

**Consultation Response****iGT097:**

Provisions for allowing  
consecutive estimated invoicing  
in the event of System Failure by  
the CDSP

Responses invited by: 13 April 2017

**Respondent Details**

Name: Amie Charalambous

Organisation: npower

Support Implementation ☐

Qualified Support ☐

Neutral ☐

Do Not Support ☒

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

### We have some concerns and questions we would like clarification on

How often are these system failures likely to occur?

What evidence is there to support the possibility of a system failure?

How long are these system failures likely to last?

What is the current billing protocol / what has been done in the past, when system failures have spanned consecutive billing periods?

- Are invoices still issued or 'held back'?

What type of invoices are likely to be affected by system failures?

Are estimated invoices ever reconciled once failures are resolved and the PO regains the ability to issue invoices based on actual charges?

- Or is it agreed between parties, that estimated invoices are paid without any difference in charges ever being recouped or reimbursed?

Are there any guidelines around the length of time consecutive estimated invoices can continue to be issued, and therefore the length of time a shipper continues to receive estimated invoices?

We understand the why this Mod would provide billing assurance for the PO, we would like to understand if the shipper's request to receive invoices based on actual charges is affected?

When invoices are issued, is there a means of determining whether an invoice is estimated or actual?

- Without the need of permission from the 'User', how would an estimated invoice / continued issuing of estimated invoices, be recognised?

In the instance of estimated invoices being issued, how would PO invoice data held within PO systems, be reconciled to CDSP systems once the failures were resolved, in order for data to be consistent/uniform in both systems?

## 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?

No

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

-

## Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Insert text here

## Impacts and Costs

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

## Implementation

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

6 months,

## 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?

No

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**