

Consultation Response

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

Responses invited by: 12.11.2019

Respondent Details

Name: Brandon Rodrigues

Organisation: ESP Utilities Group

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We support implementation of the modification as it places a clear obligation on Pipeline Users to pass voluntary Transporter compensation payments through to the relevant supplier, for onwards payment to consumers. This makes the transporter payment process to consumers more efficient.

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?

Yes, we believe this modification fits within the remit of self-governance criteria.

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

We have not identified any additional with the subject matter at this time.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We believe this modification impacts positively on relevant objectives C and F.

Objective C is facilitated as Shippers will now be mandated to transfer transporter payments to the relevant supplier or end consumer to a standard time-frame, thus making the process more descriptive and leaving little room for variation.

We also believe the modification achieves objective F and leads to better administration of the code.

Impacts and Costs

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

We do not expect to face any development and ongoing costs on implementation of this modification.

Implementation

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

We would expect implementation to be in line with the next scheduled code release.

Legal Text

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

Yes, we believe the legal text accurately communicates the intent of the modification and its subsequent requirements.

Further Comments

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

No further comments.

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