

iGT UNC / iGT INC Consultation Response

Date	13 th December 2012
Reference	iGT050a Modification Proposal Consultation
Title	Third Party Metering Activity and MAM ID Communication
Respondent	Trevor Clark E.ON
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.

Relevant Objective	Yes/No
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	No
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	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	No
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:

We do not feel that this Modification better facilitates any of the Relevant Objectives, instead it formalises existing temporary arrangements that we feel are already inadequate to meet both current and future needs.

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

None

Implementation issues including impact on your systems

Within the Modification Proposal the proposer advises that Shippers are currently using the recommended files, it is necessary to point out that in E.ON's case these files have to be constructed manually which is a very time consuming, expensive and inefficient process. It was intended that these files would be used as a temporary measure until such time as a more permanent and robust process could be implemented, we believe that the original proposal developed through the iGT050 workgroup would deliver this.

With the continuing roll out of Metering Competition and Smart Metering it is expected that the volumes of files generated would increase significantly. Continuing with the manual creation of these files would not be a viable option for E.ON and therefore it would be necessary to automate their production, to build the systems necessary to achieve this would cost E.ON as a minimum double that to extend the use of the existing recognised industry flows proposed under modification iGT050.

Appendix 5 of the Ancillary Document provides examples of rejection reasons for both Asset Update Notification and MAM ID notification files, at the bottom of this list is the following “*NOTE - this is not an exclusive list of rejection reasons. Rejection reasons will be descriptive enough so as to ensure the shipper has complete understanding of the rejection*”. This suggests that unspecified rejection reasons could be used at any time; this approach isn't conducive to the development of a robust automated process and could lead to additional manual handling and therefore increased costs to Pipeline Users. In addition the manner in which File level and Record level rejections would be differentiated from (if at all) is unclear in the Ancillary document.

If implemented E.ON would require a period of at least 6 months to automate the creation and processing of these files, however this would be dependent on the issues notified above being resolved.

Additional Information and Comments

Within the Modification Proposal the Proposer indicated that the likely implementation of iGT039 (Use of a Single Gas Transporter Agency for the common services and processes required by the iGT UNC) was one reason why they could not support iGT050. Although we are strongly supportive of iGT039 and have a significant level of expectation that it will be implemented, at this point in time this is not guaranteed and if implemented is not expected to go live until 2015 at the earliest. For this reason, along with the fact that by this time the roll out of Smart Metering will have gathered steam it is important that robust automated processes are in place. Therefore we do not feel that it is appropriate,

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as the Proposer suggests, that “Whilst parties may wish to automate the processing of the files within iGT050A, they could be processed on a manual basis, as is currently the practice within GTC”. The manual creation and processing of files is both costly and inefficient, it provides increased opportunity for human error and could potentially affect the accuracy of data held within Pipeline Operator systems.

If as expected iGT039 Single Service Provider goes live in 2015 the implementation of the files suggested under this Modification Proposal would become obsolete, this will result in a requirement for Pipeline Users to introduce existing industry flows recommended under iGT050. In this scenario Pipeline Users will unnecessarily incur two sets of development costs which will ultimately be reflected in Customer bills.

For the above reasons we are not in favour of this Modification Proposal and would like it noted that a joint iGT and Shipper Workgroup worked together over a period of 18 months to develop an agreed solution to this issue, the output of which can be found under iGT050 and the associated ‘iGT-Shipper Operational Metering Communications Document’.

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