

## Consultation Response

### IGT132: Introduction of IGT Code Credit Rules

Responses invited by: 27 Jan 2021

#### Respondent Details

Name: Cher Harris

Organisation: Indigo Pipelines Ltd

Support Implementation ☒ Y

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We support the introduction of standardised Code Credit arrangements within the IGT UNC. We believe this will make the arrangements transparent and consistent, and enable better governance, than the current bespoke arrangements contained within individual IGT's own Network Codes.

## 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?**

This modification is not suitable for self-governance as it could have a material impact on Shippers acceding to IGT UNC, therefore it should be sent to the Authority for decision

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

None

## Relevant Objectives

**How would implementation of this modification impact the relevant objectives?**

We agree with the proposer that this modification supports Objectives B & F; Code Credit arrangements will assist Transporters in the economic operation of their pipeline system (B), whilst standardising the arrangements and placing them in the IGT UNC will make the rules more transparent and improve the administration of them (F).

## Impacts and Costs

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

None identified – the application of Code Credit arrangements remains optional for Transporters

## Implementation

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

Nest scheduled release after Authority decision

## Legal Text

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

Yes

### **Further Comments**

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

None

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**