

Consultation Response**iGT104: Permissions modification to allow the CDSP to release iGT supply point information under UNC MOD0520A**

Responses invited by: 17.01.2018

Respondent Details

Name: Rob Johnson

Organisation: ESP

Support Implementation



Please briefly summarise the key reason for your support:

ESP supports implementation of this Modification as it supports the Performance Assurance Framework (PAF) that is intended to promote and support effective competition between Shippers.

The accuracy of gas settlements is an important facilitator of effective competition. If costs are misallocated, this can lead to an unfair advantage for parties that have avoided those costs and reduce the advantage that should appropriately be gained by efficient operators. To the extent that market participants are not fully able to manage their exposure to settlement costs, it may even deter potential entrants. We consider the PAF to be vital component in the approach to managing gas settlement accuracy, which will in turn provide greater confidence to market participants.

The benefits of the PAF cannot be fully realised without complete dataset that includes IGT supply point information.

This permissions Modification allows the release of this data while ensuring IGTs remain compliant with legal obligations to safeguard data.

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?

ESP agrees that this modification is suitable for self-governance.

Relevant Objectives**How would implementation of this modification impact the relevant objectives?**

ESP agrees with the proposer that this modification delivers positive impacts to objective (d) as it improves accuracy in nominations and reduces reconciliation as well as the volume of Unidentified Gas.

As well as the above, objective (d) is positively impacted through promotion of accurate cost targeting and improvement of effective competition.

We also agree that objective (f) is positively impacted as it prevents duplication and additional costs through recreation of the reports implemented by Modification 0520A.

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

None.

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

As soon as practical in following a decision to implement.

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?**

No.

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