectives would be impacted.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

Both Pipeline Operators and Users should incur annual charges for the use of the services proposed by iGT062AA.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

We agree with the proposed timeframe of 3 months following Authority consent as this would permit the relevant service contracts between iGTs and the Code Administrator to be extended to include the additional secretariat services.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

We are satisfied that the legal text will deliver the intent of the modification

Further Comments

Is there anything further you wish to be taken into account?

No

Responses should be submitted by email to iGTUNC@gemserv.com