

iGT UNC / iGT INC Consultation Response

Date	29 th January 2013
Reference	iGT050 DMR Consultation
Title	iGT & Shipper Metering Communications Ancillary Document
Respondee	Trevor Clark E.ON
Position on the Modification	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:

Please see earlier response to the Modification Proposal Consultation.

Likely impact on environment?

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

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None

Implementation issues including impact on your systems

Please see earlier response to the Modification Proposal Consultation.

Additional Information and Comments

Having had the opportunity to review and consider the responses provided by parties to the Modification Consultation stage of iGT050, E.ON would like to respond to some of the comments raised against this Modification:

- iGT039 (Single Service Provider) was used as a reason not to support iGT050 by a number of Pipeline Operators with the belief that as RGMA would be delivered under SSP, iGT050 would end up as short term solution. First and foremost E.ON's view is that iGT039 is by no means guaranteed, neither is the proposed implementation date of 2015. Even if (as we hope) iGT039 is implemented in 2015 we do not feel that there is a conflict with the implementation of iGT050, instead the transition to SSP for Shipper's would be more seamless as RGMA type flows would already be in use.
- Some Pipeline Operators commented that iGT050 would be a more complicated change to implement over the 'simpler' iGT050a. For Pipeline Operators this may be the case, however for E.ON (and we suspect all Shippers) we would argue that iGT050a does not provide a 'simpler' option. Shippers currently use RGMA flows to communicate with large Transporters and their production is inherently built into Shipper systems, therefore iGT050 would be the simpler 'Shipper' solution.
- One Pipeline Operator raised concerns with the 'incomplete' validation within iGT050 which may possibly lead to parties building their systems to different specifications. Unfortunately no detail was provided to substantiate these concerns, however E.ON would like it noted that the iGT050 file formats are existing formats that have been successfully utilised by a number of Industry Parties for some years now.

E.ON would also like to re-iterate the benefits that we believe would be delivered by iGT050 over iGT050a:

- Under iGT050 Shippers would only need to introduce one set of changes to deliver RGMA flows. (Under iGT050a system development work would be required to automate the solution with additional system development work later needed to introduce RGMA flows when and if SSP is delivered.)
- iGT050 will deliver automation in the flow of metering data between Parties, we believe this provides less opportunity for human error to affect both the quality and accuracy of data, in turn this should result in a more efficient and cost effective experience for both Industry Parties and Consumers.
- With the roll out of Smart Metering continuing to gather pace the requirement for a

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robust automated exchange of metering information is more important than ever. We're concerned that should iGT050a be implemented over iGT050 some Pipeline Operators would continue to process data manually and may subsequently experience a lack of available resource to cope with future anticipated volumes.

Since we provided our response to the iGT050 Modification Consultation we've identified some guidance provided by Ofgem to various Industry Parties in 2005 (an e-mail sent out by Nicholas Rubin 3rd Oct 05 - copy available on request). This e-mail sought to clarify iGT compliance with the RGMA baseline, I've copied an excerpt from this e-mail below:

"However, if a supplier insisted on installing their own meter on an iGT supply point, then the iGT would be required by the SPAA to manage the consequential exchange of data in accordance with the RGMA baseline (to the extent that the baseline required it). Note that the baseline does not mandate the means by which the data is exchanged, so it could be done by fax etc. rather than IX."

Although this comment makes reference to obligations that exist under SPAA, it's relevant to iGT050 because Ofgem's view shortly after RGMA was introduced indicated that Pipeline Operators should be able to accept RGMA flows for 3rd Party Metering installations on their networks.

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