

Consultation Response

IGT140: Changes to the IGT Panel Rules

Responses invited by: 16 October 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 give Panel the ability to continue making decisions for the IGT UNC in cases where Panel representation is incomplete.

We would like to note our concerns on the disproportionate approach for IGTs and Shippers where Shippers can have a minimum of one Panel representative while IGTs must have a minimum of two Panel representatives though this concern does not impact our support.

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 with the Workgroup that this should be subject to Authority decision as iterated by the Authority representative who attended this modification's workgroup meetings.

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

We have not identified any new issues for consideration at this time.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree that Objective F would be better facilitated as this modification will improve the Panel's decision-making capabilities in the event of vacancies arising on the Panel.

We disagree that the modification would positively impact on Objective D as there will not be a direct impact on competition as this purely impacts Panel representative powers.

Impacts and Costs

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

We will not incur any costs to implement the solution of this modification.

Implementation

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

We agree the approach of implementing this modification five working days after Authority approval.

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 the modification.

Further Comments

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

We would like to note that the Section 3: Why Change? notes that a Pipeline Operator representative space is filled by a representative from ESP Group, but that spot has since been replaced by Lastmile.

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