

Consultation Response

IGT169: Aligning the Capacity requirements for NExA Supply Points in the UNC with Capacity requirements for LDZ CSEP Ancillary Agreement (LCAA) Supply Points under the IGT UNC (i.e., bringing Code in line with UNC0701 and UNC0853).

Responses invited by: 20th October 2023

Respondent Details
Name: Cher Harris
Organisation: Indigo Pipelines Limited

Support Implementation	<input checked="" type="checkbox"/>
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

This modification clarifies a difference in terminology between UNC and IUNC and ensures IGT supply points are treated the same as GDN supply points in regards to capacity constraint arrangements.

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 for Authority Decision because of the potential impacts to end consumers and on security of supply.

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 Objectives A, B & C are positively impacted by this modification, by enabling capacity to be effectively managed across both the IGT network and the whole system.

Objective D may be positively impacted by ensuring Shippers taking on IGT supply points that are subject to an LDZCAA are not adversely affected by differing operational arrangements. However the very limited number of IGT sites subject to LDZCAA makes this negligible and unlikely to impact competition.

Objective F is positively impacted by bringing consistency across the 2 Codes, making it easier for parties to understand the arrangements and their obligations.

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?

As UNC capacity constraint arrangement Mods 0701 & 0853 will be effective from 04/11/2023, this related modification should be implemented as soon as possible after Authority Decision.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification and are satisfied with the amendments made following discussions during Workgroup?

Support the amended legal text

Further Comments

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

None identified

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