

## Initial Representation - UNC 0842

### Gas Entry onto the Total system via an Independent Gas Transporter

<b>Representative:</b>	Tom Stuart
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	20.04.23
<b>Support or oppose implementation?</b>	Initial Representation
<b>Relevant Objective(s):</b>	Not applicable at this stage
<b>Relevant Charging Methodology Objective(s):</b>	Not applicable at this stage

#### Initial Representation.

We realise that there may be good reasons why the producer wishes to use an IGT rather than connect directly to the DNO network; however, if that approach is taken then the IGT needs to accept and fulfil its obligations.

As the entry point will be connected to the IGT network then logically Ofgem will direct, using powers in Gas Act section 12, the IGT not the DN to measure the CV of the gas entering the network. Costs incurred in doing this will be incurred by the IGT and should be charged to the entrant appropriately. No obligations or costs should be incurred by the DNO. If the IGT would prefer the DN, or another party, to manage the entry point then this can be arranged through a bilateral contract.

We believe that tri-partite agreements can be unnecessarily complicated and can make obligations for parties unclear. Our view is that the IGT should have an entry agreement with the producer and the DNO and the IGT should also have an entry agreement with obligations suitably backed off in each. We believe this would be a better approach and makes clear that all parties are clearly responsible for their own obligations.