

Consultation Response

iGT097: Provisions for allowing consecutive estimated invoicing in the event of System Failure by the CDSP.

Responses invited by: 13 04 2017

Respondent Details

Name: Kishan Nundloll

Organisation: ESPUG

Support Implementation X

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

ESPUG agrees with the intent of the modification that the modification is being raised as a backstop. Currently, the iGT UNC provides that in the event of an iGT system failure, the iGT is allowed to submit an estimated invoice to Shippers'. ESPUG believes if the system failure extends across more than one billing period, then the iGT is not able to submit consecutive estimated invoices without the Shippers' consent.

IGT097 proposes to remove this requirement for the Shippers' consent to consecutive estimated invoices in the specific event of a system failure of the CDSP.

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?

ESPUG agrees with this modification being granted urgent status and the timetable suggested.

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

ESPUG believes that the issue of prolonged System Failure (CDSP or third party) that spans more than a single billing period or multiple separate System Failures that occur in line with consecutive billing periods, then iGTs will be unable to create and submit estimated invoices for the consecutive billing period after the initial estimated invoice was submitted, without the User's permission.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

ESPUG fully agrees that this modification better facilitates relevant objective (A), efficient and economic operation of the pipe-line system. Both iGTs and Shippers' will have clear guidance and clarity on this specific scenario based on this modification.

Impacts and Costs

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

No costs would be occurred on this modification being implemented.

Implementation

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

This should be in line with PNID.

Legal Text

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

ESPUG is satisfied that the suggested legal text will deliver the intent of the modification.

Further Comments

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

ESPUG believe that the letter issued by the Authority which states the below is worth noting.

In coming to our decision we have assessed the request for urgency against our published guidance. We have considered in particular whether it is linked to “an imminent issue or current issue that if not urgently addressed may cause a significant commercial impact on parties”.

We acknowledge that the implementation of the CDSP arrangements and in particular the implementation of new IT systems on 1 June 2017 represent a significant change to both Shippers and IGT operations. All parties have been engaged in thorough testing as part of Project Nexus, which completed to a sufficiently satisfactory level for the programme to substantively exit the Market Trials regression-testing phase on 24 March 2017. Therefore, whilst we have no reason at this stage to believe that the CDSP will encounter any problems in issuing invoices on behalf of IGTs, we acknowledge that parties have some residual concerns and that this area.

ESPUG is currently engaged in all relevant forums and is committed to ensuring that PNID is achieved. ESPUG rely solely on the IDL to provide us with an accurate view of our Supply Point Register. This is provided to us daily by our CDSP, and whilst ESPUG have been committed to testing this through Market Trials Core and Regression, multiple defects have led to low confidence in the file. This subsequently required escalation to RIAG and a deep dive session chaired by OFGEM. Questions remain outstanding in regards to a documented catch up process and we believe this modification will circumvent the failed production should it occur post go-live.

This modification is being raised to offer assurance in the unlikely case there is a delay/issue. It should be noted that this modification is being aligned with iGT080 and that current evidence of the handling of the IDL file by the CDSP makes this a reasonable modification in order to mitigate risk.