

iGT UNC / iGT INC Consultation Response

Date	2 nd March 2012
Reference	iGT041 DMR Consultation
Title	EU Third Package 3 week switching
Respondee	Danielle Fynney - E.ON Energy
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 to, please provide a detailed explanation below the table.

Relevant Objective	Yes/No
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	Yes
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	Yes

* 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?

Implementation issues including impact on your systems

System change will be necessary.

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Additional Information and Comments

E.ON supports this modification as we believe it provides a fixed consistent solution that achieves compliance in all worst case scenarios, in accordance with the Electricity and Gas (Internal Markets) Regulations 2011.

In the worst case scenario where there are four bank holidays and three weekends, this proposal will still allow time for an objection to be raised and for the registration process to complete in 21 days.

We believe that this proposal meets relevant objective (d) as it continues to give Suppliers the opportunity to object, regardless of bank holidays or weekends.

The proposal gives certainty and clear timescales with the Objection and Confirmation window being fixed. It also negates the need to amend system information each year, with bank holiday/non working day dates.

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