

(by e-mail)

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21<sup>st</sup> September 2007

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Dear Sirs

**iGT UNC Modification 007v – iGT RPC Invoice Template**

Thank you for giving ScottishPower the opportunity to respond to the above Modification Proposal. ScottishPower support the implementation of this Modification.

ScottishPower were fundamentally involved in the development of the RPC invoice template and believe standardisation of RPC invoicing is essential in order to provide Shippers with the necessary information to conduct robust invoice validation and efficiently manage this process. As the Modification states the competitive market is hampered by the lack of standardisation across iGT processes, resulting in a number of manual operations. The standardisation of this template will allow parties to develop more advanced processes and/or systems to process RPC invoices. This benefits both Shippers and iGTs.

Although the template is currently used by iGTs ScottishPower welcome the transfer from working practice into the formal governance regime, i.e. iGT UNC. We agree with the Proposer that the introduction of the template into the iGT UNC will ensure all parties are using the correct format and version, as well as providing certainty to new market entrants.

The inclusion of the template into an Ancillary Document will afford flexibility between agreeing minor changes via the iGT UNC Modification Panel and utilising the formal Modification Procedure, where appropriate.

With regards to the Proposed Legal Text, we would suggest the text should be extended to state that the RPC Invoice Template is contained within the Ancillary Document of the iGT UNC.

Please do not hesitate to contact me should you wish to discuss this response further.

Yours sincerely

Lorraine McGregor  
Energy Commercial  
ScottishPower