

Consultation Response**iGT075: Identification of Supply Meter Point Pressure Tier**

Responses invited by: 29 Sept 2016

Respondent Details

Name: Laura Cahill

Organisation: SSE Supply

Qualified Support Yes**Please briefly summarise the key reason(s) for your support / opposition**

SSE supports implementation of this Modification. We do, however, acknowledge that there may be resistance to implementation based upon the fact that the approach set out in the equivalent UNC Modification, namely *UNC Mod 0526*, was subsequently rejected and was instead implemented as a solution without the obligation being formally introduced into the UNC.

We support the rationale for change, namely that it will reduce the need to have recourse to the GT1 procedures, which is the current method by which Shippers/ Suppliers/ MAMs who require knowledge of pressure tiers applicable to MPRNs obtain this information. We agree that, if implemented, this Modification would give greater knowledge of pressure tiers applicable to specific MPRNs to shippers/ suppliers/ MAMs, thereby ensuring they send the appropriate skilled staff with the correct metering equipment. We agree that there is a consequential benefit of reducing the likelihood of sending inappropriately qualified meter workers - reducing abortive work, frustrated customers and in the worst case, inappropriate work, which could lead to a safety incident with all the consequential impact on iGT, Shipper, Supplier, MAM, customers and members of the public.

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 that this should be a self governance Modification

Please state any new or additional issues that you believe should be considered

Although we agree with the principle of sharing metering pressure information around the industry, we believe this modification would serve as an interim and manual measure only.

It would be beneficial if this information was transferred between market participants using industry flows (namely RGMA). We can envisage the information being flowed to Shippers on change of supplier and onwards to the supplier and chosen MAM and again when a metering visit is requested. This will ensure the MAM is fully aware of the metering pressure when arranging suitably trained engineers and equipment to be available in a systemised way.

We also acknowledge that, if this Modification is implemented, there would be costs incurred by iGTs for the gathering, hosting and maintenance of this information, but are in agreement with the statement within section 5 'Impacts and Costs' of the draft Modification Report, which states '...whilst there will be initial costs to build and publish the data that will be incurred by the Pipeline Operators, the anticipated reduction in manual work by Pipeline Operators should result in a net benefit to them.'

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree that the Relevant Objectives which would be better facilitated are Objectives (a), (c) and (d). We agree that, in particular, it will have a positive impact on (d) due to the information being transferred between market participants.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

We have not identified any specific ongoing costs to ourselves.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

As soon as possible.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

We are broadly satisfied that the legal text will deliver the intent of the modification.

With respect to the 'Pressure Tier' line of Appendix K-4, it may be beneficial to split this section as below, in order to highlight more clearly that use of GT1 is the last resort.

'As per GT1 definitions, e.g. (LP, MP35, MP65, MP105, MP180, MP270, IP) with the following additional conditions:

- Use MP, where the pressure tier is known to be medium pressure but cannot be more specifically identified **AND/ OR**
- Use GT1, where within a postcode the pressure tiers are mixed or unknown.'

Further Comments

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

No thank you.

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