

iGT UNC / iGT INC Consultation Response

Date	15th November 2011
Reference	iGT040V DMR Consultation
Title	Amendment to AQ Values present within the CSEP NExA Table
Respondee	Sham Afonja RWE 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	Yes
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	Yes
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	Yes
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	

Relevant Objectives to be better facilitated:

Since the Aqs in the CSEP NExA table have not been reviewed for a number of years they do not currently accurately reflect current average consumption levels. We believe that by amending the Annex A of the CSEP NExA with the revised version produced by the IGT030 Review Group it would ensure that the AQ values contained within the NExA Table remain fit for purpose. This equally represents a reasonable estimate of the expected gas offtake in accordance with house type and geographical location for domestic properties connected to an iGT Network.

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By amending the CSEP NExA and updating the current table in Appendix CI - 1 of the iGTUNC with the AQ values proposed within Draft Modification Report 040v, we believe its implementation would better secure competition by limiting the instances of inequitable allocation of charges owing to the misallocation of energy volumes. The implementation of iGT040v can only be beneficial in that its introduction would ensure the AQ values that are related to CSEPs are more accurately recorded and as such domestic Transportation Charges for Shippers iGT portfolios are more appropriately apportioned and levied.

Likely impact on environment?

N/A

Implementation issues including impact on your systems

There are no associated ongoing system costs for RWE Npower should this Modification be implemented.

Additional Information and Comments

As part of the discussion at the IGT030 workgroup, the group agreed that the revised table is more reflective of the current AQ consumption across the market. Therefore, the increased accuracy of AQ values as a result of bringing them up to date will most likely change the allocation of energy and transportation costs between shippers.

We would like to see the new CSEP NExA table in place for 1st January 2012 in line with the scheduled IGT price change.

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