

**Consultation Response**

**iGT097:** [Provision for allowing consecutive estimated invoicing in the event of System Failure by the CDSP](#)

Responses invited by: 11/04/2017

**Respondent Details**

Name: Cher Harris

Organisation: Indigo Pipelines

Support Implementation      Y

Qualified Support              ☐

Neutral                            ☐

Do Not Support                 ☐

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

Support – this is a pragmatic approach to mitigate potential risks associated with the bedding in of CDSP arrangements.

## 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?**

**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?**

Supports Objective A

## Impacts and Costs

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

Mitigates against financial risks faced by Pipeline Operators if CDSP fails to provide billing data.

## Implementation

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

Needs to be implemented 01/06/17 in line with Project Nexus/SSP

## 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)