

Consultation Response**iGT100:
Reinstating Asset Query
Codes**

Responses invited by: 04 08 17

Respondent Details

Name: Andrew Margan

Organisation: Centrica Plc

Support Implementation ☐Qualified Support ☐Neutral ☐

Do Not Support X

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

Modification IGT039 removed IGT MAM query codes from the IGT UNC on 1st June 2017. These MAM codes are a hangover from when IGTs offered bundled transportation and metering services. In 2004 Ofgem ordered the unbundling of these services (SLC 4C).

Whilst most parties agree that supplier to MAM query codes are required, we don't support them being placed back into a shipper, transporter contract. This is a retrograde step and we have concerns this does not continue the development of effective competition.

IGTs have regulated transportation business that ring-fence their financial opportunities to ensure they provide a public service and have access to capital. The IGT MAM business is outside of this regulated activity.

It is important the development of effective metering competition is maintained. It is important unregulated MAM providers are able to compete with IGT MAMs in the provision of these metering services.

Our position is these MAM codes must sit outside of the IGT UNC governance arrangements. Therefore we don't support this change.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

Given that Ofgem directed the unbundling of Transportation and Metering services in 2004 (SLC 4C) and IGTs don't have a derogation, given the competition concerns, we believe Ofgem should decide if it is appropriate to place supplier IGT MAM query codes into the IGT UNC arrangements when neither suppliers or MAMs are party to the contract. Therefore self-governance arrangements are not appropriate.

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

None identified

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

This modification will have a negative impact to relevant objective (D) Securing of effective competition and (F) Promotion of efficiency in the implementation and administration of the Code.

Impacts and Costs

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

None identified

Implementation

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

N/A

Legal Text

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

Yes

Further Comments

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

Whilst we do not support this work, we can see that some parties may require these query codes. We believe IGTs can host this information on their query management webpages, so the information is not lost. This does not require a modification.

If governance arrangements are required for these MAM query codes, SPAA covers supplier MAM arrangements.

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