

iGT UNC / iGT INC Consultation Response

Date	11/12/09
Reference	IGT026 Consultation
Title	Please enter the Title of the Modification here. Password Protection Protocols for Invoice Supporting data and Portfolio Extracts
Respondee	(Please enter the name of the company you are replying on behalf of) Lorraine McGregor, ScottishPower Energy Management Limited
Position on the Modification	Qualified support for Modification
<p>Facilitation of the relevant objectives</p> <p>How this proposal will, if implemented, better facilitate the “code relevant objectives”, as defined in Condition 9 of the Gas Transporters Licence.</p> <p>ScottishPower Energy Management Ltd (SPEML) supports the principle of this Proposal and do agree with the Proposer that the introduction of standard password protection principles will promote efficiency in the implementation and administration of the iUNC.</p> <p>However, although we believe password protection could be an acceptable measure to reduce risk we would prefer encryption to be used, such as secure FTP. While we recognise the MOD has been written in such as way to introduce password protection as the minimum baseline standard, so does not prevent bi-lateral agreements to introduce other measures, our preference would be for the minimum to be secure FTP. Efficiency will only be introduced if we can work the same way with all iGTs and do not have a desire to work with different standards with different iGTs. We recognise that the rationale for utilising password protection over secure FTP was the potential cost barriers for some of the smaller parties. However, our IT department have confirmed that secure FTP software can be purchased for a couple of hundred pounds assuming you have some basic IT infrastructure, and own the domain.</p> <p>So, in summary SPEML are supportive of introducing security protocols for data transfer between iGTs and Shipper/Suppliers and believe password protection is better than the current position, but we would prefer a more secure way of sending data, with our preference for secure FTP.</p>	
<p>Additional Information and Comments</p> <p>The proposal does not specify the mechanism of how passwords will be sent from Pipeline Users to Pipeline Operators. We would not welcome this being via e-mail, so would suggest that passwords are provided via the telephone.</p>	

Completed forms should be returned to the iGT UNC Representative, Gemserv Ltd at IGT-UNC@gemserv.com or faxed to 020 7090 1001