

IGT UNC / iGT INC Consultation Response

Date	18/1/12
Reference	iIGT043
Title	Consolidation and Alignment of IGT Invoicing
Respondee	Stuart Crossey, Energetics Gas
Position on the Modification	Do Not Support 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.

Relevant Objective	Yes/No
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	
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	
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:

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Likely impact on environment?

None

Implementation issues including impact on your systems

This proposal would take system development time and effort and a minimum of 6 months implementation time from the authority's decision would be required for implementation.

Additional Information and Comments

Energetics sees no problem in removing IGT UNC Appendix G-1 RPC invoicing and replacing it with an ancillary document but in the format as highlighted in IGT007, the information presently submitted on the RPC invoice template should be sufficient to validate the monthly transportation charges. We agree that this format should be standardised and used by each iGT.

The majority of additional fields requested to be added by this modification are calculated fields, the shipper should have all the information to carry out these calculations and build them into their validation routines.

Energetics Gas already provides the backing data for both domestic and commercial charges on one file and would therefore not be impacted by this part of the proposal.

I do not believe there is a set way to deliver the file (spreadsheet, csv, txt) With this in mind I do not believe the data format should be DD/MM/YYYY, but rather "YYYYMMDD" in line with other industry standard file formats.

If the modification is proposed it may make sense to stipulate the file type which is to be used in order that a set import routine can be developed by each shipper to import the file. Furthermore, the modification makes reference to nested sites, it seems sensible that an additional field be added to the RPC template to identify which sites are nested and which therefore do not require the CSEP billing AQ field to be completed.

In summary, Energetics could add the additional fields to the proposed template but this would take system development time and effort, this being



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the case we would require a minimum of 6 months notice from the Authority decision.

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