

iGT UNC / iGT INC Consultation Response

Date	2 nd March 2012
Reference	iGT042 DMR Consultation
Title	EU Third Package 21 day switching with flexible objection window
Respondee	Danielle Fynney - E.ON Energy
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	No

* 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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Implementation issues including impact on your systems

System change will be necessary.

Additional Information and Comments

E.ON does not believe that iGT042 meets the requirement of three week switching.

Having looked at the timelines provided by SSE, the worst case scenario (the maximum bank-holiday situation combined with an iGT requiring the full two days) may result in no time for an Objection to be placed.

This proposal will also affect Internal applications, as our systems would need to recognise how many days are in the Objection window and Staff scheduling. Switches initiated later could have a smaller Objection window than earlier ones, changing the workflow priority.

It is for these reasons that we do not believe this proposal meets objectives (c) and (g).

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