

Consultation Response

iGT078: Adding an Ancillary Document to the IGT UNC for the new connections process

Responses invited by: 14.01.16

Respondent Details

Name: Jenny Rawlinson

Organisation: Brookfield Utilities

Support Implementation ☐

Qualified Support ☒

Neutral ☐

Do Not Support ☐

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

Brookfield Utilities supports the principal of standardising the new connections registration process. The workgroup has taken the opportunity to update data items included within the current registration communication.

However, the reason for qualified support is pending a small change to the formats. The Market Sector Code is currently within the Header but, instead, should be within the PS1.

As we consider this to be a non-material change, we would recommend that it is approved at Panel and the amendment made prior to implementation.

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?

Yes. We agree that this modification should be a self governance modification.

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

See reference to error within the Header Record, as stated above.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree with the Proposer and Panel's view that the modification better facilitates Objective d) as accurate data and processes support competitive practices, and Objective f) in that this change will improve governance arrangements and, therefore, the administration of the Code.

Impacts and Costs

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

Brookfield would experience process and system changes as a result of implementing this modification. Costs have not been quantified. It is envisaged that current ongoing costs to manage this process would not increase.

Implementation

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

Brookfield would require a minimum of six months to implement changes to systems. With current competing system development priorities, we would support any additional development time in excess of six months.

Legal Text

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

We are satisfied that the legal text meets the requirements of the intent of this modification to standardise the new connection registration (prior to meter installation) process.

Further Comments

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

Whilst this particular issue will not be introduced as a result of the implementation of this modification, we feel it prudent to highlight a potential issue that has been identified as a result of the review of the proposed legal text for iGT078 and iGT079. iGT079 is currently at the workgroup stage.

Post Nexus/SSP implementation, Xoserve will carry out a process whereby they confirm the “elected” shipper notified to them by the iGT subsequent to the PSR/new connection registration process. This is understood to be an additional process to the new connections registration process, to facilitate shipper registration on the Xoserve database only. It was not envisaged that the confirming shipper could be one other than the elected shipper/that shipper confirmed by the iGT during the new connection registration process. However, Xoserve have confirmed that this could be the case and would, replace the shipper confirmed by the iGT.

This activity will be carried out post meter installation and, thereby, the confirmation will be actually processed in respect of an established supply point, rather than a new supply point. The flaw in this activity is that the current shipper (registered via the PSR process) would not receive a withdrawal notice and would not, have the opportunity to object. It should be noted that the likely numbers of “other” shippers confirmed in these circumstances is low.

This concern has been discussed at the iGT Modification Workstream where iGTs and shippers agreed to convene a focus group, with Xoserve involvement, to agree a satisfactory resolution to this matter. It is emphasised that the solution should not replace the iGT new connection registration process as that could have a significant impact on the iGT commercial operations.

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