

iGT UNC / iGT INC Consultation Response

Date	2 March 2012
Reference	iGT041DG DMR Consultation
Title	EU 3rd Package - 3 Week Switching
Respondee	Anne Jackson - SSE Supply
Position on the Modification	Do not support Modification For Reference: Support Mod iGT042

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

We believe the modification meets the relevant objective (g) above but not relevant objective (d)

Likely impact on environment?

None

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Implementation issues including impact on your systems

This modification has greater costs for parties than that of modification iGT042. Shortening both the objection window and the confirmation maximises the systems and processes impacted both for ourselves and other parties.

We believe that the impact of operating reduced timescales for both windows throughout the year will have a detrimental impact on customer service. This will also happen with modification iGT042 for a low number of occurrences around bank holidays, but infrequent instances can be planned for and managed to reduce the impact on the customer experience.

Looking forward to the centralising of gas registration systems in the Nexus delivery and the expectation of all registration systems going into the new central body in the early stages of the Smart rollout leads us to see this as an interim solution before registration systems can be addressed properly in conjunction with the electricity industry. For that reason we would want to see a less complex system solution delivered at a lower cost.

Registration systems are central to the gas switching process and we would wish to reduce the risk of problems becoming apparent to customers to ensure that the reputation of the Industry and ourselves is not impacted by this modification. We believe this can be achieved through reduced system changes and complexity which this modification does not offer.

It is acknowledged that the nomination process is not included but recognised that nominations can be obtained during the cooling off period, where applicable, or during the pricing and negotiation period prior to contract signature.

We would wish to see implementation twelve months from the date of implementation, which we believe fits with the DN's assessment of when their changes can be delivered. We would like the iGT and the UNC modifications, required to achieve the same outcome, to be implemented at the same time.

Additional Information and Comments

This modification does not ensure licence compliance for suppliers in 100% of cases, and provides reduced windows for objections and obtaining meter readings constantly rather than when required for bank holidays.

This will result in more transfer reads being estimated due to the customer not having their transfer date confirmed well in advance of the actual date on more occasions and greater numbers of erroneous transfers, due to the inability to inform the customer they will be leaving their supplier before the objection window has closed. This is particularly relevant for iGT transfers as the iGT



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response times to files are not consistent and are sometimes the full 2days allowable within the iGT UNC.

This modification will also take longer to implement due to the complexity of shortening both the objection window and the confirmation window and will cost both ourselves and other parties more money in doing so.

We are happy with the drafted legal text.

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