

**Consultation Response**

iGT078: Ancillary Document for New Connections Process

Responses invited by: 08 Mar 2015

**Respondent Details**

Name: Anne Jackson

Organisation: SSE Supply

Support Implementation	<input type="checkbox"/>
Qualified Support	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Do Not Support	<input checked="" type="checkbox"/> x

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

The modification has not addressed the metering competition issue that we have raised and are concerned about. For that reason we are unable to support this modification.

We support the intent of the modification as we believe that this brings some efficiency but are not in support of the process described in the modification to do that.

## 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?**

SSE does not agree that this modification is self-governance. This modification impacts two markets (a) the new connections market and (b) the meter fitting and provision market.

As the process is designed, if the MAM field is populated by the IGT, the shipper has to reject the flow to enable it to populate the MAM field with their supplier's choice of MAM. This means there are two iterations of the file required in order to use an independent MAM as opposed to one if the IGT MAM is used. In addition and due to this, the process of getting a connection can also be delayed.

This indicates that the process 'playing field' is not level for all MAMs and we therefore assert that this process impacts competition in metering.

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

The document contains several references to 'shipper' and 'supplier' and uses these terms interchangeably, without a logical reason for so doing. For contractual purposes, we would wish to see adoption of the term 'shipper', as the term 'supplier' is not recognised in the iGT arena

## Relevant Objectives

**How would implementation of this modification impact the relevant objectives?**

This process has a potentially negative impact on competition in metering, which neutralises any positive impacts.

We agree that the intent of this modification if delivered appropriately should positively impact:

### Relevant Objective D)

More accurate data will support the CoS process and thus support competition between Suppliers.

### Relevant Objective F)

This change will improve governance arrangement and therefore improve administration of the Code.

## Impacts and Costs

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

We believe that this process could offer efficiencies and an opportunity to semi-automate the process. However this is dependant on all iGT's interpreting the ancillary document in the same way. This assumption has proved challenging for similar implementations in the past.

## Implementation

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

We would like to have a lead time of at least 6 months from approval for implementation to allow us to marry up our processes with the Nexus implementation.

## Legal Text

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

Not reviewed for the Code.

However as is common with many of the IGT ancillary documents, we believe there will be latitude for multiple interpretations by parties and this will in itself lead to inefficiencies.

## Further Comments

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

We believe that the metering competition issue could be resolved if

- (a) The iGT did not pre-populate the MAM field so that it can be populated by the shipper or by allowing the shipper to alter the MAM field in its first response back to the iGT.
- (b) iGT were able to produce evidence that they have been requested to provide and fit a meter by the customer when requested by the shipper on behalf of their supplier.

This could be added to the legal text as an additional

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**