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iGT UNC / iGT INC Consultation Response

Date	27 March 2009
Reference	IGT024VV/ IGT024VAV Consultation
Title	Inspection Notification and Cyclical Read File Formats and Response Files – Clarification of File Naming Convention - Sequential
Respondee	ScottishPower Energy Management Ltd Lorraine McGregor
Position on the Modification	IGT024VV - Support Modification IGT024VAV – Do not support Modification

Facilitation of the relevant objectives

As the proposer of iGT024VV ScottishPower believe that implementation of this Modification will further the following code relevant objectives:

Standard Condition 9 (d): so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers

Standard Condition 9 (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.

As stated in the Modification the obligation to provide cyclical reads and meter inspection notifications lies with the Pipeline User, hence the validation performed by the Pipeline Operator (on file numbering) should simply be that the file received has a higher number than the previous file.

With regards to the promotion of efficiency we believe the use of sequential file numbering is superior to consecutive since it affords flexibility and prevents issues in relation to processing files. Specifically, if sequential was used it would prevent processing issues relating to subsequent files should there happen to be a missed file from a Pipeline User. If a file happened to fail any subsequent files would continue to be accepted, with the Pipeline User being responsible for investigating and resolving any issue with the missing file. However, if consecutive was used and an error was made with a file number this would cause all subsequent files to be rejected until the situation was resolved. The effect being failure of more up-to-date meter readings and meter inspection notifications being accepted.

Sequential does not prevent any Pipeline User from using consecutive numbering should this be their preference. Making the standard sequential it allows parties

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flexibility in how they manage their file numbering. Whereas the introduction of consecutive numbering would remove any flexibility. This would cause issues for Pipeline Users who integrate their iGT meter readings with the large transporters, since the large transporters accept sequential numbering.

Additional Information and Comments

Although ScottishPower can build to either sequential or consecutive, we believe sequential is the most pragmatic solution since it affords increased flexibility and also prevents file failure/rejection issues should there be an issue with one file number.

It is essential that a decision be made on the file numbering convention in order to support the implementation of iGT013VV and iGT015VV, which have an implementation date of November 2009.

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