

iGT UNC / iGT INC Consultation Response

Date	02/03/2012
Reference	iGT041 Modification Proposal Consultation
Title	EU Third Package 3 week switching
Respondee	British Gas
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:

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Likely impact on environment?

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

Implementation issues including impact on your systems

Additional Information and Comments

British Gas supports the implementation of Modification Proposal 042, but does not support the implementation of Modification Proposal 041.

The proposals and the solutions contained within 041 and 042 are identical to those detailed within UNC Modification Proposals 0396 and 0403 respectively.

To ensure a consistent approach across the industry, it is essential that the decision on proposals 041 and 042 are aligned with the decision ultimately by the Authority on UNC Mod0396 and Mod0403.

Therefore to ensure consistency of response across the two codes I have attached our responses to UNC Mod0396 and Mod0403, which details our views on the two proposals and solutions and provides rationale for these views. For clarity Mod0396 reads across to IGT UNC041 and Mod0403 reads across to IGT UNC042.

In terms of how the proposals better facilitate the relevant objectives.

We believe that whilst IGT UNC042 does better facilitate the relevant objectives and IGT UNC041 does not.

IGT UNC041

We do not believe that, as currently drafted and developed, that the proposal meets the Relevant Objectives of code as detailed within the proposal.

The proposal acknowledges that not all supply points will be able to be achieved within the requirements set out within the Supply Licence.

The potential for reduced volumes of actual opening meter readings, resulting in increased volumes of estimates, increased shipper agreed reads and customer complaints has not been fully explored and will have a detrimental impact upon effective competition rather than securing it.

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