

Consultation Response

IGT133: Transition of IGT Theft reporting Into the IGT UNC

Responses invited by: 20th May 2020

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 the implementation of this modification as it seeks to transfer reporting obligations for IGTs previously governed under SPAA to the IGT UNC.

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 do not believe that this modification meets the criteria for Authority decision. Though we agree that there may be positive impacts to the operation of the pipeline system by providing this theft data to the authority, we do not consider this as crossing any materiality threshold, particularly considering this data is not generally used by industry. We therefore propose that this modification follow self-governance procedures.

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

We have not identified any new issues to be considered at this time.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree with the proposer's reasoning that Objective A would be positively impacted if this modification were to be implemented.

Impacts and Costs

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

We would not expect to incur any development or 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 agree that implementation of this modification may be aligned or follow the implementation of UNC 0704 as per the next scheduled code release.

Legal Text

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

We are satisfied that the legal text delivers the intent of this modification.

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