

iGT UNC / iGT INC Consultation Response

Date	30/08/2010
Reference	IPL038 and QPL038 Modification Proposal Consultation
Title	Remove TAS Specific Change Processes from INC
Respondee	ScottishPower Energy Management Limited (SPEML)
Position on the Modification	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 too, 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	Y
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	Y
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	Y
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	Y
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	N
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	Y

Relevant Objectives to be better facilitated:

The implementation of the Proposals will ensure there is one Modification Process followed by all Pipeline Operators and Users. This introduces clarity and surety for all parties that any amendments to the Uniform and Individual Network Codes will follow the same and common process. This removes any duplication of effort for the Pipeline Operator and for Pipeline Users and is therefore a more efficient process for the Pipeline Operator in discharging the objectives of economic operation of the pipe-line system. This will ultimately help secure effective competition between relevant shippers and suppliers since it will ensure all changes to the IPL and QPL short code is centrally managed and full visibility is achieved over responses received and the decisions taken regarding implementation.

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Likely impact on environment?

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

No impact identified.

Implementation issues including impact on your systems

No implementation issues identified. We believe the 2 month implementation timescale being suggested is sensible.

Additional Information and Comments

We fully support the implementation of the Proposals since we agree with the Proposer that the current TAS change processes are a throwback to the disparate change arrangements that were operated by the Pipeline Operators prior to the introduction of the iGT Uniform Network Code (iUNC). The iUNC contains a standardised change process that is centrally administered by the Pipeline Operator's Representative. This ensures all changes are managed in a consistent manner and are widely published to all impacted industry participants. By bringing the change management of IPL and QPL's TAS system under this banner it will ensure a consistent approach across all short code and iUNC changes. This is a more efficient and economic way to manage such changes and ensures all impacted parties are fully engaged within the process by providing full visibility of any changes to IPL/QPL's TAS system, which at present relies on the maintenance of an e-mail contact list.

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