

Consultation Response

IGT138V: Performance Assurance Techniques and Controls

Responses invited by: 23rd May 2022

Respondent Details
 Name: Michelle Brown
 Organisation: Energy Asset Pipelines (EAP)

Support Implementation	X
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

EAP are in support of modification IGT138V as this should provide an effective framework for the governance of industry performance that gives industry participants mutual assurance in accuracy of settlement volume allocation and should result in an increase in competition and the allow new shippers to enter the market.

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

N/A

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We consider that this change would have a positive effect on relevant objectives (D) and (F).

(D) The modification should result in the reduction of settlement costs by reducing volume uncertainty at nomination and allocation, thereby reducing the likelihood of shippers passing premiums into customer contracts. It should also reduce costs for shippers in meeting UNC obligations and ensure that one Party's commercial decisions do not impact any other party. This should improve competition and support new shippers entering the market.

(F) The modification also promotes the effectiveness of PAF and promotes a more efficient application and administration of the Code by implementing a single set of Performance Assurance Arrangements across both the IGT UNC and the UNC.

Impacts and Costs

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

For modification iGT0138V we confirm that we will not incur additional development or ongoing costs.

Implementation

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

As this modification requires an authority direction is received and subject DSC Change Management Procedures for any system changes. EAP agree that this should not be implemented if UNC0674 be rejected. This should be implemented on the same date as UNC0674.

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?

NO

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