

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	28/11/07
<b>Reference</b>	UGI034 GPL042 GTC343 Consultation
<b>Title</b>	Mandatory Use of File Formats for COS
<b>Respondee</b>	Colette Baldwin E.ON UK
<b>Position on the Modification</b>	<del>Support Modification</del> <del>Qualified support for Modification</del> Do not support Modification
<b>Facilitation of the relevant objectives</b>	
<p>We do not believe that this modification better facilitates the relevant objectives as the modification is seeking to introduce industry file formats into only the GTC/GPL/UGI short-form codes. We believe it would be more co-ordinated, efficient and economic for the iGTs to consider a standard approach to the Change of Supplier process as the large GTs do, and as outlined in the Review Proposal considering the utilisation of UK Link file formats for the Change of Supplier process. All transporters, shipper/suppliers need to exchange the same information, and so a co-ordinated mechanism would be the most efficient.</p> <p>Since the iGTs have recognised the need to move to an iGT UNC which provides efficiency in administration, it seems incongruous to expand the individual short form codes for what is in essence a standard industry process, and surely an iGT UNC modification would be more efficient.</p>	
<b>Additional Information and Comments</b>	
<p>We are supportive in principle of the introducing governance in to the area of standard file formats for the Change of Supply Process, and acknowledge that GTC/UGI/GPL are trying to bring governance to an area currently managed by consensus. However it is disappointing that this modification has been raised as a short form network code modification at a time rather than a iGT UNC modification when the iGT UNC Modification Panel have commissioned a review group to consider a different modification which seeks to bring in a standard approach for all iGTs to use in the Change of Supply process. Whether or not that modification succeeds, we would not be supportive of a solution which further fragments the approach by iGTs to formal governance and promotes a diverged solution for the industry</p> <p>Similarly, the advent of the iGT UNC brought about the co-ordinated approach by the iGTs to industry design and governance, and it should be our endeavour to reduce the content of the short form codes as we look to bring further governance to areas that we have so far managed by agreement - achieved in detailed discussions in industry workgroups, and bring those into the main iGT UNC Document.</p>	

Completed forms should be returned to the iGT UNC Representative, Gemserv Ltd at [iGT-UNC@gemserv.com](mailto:iGT-UNC@gemserv.com) or faxed to 020 7090 1001