

Consultation Response

iGT078 - Ancillary Document for the New Connections process

Responses invited by: 08.03.2016

Respondent Details

Name: Kish Nundloll

Organisation: ESP

Support Implementation ☒

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

ESP is happy with the purpose of this modification and accepts that the proposer has made every effort to incorporate views from all parties. The modification will hopefully help consolidation with the New Connections Process.

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?

ESP believes that this does meet the self-governance criteria.

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

ESP believes that the issues stated in our previous consultation responses have been discussed and been addressed.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

ESP agree that the relevant objectives suggested by the proposer would be met through this modification , with particular emphasis on objective F.

Impacts and Costs

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

N/A

Implementation

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

ESP are mindful that implementation has been discussed and aligned with SSP go live, but in order for iGTs to all fully adhere to the requirements and have a consistent and fair approach, ESP are keen to allow sufficient time for all parties to confidently make required changes and not cause unnecessary delay to users. ESP also believes the two (SSP and Mod) are not dependant on one another. ESP therefore accept that Q1 2017/Feb 2017 be the suggested implementation date.

ESP supports implementation.

Legal Text

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

The legal text is robust and clear and ESP believes it to be sufficient enough to benefit the modification.

Further Comments

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

A note on a previous respondents comments that IGTs would receive a competitive advantage as a MAM. This is a claim that ESP refutes and is disappointed at any insinuation that suggests ESP would gain a competitive advantage because IGT's pre-populate the MAM field with their own MAM. ESP would be at the customer's request and it should be explained that under the current process, there are no examples of IGTs incorrectly pre-populating the PSR with their MAM ID and that should the MAM ID be pre-populated incorrectly, if a shipper acts promptly an amended PSR should be achievable within the 30 day industry timescales.

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