

Consultation Response

IGT140: Changes to the IGT Panel Rules

Responses invited by: 16 Oct 2020

Respondent Details
Name: Kirsty Dudley
Organisation: E.ON

Support Implementation	<input checked="" type="checkbox"/>
Qualified Support	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Do Not Support	<input type="checkbox"/>

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

Currently there is reduced representation of Shippers at the IGT UNC Panel and this has been declining for some time, with openings on the panel being available for over a year without being filled.

The lack of Shippers is frequently now impacting the quoracy of the meeting and this model introduces flexibility to the approach and allows voting to be linked to the party type e.g. Shipper (Pipeline User) and IGT (Pipeline Operator) rather than to the person acting as a Voting Member.

This is a more agile approach and works with the maximum representation of 3 members or as little as a single member (for Shippers) and therefore addresses the issues we are seeing today. As the issue is not presenting itself for IGTs we don't see the need for the reduction of a single member for them but do believe that dropping it to 2 representatives is fair.

We recognise that this changes the 'traditional' approach taken by the code but we believe this is an approach which can deliver what is required from panel in the current circumstances. The voting model shouldn't be that rigid that it doesn't work with the needs of the market participants it is acting on behalf of.

It is recognised this solution doesn't address no Shipper representatives, this is because, in our view there should be Shipper views and participation at the panel. The reduced participation is perceived to be the best solution to the current challenges faced by panel.

Overall the solution addresses the current challenges Shippers have been facing, plus it introduces a proxy vote which all panel members can make use of, but with the view it should be the exception rather than the rule. The introduction of the guidance document ensures that new and existing panel members have a document to refer to. .

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 support sending this to the Authority for decision.

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

No new issues/comments.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

As the proposers we support the relevant objectives in the modification with the justifications provided.

Impacts and Costs

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

There are limited direct costs associated to this change, costs are mainly for the FTE representation at the panel. Until mid-2020 E.ON did have representation at a cost of the FTE associated to the task. There are no industry allowances for panel or committee costs in the IGT UNC so all these costs are absorbed by the organisation the panel members work for.

Implementation

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

As directed by the Authority, we do not believe this needs to be a scheduled release, this can be an adhoc release and can be as quickly as 5 WD from the decision being made.

Legal Text

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

No comments.

Further Comments

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

Insert text here

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