

## Stage 04: Final Modification Report

# iGT073S:

## Single Service Provision: Consequential Changes to the 'Pipeline Operator Standards of Service Query Management' Ancillary Document

At what stage is this document in the process?

- 01 Modification Proposal
- 02 Workgroup Report
- 03 Draft Modification Report
- 04 Final Modification Report



*The solution is to change the 'Pipeline Operator Standards of Service Query Management' Ancillary Document, having distinct sections for 'queries' Shippers are able to submit to iGTs and 'contacts' Shippers are able to submit to the Transporter Agency under Single Service Provision.*



Panel determined to implement/not implement the Modification (SG)



High Impact:



Medium Impact:  
Pipeline Users, Pipeline Operators



Low Impact:

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## About this document:

This document is a Final Modification Report, presented to the Panel on 20<sup>th</sup> May 2015.

The Panel will consider the views presented and decide whether or not this self-governance change should be made.



Any questions?

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iGT073S

Final Modification Report

21<sup>st</sup> April 2015

Version 1.0

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## 1. Plain English Summary

### Is this a Self-Governance Modification?

The Modification Panel has agreed that this Modification should be subject to Self-Governance; there are no material impacts to consumers or competition, and the Modification is properly for administration purposes in connection with the wider implementation of iGT039.

### If so, will this be progressed as a Fast Track Modification?

The Modification Panel has agreed that this Modification does not meet the criteria for Fast Track Self-Governance.

### Rationale for Change

As part of development of the common services, systems and processes, the Transporter Agency has now confirmed the operational 'queries' which will be handled on behalf of the iGTs by the Transporter Agency.

The amendments to the Ancillary Document would clearly set out how Shipper and iGT systems are expected to operate with regards to operational queries, following implementation of iGT039. Shippers and iGTs require the change in order to understand how operational and invoicing queries are resolved under Single Service Provision.

### Solution

The solution is to change the 'Pipeline Operator Standards of Service Query Management' Ancillary Document, by creating a distinct section for those operational queries that will be facilitated by the Transporter Agency on behalf of the Pipeline Operator under Single Service Provision.

### Relevant Objectives

The Proposer and the Workgroup believe this change facilitates Objective (d) - Securing of effective competition, and Objective (f) - Promotion of efficiency in the implementation and administration of the Code, as the change would confirm the standards applicable for the resolution of queries following the implementation of iGT039.

Without this change, it would be unclear to Shippers how operational queries are facilitated on Transporter systems and the changes Shippers would need to make in order to resolve queries relating to iGT Supply Meter Point data.

### Implementation

The Modification should be implemented at the Project Nexus Go Live date, in conjunction with the delivery of the implementation of Single Service Provision (iGT039).

## 2. Rationale for Change?

As part of iGT039 and UNC0440, iGTs and Shippers have agreed to use a single Transporter Agency for common services and systems and processes required by the iGT UNC. During development of the above Modifications, it was agreed that common processes are to include query management.

As part of development of the common services and systems and processes, the Transporter Agency has now confirmed the operational 'queries' which will be handled on behalf of the iGTs by the Transporter Agency.

The amendments to the Ancillary Document would clearly set out how Shipper and iGT systems are expected to operate with regards to operational queries, following the implementation of iGT039. Additionally, Shippers and iGTs require the change in order to understand how operational and invoicing queries are resolved under Single Service Provision, and to make any system/operation changes that may be required, in time for the implementation of iGT039.

Following discussions at two Workgroup meetings, the Workgroup agreed that the Rationale for Change was appropriate and complete.

## 3. Solution

The solution is to change the 'Pipeline Operator Standards of Service Query Management' Ancillary Document, by creating a distinct section for those operational queries that will be facilitated by the Transporter Agency on behalf of the Pipeline Operator under Single Service Provision.

Following consideration of the Modification and discussion around any alternative solutions, the Workgroup agreed that the solution fully achieved the purpose of the Modification and proposed no further changes. The content of the solution is reflected in amendments to the Ancillary Document (see 9 – Legal Text).

## 4. Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Positive
e) 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.	None
f) Promotion of efficiency in the implementation and administration of the Code.	Positive
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

The Workgroup agreed that this Modification would facilitate:

### Objectives (d) and (f)

The proposer believes this change facilitates Objective (d) - Securing of effective competition, and Objective (f) - Promotion of efficiency in the implementation and administration of the Code, as it will confirm the standards applicable for the resolution of queries following the implementation of iGT039.

Without this change, it will be unclear to Shippers how operational queries are to be facilitated on Transporter systems and what changes Shippers may need to make in order to resolve queries relating to iGT Supply Meter Point data.

As mentioned above amendments to the Ancillary Document would clearly set out how Shipper and iGT systems are expected to operate with regards to operational queries, following the implementation of iGT039. Shippers and iGTs require the change in order to understand how operational and invoicing queries are resolved under Single Service Provision

The introduction of iGT039 will introduce a Single Service Provision and move some processes from the iGT UNC into the UNC; therefore these updates are required to ensure that RPC invoice supporting files are compatible and aligned with the new SSP processes.

## 5. Impacts and Costs

The Workgroup agreed that any costs associated with the changes required to the Ancillary Document would be included in the overall costs of developing and delivering systems in order to achieve the industry driven change of Single Service Provision (Project Nexus).

## 6. Likely Impact on Consumers

The Workgroup considered that there were no likely impacts on consumers.

## 7. Likely Impact on Environment

The Workgroup considered that there was no likely environmental impact.

## 8. Implementation

The Workgroup agreed that implementation of iGT070 must be aligned with the Project Nexus Go Live Date (currently 1<sup>st</sup> October 2015).

## 9. Legal Text

[Revised Ancillary Document](#)

## 10. Consultation Responses

Representations were received from the following parties:

Company / Organisation Name	Support Implementation or Not?
SSE Energy Supply	Supports
E.ON	Supports
npower	Qualified Support
ESP Utilities Group	Supports
Brookfield Utilities	Supports

### Summary of Comments

#### Self-Governance Status

All respondents agreed that iGT073 should be a self-governance change, understanding the Modification to successfully fulfil the criteria for self-governance.

#### Relevant Objectives

All respondents agreed that iGT073 should better facilitate Relevant Objective (f) – Promotion of efficiency in the implementation and administration of the Code. Most respondents also agreed that iGT073 should better facilitate Relevant Objective (d) – Securing of effective competition.

#### Impacts and Costs

One respondent noted that there would be minor development costs for updating process documentation, however no ongoing costs. Some respondents considered that any costs associated with iGT073 were part of the overall costs associated with the implementation of Project Nexus and therefore specific development costs could not be derived.

#### Legal Text

All respondents agreed that the drafted legal text delivers the intent of the Modification.

#### Implementation

All respondents agreed that the Implementation Date for iGT073 should be aligned with the Project Nexus Go Live Date (1<sup>st</sup> October 2015). It was noted by one respondent that the Modification represented a change to governance only and therefore a minimum lead time would be required.

#### Further Comments

One Pipeline User noted that the transition to the new arrangements had “the potential to negatively impact the timely resolution of ‘in flight’ queries...by and large [the respondent’s] experience indicates that iGTs respond to Shipper queries promptly; however more complex queries may take weeks, months or even years to fully resolve. [The respondent] recognises that iGTs have been advised by their Agent that [iGTs] will not be able to load in flight queries into CMS; instead Shippers will need to raise the queries via CMS – effectively raising [in flight] queries for a second time. Some of these queries impact...customers, for example instances of multiple crossed meters

have impact on Suppliers' ability to accurately provide customers with statements. [The respondent] would therefore look for as many ongoing complex queries to be resolved ahead of Single Service Provision to minimise the impact [of] transition".

One further Pipeline User considered that the Modification must be considered in tandem with iGT072 - Non-effective Days for Cutover to Single Service Provision. The Pipeline User their concern with respect to "the lack of queries that will be worked during the non-effective days [period], the impact this would have on [the] consumer experience, and finally the responsibility of the queries as of 1<sup>st</sup> October".

The same Pipeline User noted that "there are also costs associated...due to system changes, but there could also be costs incurred as a result of queries not being resolved and consumer experience being impacted...[the Pipeline User] agrees with the principle of the Modification but requires further clarity.

One Pipeline User noted that "the appendix in the Legal Text removes queries which will be worked under UNC rules as part of Single Service Provision – the Meter Fit Report Query (MFR) has been left within the Legal Text, it is [the respondent's] belief that this process will be part of iGT039 and would be queried under...UNC processes. It is recommended this query is also removed from the documentation as part of the delivery of this Modification".

## 11. Panel Discussions

*This section should contain a summary of the discussions held at the Panel meeting at which the FMR was raised.*

Panel will discuss this Final Modification Report on 20<sup>th</sup> May 2015.

## 12. Recommendation

Having considered the Modification Report for iGT073S, the Panel determines:

- That proposed self-governance Modification iGT073S be made; or
- That proposed self-governance Modification iGT073S not be made.