

iGT UNC / iGT INC Consultation Response

Date	17/01/2012
Reference	iGT043 Modification Proposal Consultation
Title	Consolidation and alignment of invoicing data
Respondee	Cher Harris - SSE Pipelines Ltd
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	N
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	N
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	N
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	Y
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
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	N
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	N

* 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?

None

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Implementation issues including impact on your systems

We support the principle of aligning the domestic and I&C UoS Invoice backing data templates, however we do not agree with merging them into a single backing sheet. For the purposes of management/financial reporting, we still intend to produce separate backing data sheets for domestic and I&C, albeit in the same format.

We do not currently hold all of the additional data items proposed for inclusion in the new template. As such, we need to make systems changes to store the additional data and then extract it onto the backing sheets. In particular, we do not currently capture the 'Agreed SOQ at RPC Entry', so would appreciate further clarification of why this is required.

'Shipper CSEP AQ after AQ Review' requires further definition as to how/when this is calculated. For example, it could be calculated at a point in time (e.g. last day of the month) or it could be taken from the last update to xoserve.

Due to the number of system changes required to implement this proposal, we will require 6 - 9 months lead time from Authority decision.

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