

iGT UNC / iGT INC Consultation Response

Date	29th February, 2012
Reference	iGT041 DMR Consultation
Title	EU Third Package, 3 week switching
Respondee	Steph Shepherd: RWE npower Stephanie.shepherd@npower.com
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	Yes
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?

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None

Implementation issues including impact on your systems:

In order to meet the requirements of the EU directive, RWE npower will be required to make system changes.

However, having looked at both iGT041 and iGT042, and how we would implement them, we are in support of mod 041. We believe that this presents an overall more robust solution, and presents significantly less risk to the achieving the timescales for customer switching and billing.

Additional Information and Comments:

In addition to the above comments, there is a risk that the Suppliers effectiveness in managing Erroneous Transfers will be affected by the overall change in the switching timescales.

As there is no alternative but to reduce the objection window, it is likely that the opportunity to raise a co-operative objection will be reduced and will therefore, impact the number of ET's.

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