

Consultation Response**iGT097: Provision for allowing consecutive estimated invoicing in the event of System Failure by the CDSP**

Responses invited by: 13 Apr 2017

Respondent Details

Name: Kirsty Dudley

Organisation: E.ON UK

Support Implementation ☐

Qualified Support ☐

Neutral ☐

Do Not Support ☒

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

We do not support the principles of this modification because the provision of the data via the CDSP and contingency invoice process is focussed around the ability to invoice e.g. an invoice cannot be raised due to a System Failure rather than data errors.

Our belief is the iGTs would still be able to invoice in the event of any CDSP data problems as the iGTs can still create a physical invoice (albeit manually). The evoking of the contingency procedure should be because iGTs cannot invoice; not because of any missing/incorrect data. We believe this section has been misinterpreted to cover the data rather than the invoice.

A contingency invoice could be based on the iGTs last portfolio view e.g. the snapshot at the commencing of the non-effective days, if the issue happened directly after Nexus implementation (noting the first Nexus impacted billing run is PNID+1 month not PNID). The invoice could be withdrawn and re-issued once the up to date information is received. There is already a code provision to allow invoice corrections so we do not believe these changes add any value or create the suggested safeguards.

We are concerned, if approved, the amendments may impact the smaller Shippers who may not have the cashflow to cover an incorrectly estimated contingency invoice; we do not feel the same protections are being applied both ways.

In summary, the changes being proposed add no benefit to the text already approved for Project Nexus implementation. In the event a contingency invoice is required - it should be because the iGTs are unable to invoice and not because of data issues with the CDSP; these should be managed with the CDSP not via iGT UNC amendments.

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?

We support the determination and believe it meets the self-governance criteria.

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

NA

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We do not believe it supports Objective A but instead it facilitates Objective F as it would be linked to administration of the code and how contingency invoices are treated in the event they are issued.

Impacts and Costs

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

Minor costs to amend internally processes in the event a contingency invoice is received.

Implementation

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

We do not support the implementation but it could be implemented for PNID if approved.

Legal Text

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

We do not support the implementation but we have no comments on the drafted legal text.

Further Comments

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

NA

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