

iGT UNC / iGT INC Consultation Response

Date	10 th September 2012
Reference	iGT 038
Title	Periodic Annual Quantity Calculations
Respondee	Dan Simons - EDF Energy
Position on the Modification	Do not support Modification

Facilitation of the relevant objectives

How this proposal will, if implemented, better facilitate the "code relevant objectives", as defined in Standard Condition 9 of the Gas Transporters Licence. For those answered Yes to, please provide a detailed explanation below the table.

<i>Relevant Objective</i>	<i>Yes/No</i>
a. the efficient and economic operation of the pipe-line system to which this licence relates	No
b. so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters	No
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	No
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	No
e. so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers	No
f. so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition	No
g. so far as is consistent with sub-paragraphs (a) to (f), the compliance with the Regulation* and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators	No

* Regulation 2009/715/EC of the European Parliament and of the Council of 13 July 2009

Relevant Objectives to be better facilitated:

Likely impact on environment?

How this proposal will, if implemented, impact on greenhouse gas emissions?

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Implementation issues including impact on your systems

System costs will include;

- Cost of changes to load monthly AQs into our customer billing system and invoicing system
- Changes to our file transfer system
- Removal of the 63 day tolerance of sending meter reads to the IGT

There will also be process changes for IT, Customer Services and Settlement teams.

EDF Energy understands that there is a significant amount of development to all the IGTs separate systems in order to implement this modification. We would not be supportive of financing any of the additional cost ahead of Project Nexus.

Additional Information and Comments

Whilst EDF Energy supports the concept of an industry wide rolling AQ we do not support changes that increase the differences between the IGT regime and the DN regime. The change proposed has been developed ahead of the rolling AQ regime proposed under Project Nexus and is therefore likely to differ from the regime operated by Xoserve. We do not feel that the industry can make an informed decision in 2012 to implement a change in 2016.

Our preference will be for IGT sites to be migrated onto a single platform within the first phase of Project Nexus and for subsequent changes to occur to the whole of the market without exception.

By maintaining two AQ regimes whilst we have a Reconciliation By Difference allocation process will compound the lack of clarity of energy allocation between DN and CSEP markets. We believe that a more appropriate time to raise this change is when there is clarity on Project Nexus and the single service provision.

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