

iGT UNC / iGT INC Consultation Response

Date	29/2/12
Reference	iGT041 Consultation
Title	EU third package - 3 week switching
Respondee	David Speake ES Pipelines
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.

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	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	Yes

* 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?

None.

Implementation issues including impact on your systems

A number of hard-coded parameters will need to be changed. Development effort will not be significant but nevertheless we expect the standard 6 month implementation to be applied should the modification be approved.

Additional Information and Comments

Of the two related proposals, 041 is not ESP's preferred option. There is no significant difference to systems development requirements between the two proposals. However we note that this proposal has an impact on the switching timetable throughout the year rather than just at times of Bank Holidays.

It is also to be noted that this proposal does not exist in isolation of the changes being made within Xoserve, the large transporters agent. ESP fully expects that decisions made for the associated UNC modification will have a bearing on the changes made to iGT UNC.

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