

Consultation Response

IGT129: Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers

Responses invited by: 12 November 2019

Respondent Details

Name: Chris Barker

Organisation: BUUK Infrastructure

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We support the implementation of this change proposal because it will help close the loop in obligations alongside UNC change 0695 and SPAA change SCP 476. This will provide reinforcement to existing obligations and processes to ensure that end consumers receive their due compensation from IGTs. Because of this link with other changes it should be noted though that these should be monitored in case their implementation dates change, as alignment with particularly the SPAA change is important for this proposal to progress.

Self-Governance Statement

Do you agree with the determination with respect to whether or not this should be self-governance modification?

Yes, as stated within the workgroup while change is at the benefit of the end customer there is no changes to processes or final impacts, and therefore Self-Governance arrangements are suitable.

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

N/A.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree with the workgroup that Relevant Objectives C and F are better achieved by this change as it will improve clarity and transparency of the code and help discharge licensee obligations.

Impacts and Costs

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

There are no impacts or costs foreseen by this change.

Implementation

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

As the workgroup states, this changes implementation should be aligned to that of SCP 476.

Legal Text

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

As raised during workgroup sessions it is felt that a defined term would be more suitable to help explain and provide weight to the obligation proposed, however the current proposed text is deemed sufficient enough to meet the requirements.

Further Comments

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

N/A.

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