

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	2 March 2012
<b>Reference</b>	iGT042 DMR Consultation
<b>Title</b>	iGT042 EU 3rd Package - 21 day switching with fixed objection period
<b>Respondee</b>	Anne Jackson - SSE Supply
<b>Position on the Modification</b>	<b>Support Modification</b> For Reference: Not in Support Mod iGT041

### 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 (c)

### Likely impact on environment?

None

### Implementation issues including impact on your systems

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This modification enables SSE to alter fewer systems and processes than would be required to implement modification iGT041, therefore leaving all other processes in place. This reduces both risk and costs, particularly as systems are heavily interlinked.

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 between nine and twelve months from the date of implementation, which we believe fits with 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 will enable suppliers to meet their licence obligations to switch customers within 21 calendar days 100% of the time, with a quicker implementation time and at less cost for all parties than Modification iGT041, which seeks to achieve the same outcome of compliance.

Additionally the modification helps ensure that the customer experience is unaltered by the reduced timescales. Retaining the seven day window prior to supply transfer will enable the current levels of opening meter readings obtained to be maintained, therefore reducing the number of estimated readings used at change of supplier and ensures that erroneous transfers are minimised by only reducing the objection window where bank holidays and non working days occur. This is particularly relevant, as the response times to files from shippers by iGT's are not consistent and iGT's sometimes take up to the maximum 2 days allowed under the iGT Network Code, further diminishing the ability for suppliers in maintaining customer experience standards.

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](mailto:iGT-UNC@gemserv.com) or faxed to 020 7090 1001