

iGT UNC DMR Response

Date	17 April 2009
Reference	iGT024VAV DMR
Title	Inspection Notification and Cyclical Read File Format and Response File - Clarification of File Naming Convention - Consecutive
Respondee	Envoy
Position on the Modification	Support Modification

Facilitation of the relevant objectives

How this proposal will, if implemented, better facilitate the “code relevant objectives”, as defined in Condition 9 of the Gas Transporters Licence.

a. the efficient and economic operation of the pipe-line system to which this licence relates;

- The use of Consecutively numbered files will make it very clear when a file has been missed. As the Shipper is responsible for investigating and resolving any issue with the missing file, consecutive numbering will enable the Shipper to resolve the issue with very little or no iGT involvement as the Shipper can check which acceptance or rejection files have been received. This minimal iGT involvement in the rejection process will facilitate the efficient and economic operation of our pipeline system.

b. so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters;

- Relevant Objective A is not Envoy specific as can be equally beneficial to all other Gas transporters. Therefore Objective B is facilitated.

c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence;

- n/a

d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers;

- Consecutive numbering will act as an incentive for the shippers to submit files in the correct formats and within the correct timescales as Shippers’ time and resource will be used to resolve any errors. This incentive will therefore improve efficiency and consequently minimise costs which will secure effective competition between Shippers and the relevant Suppliers.

e. so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers;

- n/a



f. so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition;

- This proposal promotes clarity to an already approved suite of modifications and consequently promotes efficiency in the implementation and administration of the network code.

Additional Information and Comments

Envoy supports this Modification on the basis that it believes that consecutive file numbering will prove more efficient than sequential numbering as it will make it very clear when a file has been missed. Furthermore, as the Shipper is responsible for investigating and resolving any issue with the missing file, consecutive numbering will enable the Shipper to resolve the issue with very little or no iGT involvement as the Shipper can check which acceptance or rejection files have been received. Envoy also believe that this method will also encourage the Shipper to work efficiently by introducing an incentive not to miss files as files as any subsequent files will be rejected - there is no incentive for efficiency with sequential numbering.

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

