

Consultation Response**iGT105: Creating permissions for the CDSP to release data to Meter Asset Providers**

Responses invited by: 17th January 2018

Respondent Details

Name: Neil Brinkley

Organisation: BUUK

Support Implementation X

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

BUUK support the implementation of IGT105 for the following reasons:

- Cross-code alignment of the UNC/IGT UNC
- Reduction of misallocated charges leading to more efficient and economic operation of combined pipeline system

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?

We agree with the modification panel that IGT105 should be a self-governance modification.

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

We have no new or additional issues that we believe should be considered at this time.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Whilst we agree with the reasoning behind the facilitation of the relevant objectives identified by the proposer and working group, we believe the wrong objective has been chosen. There would be no positive impact on competition through the implementation of IGT105, unless it has been identified that suppliers and/or MAPs have been deliberately submitting incorrect charges. If this was the issue, then IGT105 is not the solution. We would argue that the relevant objective that is better facilitated by IGT105 is objective B, on the proviso that the combined pipeline system includes the metering equipment. If IGT105 leads to more accurate rental charges from the MAP then we would consider this to be more efficient and economic operation of the combined system.

Impacts and Costs

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

No development or ongoing costs are anticipated at this time.

Implementation

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

We have no preference on lead time for the implementation of IGT105.

Legal Text

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

Yes. We believe that the legal text delivers the intent of IGT105.

Further Comments

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

We have no further comments at this time.

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