

iGT UNC / iGT INC Consultation Response

Date	14/12/12
Reference	iGT050A Modification Proposal Consultation
Title	Third Party Metering Activity and MAM ID Communication
Respondee	David McCrone, ScottishPower Energy Management
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	Yes
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	No
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:

The Pipeline Operators are required by their licence to hold information relating to the supply points on their network. By creating a set of standard file formats and timescales by which this information is passed between industry parties this requirement can be met,

iGT UNC / iGT INC Consultation Response

and the pipeline system operated, in a more efficient way. When looking at iGT supply points in isolation this will better facilitate relevant objectives (b), (c) and (f). We do however note that shippers must also consider this in the wider context in which they operate and be aware of the processes for supply points on the large transporters' network.

We do not agree that this proposal better facilitates objective (d). The proposal seeks to formalise 2 new communication flows; Asset Update Notification and MAM ID Notification. We understand that these are loosely based around the existing ONJOB/ONUPD and ONAGE flows respectively but have a number of differences to provide additional information that the proposer wishes to receive. This is different from the existing RGMA and UK Link processes used between shippers and large transporters, and fails to recognise the iGT is actually operating separate MAM and GT functions (for example, iGT050A expects shippers to send a MAM ID Notification, a pseudo ONAGE file, to the iGT acting in its capacity as GT. This is against the principle of RGMA where an ONAGE is a communication with the MAM). Requiring shippers to employ different processes for supply points whether they are on large transporter or iGT networks is inefficient and increases the amount of manual work required. This in turn increases costs to shippers/suppliers and does not facilitate effective competition.

Likely impact on environment?

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

None.

Implementation issues including impact on your systems

While the proposer states that shippers and iGTs are already using these files, our belief was that these were always a temporary measure and were never considered as an enduring solution. This process is resource intensive and were this to be formalised we would be forced to look a more robust solution which would require system development. This would require a minimum 6 months notice after a decision from the Authority to implement. As this would continue to be a different process from that used with the large transporters it would require a higher level of ongoing resource to manage it than compared to iGT050.

We note that there are still some areas where iGTs and shippers may need to discuss implementation and ensure a consistent interpretation of the requirements. We would expect parties could do this in a pragmatic way following any decision to implement, e.g. through the iGT Shipper workgroup.

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