

iGT UNC / iGT INC Consultation Response

Date	14 December 2012
Reference	iGT050 Modification Proposal Consultation
Title	iGT & Shipper Metering Communications Ancillary Document
Respondee	Adam Pearce, ESP
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	YES
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:

Objective C - Pipeline Operators are required under their Transporter Licence Conditions to hold information in respect of supply points and for that information to be accurate. This information includes the metering installed at the premises that are connected to their pipeline system. By creating standard file formats and business

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rules for the provision and updating of information to the Pipeline Operator to be held in the Supply Point Information Service (Register), this modification will better facilitate this relevant objective.

Objective D - Shippers and Suppliers will have confidence that the metering information they are provided with on a change of supply is accurate and by ensuring there is a standard process and timeframes for updating information, customers accounts will be set up correctly and so suppliers will not have to face costs associated with un-billing, correcting data and then re-billing. Customers will have confidence in the accuracy of their data and this will help improve their confidence in the change of supply processes.

Objective F - By having a single process and clear rules/formats and consistent timescales Pipeline Operators and Pipeline Users will be able to automate these processes and avoid the less efficient and more expensive manual processing currently being used.

Likely impact on environment?

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

None.

Implementation issues including impact on your systems

A period of 9 months will be required for implementation.

Additional Information and Comments

It is the view of ESP that the iGT50 modification goes beyond what is required to ensure GT 3rd party meter asset information is accurate and up to date.

With the on-going development of iGT039, Single Service Provision (SSP) is set to come into effect in 2015. Through SSP, iGTs will be able to communicate with shippers using full RGMA. The time required for Ofgem to make a decision and a 9 month implementation period will take us into 2014. If Single Service Provision goes ahead, then the benefits received from either the iGT50/50A modification will only be realised for a period of between 12 and 24 months (assuming the Nexus/SSP go live date will be 2015, with shippers and transporters pushing for SSP to be the first element of Nexus to go live).

ESP is concerned with both the cost of and the level of testing that would be required for what will (likely) be a temporary measure. ESP would have no choice but to automate the RGMA flows described in this mod's ancillary document, costing a great deal in systems development and resources required for testing. ESP understood that the basis of iGT50 was to ensure that information in relation to third party meters is accurate and up to date using a standardised process. This can be achieved without the level of expense and lengthy period of testing required to implement the automated RGMA flows, through GTC's iGT50A mod.

GTC's iGT50A modification gives each party the option to automatically process the relevant flows/files, or where in the case of either shipper or transporter parties, the resources required for doing so are excessive, parties will have the option to manually

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process 3rd party metering updates until such a time as the industry is clear if and when SSP will be going ahead.

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