

iGT UNC Draft Modification Report Response

Date	1 st April 2009
Reference	iGT0024VV & iGT0024VAV
Title	Inspection Notification & Cyclical Read File Format and response file - Clarification of File Naming Convention - Sequential or Consecutive
Respondee	RWE npower Heidi Martin
Position on the Modification	Support Modification
<p>Facilitation of the relevant objectives</p> <p>Implementing this proposal will facilitate the following relevant objectives as stated by the Proposer:</p> <p><i>“the securing of effective competition between relevant shippers and between relevant suppliers</i></p> <p><i>“the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code”</i></p> <p>RWE npower also believe that this Modification proposal could better facilitate the following objective too:</p> <p><i>“the co-ordinated, efficient and economic operation of the pipeline system”</i></p> <p>RWE npower believe that consecutive numbering could act as a barrier to submitting meter reads/meter inspections in a timely manner. If a file should go missing and subsequent files are rejected, this could impact the reconciliation values that are forwarded from the iGTs to Large Transporters. We believe that sequential numbering will allow more reads to feed through the process thus allowing more accurate reconciliations to take place which will benefit the economic operation of the networks.</p> <p>It is the Users responsibility to ensure that files are correctly formatted etc, having additional validation rules adds an undue complexity to the process that could hinder the success of the submitting files.</p>	



Additional Information and Comments

RWE npower supports the implementation of iGT0024VV - Sequential over iGT0024VAV - Consecutive.

RWE npower agree with the Proposer that the Sequential Modification proposal provides Users flexibility in which file naming convention to adopt. Arguably this could make it more difficult for Operators to validate files if Users use varying file naming conventions.

RWE npower believe that most Users are hoping that introducing standardised meter read and meter read file formats will allow them to integrate the management of iGT meter reads with that of the Large Transporters. In discussions with our IS department it has become apparent that the Large Transporters accept sequential numbering. If we introduce a variant i.e consecutive numbering for iGT's, Users will have to develop a bespoke numbering system which will inevitably bring about additional costs.

RWE npower appreciate the argument from some Parties that consecutive numbering will allow Operators to quickly identify "missing" files. Our concern is that any files that are subsequently sent will be rejected. This could cause Users issues when having to deal with the backlog of files to resubmit. We feel that it is a User's responsibility to ensure that files are sent in the correct format and contain the appropriate records. We think that adding an additional level of validation may cause some Operators to incur additional costs or resources to implement consecutive numbering validation.

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

