

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	05/10/2010
<b>Reference</b>	iGT031V Modification Proposal Consultation
<b>Title</b>	Amendment to AQ values present within the CSEP NExA Table to take account of revised Seasonal Normal Data (SND)
<b>Respondee</b>	(Please enter the name of the company you are replying on behalf of) Sham Afonja (RWE Npower)
<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	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	NO
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	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	NO

*Relevant Objectives to be better facilitated:*

### Likely impact on environment?

*How this proposal will, if implemented, impact on greenhouse gas emissions? N/A*

### Implementation issues including impact on your systems

### Additional Information and Comments

On behalf of RWE npower, I would like to thank you for the opportunity to respond to the

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above titled iGTUNC Modification Proposal. RWE npower supports the implementation of iGT031V. We believe that by amending the Annual Quantity (AQ) values present within the CSEP NExA to reflect the revised Seasonal Normal Data (SND) carried out by DESC (and so published by xoserve on August 4 2010) would ensure that the AQ values contained within the AQ Table remain fit for purpose which equally represent a reasonable estimate of the expected gas off take in accordance with house type and geographical location for domestic properties connected to an iGT Network.

By amending the CSEP NExA with the AQ values proposed within iGT031V 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 iGT031V 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. Ultimately this should ensure that Shipper costs are more accurately attributed thereby encouraging and facilitating the securing of effective competition between relevant Shippers.

Whilst fully in support of the proposal, RWE npower would like to see the iGTs fully engaged in the complete process of the development and future application of SNDs with DESC and xoserve. This is a more prudent approach that ultimately should ensure that Shipper costs are more accurately attributed thereby encouraging and facilitating the securing of effective competition between relevant Shippers.

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