

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	7 <sup>th</sup> February 2008
<b>Reference</b>	iGT013v/iGT014/iGT015v Consultation
<b>Title</b>	<ul style="list-style-type: none"> <li>• Inspection Notification File Formats &amp; Response File</li> <li>• Insert Document entitled "iGT Meter Reading Validation Rules and Rejection Codes" within iGT UNC</li> <li>• Use of Unbundled Meter Reading File Formats and Response Files for Cyclic Meter Readings</li> </ul>
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<b>Position on the Modification</b>	Support Modifications

### Facilitation of the relevant objectives

RWE npower believe that these modification proposals will facilitate both the "co-ordinated, efficient and economic operation of the pipeline system" and the "securing of effective competition between relevant shippers and suppliers". Implementing standardised file formats and procedures will allow both Users and Operators to develop automated processes rather than maintaining the current manually intensive workarounds that both face. Having a consistent method in which to transfer data (meter reads and meter inspections) will give confidence within the iGT market that data is being handled in a robust manner which consequently should improve the quality of data within Users and Operators systems. The knock on effect of which should be seen in relation to the performance of the AQ Review and the ability to undertake I&C reconciliations.

Suppliers discharge their Standard Licence Condition 12 through the submission of meter inspection notifications to the Operators. Currently Suppliers are not confident that this information is being accepted and so are unsure if they're meeting their statutory obligation. These file formats will provide reassurance to Suppliers that meter inspection notifications are being actively managed and that the information provided during change of supplier is accurate.

We envisage that implementing these file formats and associated validation rules will help Users align the management of end consumers connected to independent networks with that of the large transporters. Integrating the management of end consumers will help Users reduce their management and operational costs thus facilitating competition between Suppliers.

## Additional Information and Comments

As these modification proposals all deal with the management and operation of the iGTs Meter Reading regime we have decided to submit one response to cover them all.

Unlike the Large Transporters the Independent Gas Transporters have not been required to operate via a single agency or in fact use standardised file formats for the transfer and management of customers within the competitive supply market. This has resulted in Users having to develop bespoke systems and processes and in some cases separately resource the management of data flows etc between themselves and the Operators. RWE npower believe that these modification proposals will help to form the basis of the integration of the management of customers, regardless of which gas network they're connected to.

The proposals have been based on work by the Gas Forum iGT Workgroup that resulted in the document " iGT Meter Reading (Cyclical Reads) & Meter Inspection File Formats" which was produced in October 2003. We understand that this document was agreed by User and Operator representatives as the preferred approach for the management of meter readings. However, due to the disparate governance arrangements (at that time) the approach within this document was never formalised and so was placed onto the Gas Forum website to operate more as a Code of Practice. Implementing these modification proposals will provide market participants (including new entrants) with a definitive set of procedures and corresponding file formats to follow. Until such time, that there are formal arrangements in place we do not feel it appropriate that Operators should reject meter reading related submissions from Users purely on the basis of file formatting and should continue to support the working conventions originally in place until such time that these modification proposals are implemented.

Accurate meter reading data is an integral part of many industry processes, such as AQ Review and performance of I&C reconciliations, not forgetting its essential nature in relation to the end consumer receiving an accurate bill. Implementing these modification proposals will bring transparency to the process which participants currently don't have. This in itself will provide confidence in the robustness of the processes, as parties will become accountable for their performance.

To aid the accuracy of the meter reading data the proposals seek to introduce some basic validation rules for both Users and Operators. Applying a set of tolerance checks to cyclic meter readings prior to submission to the Operator and for Operators to provide a backstop validation will allow the active management of AQ data as any anomalies will be picked up and dealt with before they have any detrimental impact further on, i.e. erroneous AQs.

Notwithstanding the importance of the accuracy of meter reading data it is worth noting that these modification proposals seek to implement the unbundled file formats for Meter Inspections which would provide the mechanism for Users to discharge their Standard Licence Condition 12 obligation. Implementing these specific file formats will provide certainty to Users that last meter inspection dates sent by the Operators during Change of Supplier are accurate and furthermore that meter inspection notifications sent by Users are actively managed by Operators giving comfort to Users that they are fulfilling their statutory obligations.

It is clear that RWE npower supports the initiative to standardise the meter reading regime. However, we would like to draw your attention to work ongoing outside of this area which we feel needs to be considered in line with these modification proposals. Currently, there is a Development Workgroup (iGT004 Supply Point Administration (SPA) File Formats - mandating the use of File Formats for SPA purposes) which is working on introducing a set of standardised Residential and Industrial Commercial Change of Supplier flows. Development Workgroup reports indicate that work is going well with Users and Operators alike, agreeing that there needs to be a change to the current regime. Whilst RWE npower is pleased to see that progress is being made in this area we still strongly advocate the use of a single service provider thus allowing Users to develop one interface and operate in a manner similar to that of the Large Transporters. If the provision of services by a single provider is proven not to be a feasible solution than we would concede that introducing a set of standardised SPA formats would be an improvement on the current situation.

To this end, we would prefer that both the meter reading and change of supplier file formats are developed and implemented together. We feel taking a fragmented approach by adopting the meter read file formats followed by the SPA flows isn't the most cost effective approach for either party. Bundling the changes will allow all parties to schedule the changes in an efficient, economic and orderly manner and reduce the risk and thereby costs by ensuring User/Operators have sufficient time to plan resources for implementation.

Nevertheless, we appreciate that work relating to the meter read file formats has been ongoing for nigh on 3/4 years without some final outcome/resolution and so understand the rationale behind the modification proposals. RWE npower supports the implementation of these file formats with a 6 month implementation lead time (from Authority's decision) as it doesn't want to hinder progress that will prove beneficial to Users, Operators and ultimately the end consumer.

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