

Consultation Response

IGT167: Alignment of the IGT UNC with UNC NGT Demand Side Response Arrangements

Responses invited by: 11 AUG 2023

Respondent Details
Name: Cher Harris
Organisation: Indigo Pipelines Limited

Support Implementation	Y
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

We support this modification being implemented so that customers connected to IGT networks are able to engage with Demand Side Response arrangements and receive the same advantages as customers on GDN networks

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 proposer that this modification should be subject to Authority decision and mirror the approach taken for the UNC equivalent modifications

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

None identified

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree with the proposer that Relevant Objectives A & B are positively impacted as opening DSR arrangements to IGT customers helps to reduce the risk of a Gas Deficit Emergency occurring by widening the pool of customers who can voluntarily shed load to prevent a gas shortage from escalating into a national emergency

Impacts and Costs

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

None identified

Implementation

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

Implement as soon as possible after Authority consent with the aim of aligning as close as possible with the implementation of the UNC equivalent Mods and in time for Winter 23/24.

Legal Text

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

Accept the proposed legal text

Further Comments

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

none

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