

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	
<b>Reference</b>	<b>iGT048 Modification Proposal Consultation</b>
<b>Title</b>	<b>iGT048 - Estimated Opening Meter Reads Code Amendment</b>
<b>Respondee</b>	<b>Andrew Margan, British Gas</b>
<b>Position on the Modification</b>	<b>Support Modification</b>

### 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	Yes
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	Yes
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:*

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### Implementation issues including impact on your systems

No system changes are required as part of this proposal.

### Additional Information and Comments

British Gas Supports this modification.

We believe that 10 days is an adequate time period for allowing reads to be exchanged between parties.

Guaranteed longer meter read window facilities greater volumes of actual reads through the Change of Supply process. The extended window ensures that any correct reads that fail validation are more likely to be amended in time. We believe this is good for the industry and good for customers.

Furthermore this proposal promotes efficient administration of the code by aligning the UNC 0427 modification proposal to the IGT UNC 048 code proposal.

This modification proposal brings into code industry practice of accepting reads up to 10 days. This mitigates the risk to industry parties of future changes that may restrict the acceptance of files to 7, 8 or 9 days.

Any changes to the current window will require system changes and increase costs to Shippers as a consequence, with little to no gain.

If you have any questions please do not hesitate to contact me on 07789 577327.

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