iGT | UNC

Consultation Response

iGT094F: Amendments to file format types for iGT078 and iGT079 flows

Responses invited by: 07 Feb 2017

Respondent Details

Name: Kirsty Dudley

Organisation: E.ON UK

Support Implementation	☐
Qualified Support	☑
Neutral	☐
Do Not Support	☐

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Please briefly summarise the key reason(s) for your support / opposition

We support the principle of the implementation for the new file naming to ensure Pipeline Users and Pipeline Operators are able to share the files between them. Legal text drafting states all PS1 references have been replaced yet on the first page of the file format document for the Project Summary Report it still refers to PS1, the same with the Project Summary Notification and reference to PS2. The ancillary documents again refer to PS1/PS2 throughout and it is unclear if this is because the modification only aims to amend the file name to PSA/PSB or ALL references throughout all documents.

The transaction type within PSA standard header has been updated to PSA but the transaction type in the PSB standard header has remained as PS2, for consistency we are unsure which is correctly formatted. Furthermore the PSA RT_PS1_Project_Summary has remained as PS1 rather than being updated to PSA – as all references were meant to be updated this is not consisted to the legal text specified solution.

There is no reference in DMR to some PS1 values remaining so should they all have been replaced with the PSA/PSB reference? These values could remain but it requires clear consistent direction in the ancillary and file documentation to ensure robust file creation.

We are concerned the fast-track modification only addresses the file naming but doesn't address the Project Summary Report and Project Summary Notification file documents explicitly referencing 'Domestic Sites Only' still on page 1. Although the ancillary documents have been split into Domestic and Commercial the file formats have been designed for both sectors and it could be misleading for Pipeline Users without correction.

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Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

We agree the amendments being made are not material and support the modification proceeding as self-governance.

Please state any new or additional issues that you believe should be considered

As referenced in the summary this change corrects the file names but doesn't remove the domestic sites only reference on the 1st page of both file formats.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Objective F supports the relevant objective as it promotes efficient and effective delivery of the PSR requirements.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

Low costs for testing and implementation to ensure the files can be sent/received.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

We support implementation asap to ensure robust and efficient delivery of the files

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

As covered in the summary there are still references to PS1 and PS2 within the file format documentation, it is unclear from the modification if this is due to some references not being updated or due to the file formatting can remain as PS1 and PS2 without compromising the file delivery. The modification suggests all PS1/PS2 are to be replaced but the file formatting doesn't demonstrate this.

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Further Comments

Is there anything further you wish to be taken into account?

No further comments.

Responses should be submitted by email to iGTUNC@gemserv.com

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