

Consultation Response

IGT132: Introduction of IGT Code Credit Rules

Responses invited by: 27 January 2021

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 it aligns with existing code credit processes in other codes and implements a common methodology to facilitate these processes.

However, we believe there could be benefit to allow parties to bilaterally add to/subtract from or amend the current methodology to better fit the needs of parties that are seeking to obtain credit and parties that are required to provide it. This would be done on a case by case basis and would not detract from processes enacted by other parties. The methodology specified in this modification can serve as a backstop.

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

We believe there could be a benefit for the solution to encapsulate that parties may wish to agree bilateral measures to facilitate code credit. This is due to the fact that the methodology in this modification can be challenging for new entrants and smaller parties to understand and implement efficiently.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree with the proposer's view that Objective F is better facilitated by implementing this modification.

Impacts and Costs

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

There will be costs involved with implementing a process to utilise the new code credit methodology compared to existing procedures should the decision be made to do so.

Implementation

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

We support the implementation lead time of 6 months following 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?

No further comments.

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