

Consultation Response

IGT132V: Introduction of IGT Code Credit Rules

Responses invited by: 13th April 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

Specific Panel questions

Q1: Panel would invite parties to consider the new legal text changes made following further Workgroup development in March 2021. These areas are specific to; addition of timescale for initial requests of credit cover, addition of bilateral agreements between Pipeline Operators and Pipeline Users, application of cover at a company or Group of Companies level and limitation of frequency that Pipeline Operators can request cover from a Pipeline User in an Annual period

We are happy with the proposed legal text changes and believe they provide additional clarity

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?

Next 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