

PSR/ Bulk Confirmation Overview Paper

Overview

During the development of IGT UNC modifications 078 (Ancillary Document for the New Connections Process) and 079 (Adding Non-domestic New Connections Framework Ancillary Document) it was identified that the Agency systems for Project NEXUS did not fully support the IGT new connections process and consequently was not fully compatible with the IGT039 drafting within the IGT UNC. Both IGT 078 and 079 have developed revised Bulk Confirmation ("PSR") formats via new ancillary documents which are to be implemented in February 2017 but do not amend the contractual framework in which the Bulk Confirmation process operates.

Issue

Currently Agency services are due to be implemented under Project NEXUS in October 2016. The issue has been identified under IGT078 and 079 discussion that the current IGT UNC drafting for bulk confirmations under Part C1 Paragraph 13 (which remains unchanged under IGT039), is incompatible with NEXUS systems build. This identified issue is that the Agency system can allow the first registered Shipper on the Agency system at a supply point level to be different to that confirmed via the Bulk Confirmation process between a Shipper and IGT. The Agency has confirmed that their systems cannot be changed in time for NEXUS implementation to support the current IGT new connections process.

Solution

The IGT039 legal text will need to be reviewed in light of the loophole identified with the Agency system and a solution developed in time for Project NEXUS go live that does not obligate a Shipper to undertake actions where they are not the registered Shipper on the Agency system.

Once the necessary change to the iGT039 text has been agreed the text for IGT078 and 079 may also need to be reviewed separately on the basis that the "base text" on which the drafting has been constructed (iGT039) will (subject to approval) change. The iGT039 change will probably have to be made via a modification although if changes are required to the iGT078 and/or iGT079 text it is the Code Administrator's view that these could be made via a FastTrack modification.

A change could in the future be raised to amend the Agency system to change the validation requirements for the initial registration of supply points on their system. This would however be a separate piece of work at a later date as the Agency have confirmed that systems rules cannot be changes ahead of Project NEXUS go live.

Changes are therefore required to:

- 1) Recognise that the initial Shipper registered on the Agency Shipper may differ to the Shipper registered via the Bulk Confirmation Process;
- 2) Cater for such situation; *and to acknowledge the Agency system in this process;*
- 3) Require the IGT to send the information to the IGT Agency from the Bulk Confirmation Process; and
- 4) Subject to point 1, require the Shipper to register the supply point on the IGT Agency system.