

Consultation Response

iGT078s: Ancillary Document for the New Connections Process

Responses invited by: 08/03/2016

Respondent Details

Name: Cher Harris

Organisation: Indigo Pipelines

Qualified Support for Implementation

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

We understand Shipper's desire to implement a standardised PSR file format across all IGTs, in order to reduce complexity of processing different formats at their end. Benefits to the Transporters of making these system changes are not so obvious.

In our experience, very few Shippers participate in the New Connections market, so any change that encourages them to take on New Connections would benefit customers and the industry as a whole.

We cannot commit to reissuing all historic PSRs in the new format, we are only able to agree to sending all new PSRs, from implementation date, in the new format. It would take a huge manual effort to revise all historic PSRs, for no benefit whatsoever to the Transporter. Where an old job is revised as a result of genuine business activity, if the PSR needs to be reissued to the Shipper it will be sent in the new format. This is our understanding of the Proposer's intention and we have given qualified support on this basis.

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?

Agree that this is a self governance modification

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

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Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Agree that this will support Objective D – the new connections market is quite limited in terms of shipper participation, this modification may encourage more shippers to take on new connections.

Impacts and Costs

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

A detailed cost breakdown has not yet been obtained from our IT service provider but would be fairly significant as it requires a complete redesign of the PSR process in our database. As New connections work is critical to our business it will need thorough testing.

Implementation

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

This Mod requires us to make changes to a critical business process, it will therefore require careful development and thorough testing. As such we require 6-9 months implementation lead time. However, all our development resource is currently fully occupied on SSP & RGMA implementation, and we do not feel it would be appropriate to divert this resource away from SSP & RGMA, therefore we would be looking to implement 6-9 months AFTER SSP Implementation on 01/10/16 (i.e. Q2 2017).

Legal Text

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

Yes

Further Comments

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

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