

iGT UNC / iGT INC Consultation Response

Date	8 October 2009
Reference	iGT025 Consultation
Title	Window for Submitting Meter Readings
Respondee	Sham Afonja, RWE npower
Position on the Modification	Support Modification

Facilitation of the relevant objectives

We believe that the implementation of this modification proposal will facilitate “effective competition between relevant shippers” as it would ensure more reads are validated by Shippers and then provided to the Pipeline Operators for energy cost allocations. This we believe should improve the cost reflectivity of transportation charges.

Additional Information and Comments

RWE npower supports the implementation of this modification proposal. We believe that by extending the window for submission of Valid Meter Reads, from the current 15 business days to 25 business days should help to facilitate a more accurate allocation of energy and transportation charges between relevant Users.

By extending the window for Meter Reads submission, it is very likely that the industry could see a significant decrease in the number of potential Must Reads generated by the Pipeline Operators. Given that the extra days will allow for more time for validation of reads by shippers, it should be expected that this could prompt acceptance of more reads by the Pipeline Operators that would otherwise be rejected for failing the current read submission deadline.

We also believe that the implementation of iGT025 should increase the proportion of Reads accepted by the Pipeline Operators. This however, could lead to the Pipeline Operators holding more accurate AQ data which in turn should reduce the volume of sites with inaccurate AQ values that shippers will need to challenge during AQ Review. This can only be beneficial to the system and energy settlement as a whole as it will ensure that Shippers costs are more accurately attributed.

Finally, we agree with Scottish Power (the proposer) on the suggested timescale. This modification proposal will have minimal impact as it only seeks to extend the window of acceptance of meter reading from 15 to 25 business days.

Completed forms should be returned to the iGT UNC Representative, Gemserv Ltd at iGT-UNC@gemserv.com or faxed to 020 7090 1001