

Consultation Response**IGT144:** Ability to Reflect the Correct Customer Network Use and System Offtake Quantity (SOQ) During COVID-19

Responses invited by: 26th 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 this modification as we note the need for the usage of Class 1 and 2 sites to be accurately reflected during Covid-19, separate from the AQ data submitted by the relevant Shipper for the site.

However, as with IGT 141 and 143 which contain the same high level intent for reflecting usage of sites, we note that the modification itself does not propose any controls for monitoring beyond ensuring that revised SOQs are scaled back on September 30th. A framework is required to ensure SOQ reductions are due to Covid-19 circumstances and not due to nature of the site or for those experiencing unrelated reductions such as damages or maintenance.

There may also be a need to reconcile realised SOQs to revised figures to ensure accurate data is captured and recorded on consumption of sites.

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 that this modification should be subject to Authority decision.

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

No further issues have been identified at this time.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree that Objective A would be positively impacted by the implementation of this modification. However, we do not see how amending the SOQ for Class 1 and 2 sites in terms of improving accuracy would further competition between Shippers.

Impacts and Costs

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

We would face minor costs in monitoring and processing the SOQ revisions and ensuring these are accurately reverted on 1st October.

Implementation

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

We agree that implementation should follow the timeline provided by the Authority if approved.

Legal Text

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

Yes, we are satisfied that the legal text will deliver the intent of this modification as it stands.

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