

## iGT UNC / iGT INC Consultation Response

<b>Date - 06/01/2010</b>	
<b>Reference</b>	<b>iGT026V DMR</b> (Delete as required)
<b>Title</b>	<b>Password Protection Protocols</b>
<b>Respondent</b>	<b>Envoy on behalf of Independent Pipelines Limited and Quadrant Pipelines</b>
<b>Position on the Modification</b>	<b>Do not support Modification</b>
<b>Facilitation of the relevant objectives</b>	
How this proposal will, if implemented, better facilitate the “code relevant objectives”, as defined in Condition 9 of the Gas Transporters Licence.	
<p>a. the efficient and economic operation of the pipe-line system to which this licence relates;</p> <p>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;</p> <p>c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence;</p> <p>d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers;</p> <p>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;</p> <p>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;</p>	
<b>Additional Information and Comments</b>	
<p>Envoy is fully supportive of the intent of the proposal and agrees that further action is necessary to ensure that portfolio extracts and invoice backing data are secure. However, though we appreciate that the current mod provides for parties to agree other solutions we do not believe that the current proposed baseline is the most efficient way for an iGT to operate. Recent analysis has shown that Envoy dealt with a large number of shipping licences on its last monthly run and manually zipping and password protecting C.90 separate files would create a large administrative burden and increase the risk of human error. Envoy currently automates its shipper portfolio extracts and is currently looking to automate the</p>	

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invoice backing data – changing to a manual process will be a retrograde operational step. This also leaves us with the problem that should a party refuse to agree to use an alternate iGT solution, the iGT will have no choice but to use the baseline solution. As we do not believe the baseline to be the most efficient solution or secure solution, we do not believe that the proposal in it's current form satisfies the relevant objective but most specifically relevant objective a.

To reiterate, we agree that further measures need to be taken to secure both the portfolio extracts and invoice backing data but do not support the current proposed solution. We would be supportive of a baseline solution which offers a more efficient security method which based on our canvassing of shippers appears to be FTP. This would provide iGTs with the opportunity to automate the security aspect of the files and should shippers wish for a different solution, this can be agreed bi-laterally. We are disappointed that on contacting the proposing organisation to enquire as to whether they would raise a variation (along the same principles of recent mods iGT UNC 024VV and iGT UNC 024VAV) with an FTP baseline they refused as this may hold up the process should this solution not be accepted.

**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**