

Consultation Response

iGT079s: Adding Commercial New Connections Framework Ancillary Document

Responses invited by: 08/03/2016

Respondent Details

Name: Cher Harris

Organisation: Indigo Pipelines

Do Not Support Implementation

Please briefly summarise the key reason(s) for your support / opposition

It is our view that this proposal is not an improvement on the existing process and will in fact complicate the process making it more prone to error and confusion.

There is already an industry wide process for the registration of new and existing non-domestic Supply Points. This process is Shipper initiated and uses standard forms that are already in IGT UNC governance. The Shipper is in control of which MPRNs they register and when. They also control the provision and installation of a meter.

The existing domestic PSR is the transportation contract between the Shipper and IGT and acts as a bulk registration agreement. Introducing a non-domestic PSR, initiated by the IGT, early in the process will, in our opinion, not add any benefit and could actually create more confusion. This is because the Developer does not generally arrange a Supply contract on new commercial premises, they wait until the property is occupied and the occupier then makes their own arrangements for Supply and provision of a meter. This can often be months after the service was installed as commercial properties often sit empty.

The MPRN is generated early in the non-domestic new connection process and given to the developer, to pass onto the eventual occupier. When the occupier contacts their preferred Supplier, the Supplier's Shipper will send a Nomination Request to the IGT to obtain the relevant Supply Point details, to enable them to quote for Supply. If the quote is accepted, the Shipper will then send a Confirmation Request to the IGT to register themselves as the responsible party.

The IGT's relationship is with the Developer, not the occupier, and therefore the IGT is unlikely to know who the eventual occupier intends to contract with for their gas supply. As such, they will not be able to issue a PSR as the Shipper/Supplier will be unknown.

The proposed legal text allows for the PSR process to be initiated by either the Developer identifying the Supplier to the IGT or the Shipper identifying themselves to the IGT. The Shipper would do this by initiating the Supply Point Confirmation Process. Issuing a PSR at this stage, alongside the Confirmation Response file, will add nothing to the process as the Shipper & Supplier will already be aware of the site and the Confirmation acceptance acts as the contract between Shipper and IGT. Issuing a second contract for Shipper responsibility (the PSR) could create Legal complications.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

Agree that this is a self governance modification

Please state any new or additional issues that you believe should be considered

The IGT will not be able to populate many of the most important data items as they are at the discretion of the Shipper – e.g. MAM, GAO, Meter Mechanism. The IGT could only send these as Null or Unknown.

In addition, as non-domestic plots are registered individually, there would never be a requirement to send a revised PSR due to a revision in the number of plots.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

This proposal does not support any of the relevant objectives. It introduces extra complexity into the existing process by creation of a new, large data flow. The IGT will not be able to send the file until the Shipper identifies themselves via the existing Confirmation process and therefore the suggestion that the new connections process will be improved by the earlier flow of data between IGT and Shipper is incorrect. Furthermore, by effectively issuing two different transportation contracts between IGT and Shipper (the PSR and the Confirmation Acceptance) could lead to legal complications.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

A detailed cost breakdown has not yet been obtained from our IT service provider but would be fairly significant as it requires a complete redesign of the non-domestic new connection process in our database. As New connections work is critical to our business it will need thorough testing.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

This Mod is not in the scope of Project Nexus/SSP and is not reliant on the implementation of Project Nexus/SSP, therefore its implementation cannot be linked to Project Nexus/SSP implementation.

This Mod requires us to make changes to a critical business process, it will therefore require careful development and thorough testing. As such, we require 6-9 months implementation lead time. However, all our development resource is currently fully occupied on Project Nexus/SSP & RGMA implementation, and we do not feel it would be appropriate to divert this resource away from Nexus/SSP & RGMA, therefore we would be looking to implement 6-9 months AFTER SSP Implementation on 01/10/16 (i.e. Q2 2017).

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

Yes

Further Comments

Is there anything further you wish to be taken into account?

Responses should be submitted by email to IGTUNC@gemserv.com