

iGT UNC / iGT INC Consultation Response

Date	17 January 2012
Reference	iGT043 Modification Proposal Consultation
Title	Consolidation and Alignment of IGT Invoicing
Respondee	Trevor Peacock, Fulcrum Pipelines
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.

<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	
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:

Likely impact on environment?

How this proposal will, if implemented, impact on greenhouse gas emissions?

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Implementation issues including impact on your systems

Fulcrum do not feel that this modification is required as this information is already available to the Shippers as long as the invoice backing data meets the requirements of the iGT UNC Appendix G-1.

Some of the results may need the understanding of the RPC document and may need the parties concerned to carry out relevant calculations in order to be able to extrapolate the information but the Shippers could do this just as well as the iGT's do using the information that is available to them.

Therefore, it would seem that the provision of this data removes some of this effort for the Shippers and as such would only benefit them.

Fulcrum could add the additional fields / data into the invoice backing data but in order to do this we would have to carry out some development and amendment to our systems. But as the only beneficiaries seem to be the Shippers then we feel that the implementation of this mod should be funded by the shippers.

If the mod is to go ahead then please find below our anticipated timescales associated with the additional fields / data required on the invoice backing data.

SOQ Agreed at time of RPC Entry

This information is something that is already stored within Fulcrums system and as such the amendment required would be fairly minor, i.e. the layout of the backing data spreadsheet would be revised to include this data and the data would be extracted from the system and added to the spreadsheet.

Approx. development time - 8 weeks from instruction to proceed from authorising body.

iGT CSEP Billing AQ

This information is something that is already stored within Fulcrums system and as such the amendment required would be fairly minor, i.e.

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the layout of the backing data spreadsheet would be revised to include this data and the data would be extracted from the system and added to the spreadsheet.

Approx. development time - 8 weeks from instruction to proceed from authorising body.

iGT CSEP Billing SOQ

Whilst this information is used in the calculation of the transportation charges, it is not currently recorded in our database and as such some development will be required to identify the data required and collate it into a figure that can be given in the invoice backing data

Approx. development time - 12 weeks from instruction to proceed from authorising body.

Shipper CSEP AQ after AQ Review (CSEPs)

Andrew Margan has clarified that this detail should be a collation of the CSEP AQ value to reflect the shipper's portfolio as a snapshot at the end of each month. Whilst this data will be recorded within FACTS in separate fields, it is not currently collated on a monthly basis to provide this figure. Therefore, some development will be required to identify the data required and collate it into a figure that can be given in the invoice backing data

Approx. development time - 12 weeks from instruction to proceed from authorising body.

LSP customer corrector charge

This information tends to be specified by the MAM and only relates to installations where Fulcrum is responsible for the meter installation. At this time, Fulcrum does not currently have any installations where they would charge the shippers for this element.

However, in order to ensure that this field was incorporated into the invoice backing data, development will be required to identify the data required and collate it into a figure.

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Approx. development time - 12 weeks from instruction to proceed from authorising body.

Meter Type

This information is something that is already stored within Fulcrums system and as such the amendment required would be fairly minor, i.e. the layout of the backing data spreadsheet would be revised to include this data and the data would be extracted from the system and added to the spreadsheet.

Approx. development time - 6-8 weeks from instruction to proceed from authorising body.

Transportation Rate at time of RPC entry

This information is something that is already stored within Fulcrums system and as such the amendment required would be fairly minor, i.e. the layout of the backing data spreadsheet would be revised to include this data and the data would be extracted from the system and added to the spreadsheet.

Approx. development time - 6-8 weeks from instruction to proceed from authorising body.

Additional Information and Comments

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