

iGT UNC / iGT INC Consultation Response

Date	16 th January
Reference	iGT043 Modification Proposal Consultation
Title	Consolidation and Alignment of IGT Invoicing
Respondee	Colette Baldwin – E.ON
Position on the Modification	Qualified support for Modification

Facilitation of the relevant objectives

How this proposal will, if implemented, better facilitate the “code relevant objectives”, as defined in Standard Condition 9 of the Gas Transporters Licence. For those answered Yes to, please provide a detailed explanation below the table.

<i>Relevant Objective</i>	<i>Yes/No</i>
a. the efficient and economic operation of the pipe-line system to which this licence relates	
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	
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	Yes
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	
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	Yes
g. so far as is consistent with sub-paragraphs (a) to (f), the compliance with the Regulation* and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators	

* Regulation 2009/715/EC of the European Parliament and of the Council of 13 July 2009

Relevant Objectives to be better facilitated:

D and F are better facilitated by the introduction of these changes, as improvements in transparency of data around charges will ensure that Pipeline Users have the most accurate information upon which to validate charges received and will additionally ensure a consistent approach to the population of the data in these files which are currently not delivered in accordance with the file formats. The alignment of the data provision requirements where the same source data is provided for both the invoice and portfolio extracts should remove redundant data processing by both Pipeline Operators and Users.

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Likely impact on environment?

How this proposal will, if implemented, impact on greenhouse gas emissions? None

Implementation issues including impact on your systems

This has system impacts for us as we have validation routines around portfolio and invoicing data, however we would like to see this modification implemented as quickly as possible to remove much of the manual work-arounds we have in place.

Additional Information and Comments

We have reviewed the template of the file format and would suggest the following points be considered (please see the attachment which provides additional information):

- Field types and lengths are different to the portfolio, would be beneficial for these to match:
 - CSEP number (item 2) set to number but they are not all numeric so would be better as text
 - EUC (item 10) set to 4 characters but 8 on the portfolio, our preference would be 8 to reflect industry standard so WAR bands can be included
 - SOQ (item 12) set to 10 on the portfolio but 12 on the proposal
 - LMN (item 14) only requires to be set to text as this is alphanumeric and matches the portfolio rather than N/T
 - MSN (item 20) set to 15 but portfolio is 16, would prefer it to be 16 to match the portfolio
- To assist meter rental validation we'd like to suggest including the meter model, currently this is available in the portfolio; however, it could be beneficial for it to be included in the RPC template.
- The inclusion of AQ and SOQ fields (items 12, 17, 18, and 19) are classed as mandatory for RPC supplies, however, the RPC template is for I&C and domestic supplies so these fields could possibly need to be conditional with a slightly amended description to ensure they are completed correctly.
- The proposal suggests removing the Meter Reading Charge - a suggestion would be to keep this field and to include some more data items specifically relating to Forced Estimated Readings because currently they come in adhoc formats from the iGTs and if we are bringing in one template the industry might benefit from including this.
 - The suggested additional fields would be estimated read date and estimated reading because all other fields would be completed in the RPC mandatory requirements
 - If FERs are challenged and require a refund they could be issued using the B13 RPC adjustment row (if the group agrees to it's inclusion)

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Appendix-RPC-Backi
ng-data-Modification-

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