iGT UNC - Standards of Service

Post Implementation Review Proposal

Author:	Colette Baldwin	Printed:	11/11/2009
Document Ref:	iGTUNC001 PIR	Version:	1.0
File Location:	iGT UNC Modifications		

Contents

1. Background

iGT UNC 001 was implemented in November 2008 to improve the management of iGT queries raised by Shippers. Prior to the implementation of this modification, the industry was faced with a fragmented approach which increased the costs of administration of iGT queries and also did not give any degree of certainty to the time it would take to resolve a query.

The modification introduced a suite of standard query types, a query template, and procedures for submission, receipt, acknowledgement and resolution of queries. It also introduced a suggested performance standard framework, escalation procedures and reporting structure.

2. Current Situation

It is now twelve months since the new regime went live and we have seen some variations in the delivery of this modification from that which was originally conceived. All iGTs are complying with the requirements to manage queries submitted to them, however, we are seeing interpretation and variations creeping into the regime – for example, some parties have opted for a web-based service for query submission which is technically beyond the requirements of the modification, and there have been some interpretation issues with regard to the definition of "bulk queries" and "projects" and some uncertainty in the reporting requirements, and indeed the delivery of those reports. E.ON therefore decided to conduct an internal post-implementation review of the regime.

3. E.ON's Internal Review

As we approached the 1 year mark, we carried out a review of the query management process within our business.

We contacted all operational areas and asked for their feedback on:

- the volume of queries raised;
- good and bad experiences;
- rejection reasons and levels;
- the resolution timescales against the performance standards as outlined in the guidance document;
- the quality of the iGT reporting;
- suggested improvements;

4. E.ON's Conclusions

4.1. Website

Some of the iGTs are insisting on the use of their website for query submission and management, however since not all of our operational staff have access to the internet this presents problems with staff being unable

to access the website to raise and monitor queries. Whilst we accept that those iGTs may determine that this is the desirable route to raising a query with their business, the current requirements of the regime is that queries are emailed, however if a method other than email is to be used, the modification stipulated that this should be by agreement of the parties not unilaterally imposed by one party.

When requesting further information from the shipper, one iGT is putting this information onto the website and then we are only aware when we receive a prompt that the query is about to be "auto-closed" due to lack of a response from us, that any additional information has been requested.

Sites not yet live on some Pipeline Operator's systems are outside the web-based query system and so there is no ability to raise a query with the iGT for those sites. Where we believe the site is metered (based on the information from our field team or the customer) and we have information that the iGT needs to update we are unable to raise an asset query.

4.2. Bulk and Project Query submission

There appears to have been a lack of clarity around what constitutes a bulk query and whether a query should be a bulk query or a project. We have resolved the instance where we had difficulty with the specific iGT, however, we believe there could be clarity added to definitions in the guidance document.

4.3. Reports

Not all iGTs are providing reports in either the correct format or when they fall due.

4.4. Query Submission Issues

Not all iGTs provide handshakes in all instances.

Some iGTs call to clarify information before accepting or rejecting a query, however, if we call to ask for some assistance in preparation for raising the query – assistance is refused.

We are seeing the inconsistent application of the query reference number provided by the Shipper in follow up emails/contact from Pipeline Operators.

It would be useful to be able to manage our customer's expectations with regard to the timescales taken to resolve the query. When we see queries of one type being generally resolved inside the 4 day window, and then see the same query type submitted in the same manner to the same iGT explicably take the full 40 days to resolve it makes it difficult to apply some general principles on follow up. Some customers feel it is unreasonable when we advise them that it make take up to 8 weeks to get their query resolved and we can't give any better information based on current performance. Sometimes we are getting a query on a customer read resolved in one or two days, other times it can take weeks with no offer of an explanation to assist in placating the customer.

When we receive requests for follow up information – we find this has already been provided in the original query and this results in unnecessary delays in the query resolution timescales.

4.5. Query Closure

When the Queries are being returned to us as closed, data is not being updated in an adequate timeframe. When we dispute the determination of "No Further Action Required" and attempt to escalate the matter we are being turned away. We still have an open issue with the customer that we have to manage.

The quality of responses to queries isn't consistent and is often very person-dependent.

4.6. Escalation

Not all iGTs are providing an escalation point, or that escalation contact is not sufficiently available or contactable so as to make them effective in managing an escalating problem.

4.7. Contact Information

Access to contact information has been difficult to get. When we do get contact information for someone looking at specific types of queries, when they leave there seems to be no handover of work in progress and queries seem to be abandoned.

4.8. Site Visits

When the iGT is arranging a site visit we are not being informed, nor do we have no information from the iGT around the timescales for the site visit results becoming available. This does not help us manage the expectations of our customer who raised the query with us.

4.9. What works well?

The use of a set of mandatory information requirements has improved the user's ability to raise a query and get it accepted by the iGT.

When we ask for an update on a query, it seems that it's easier now for the iGT to track down our query and provide an update.

Improved response rates to initial query submissions.

4.10. What's not working so well?

Complex queries seem to get pushed to the outside limits of the timescales without any progress reports back to enable us to keep the customer informed.

Reporting is inconsistent or non-existent.

Reporting is inaccurate – some iGTs are providing Nil Returns when we have evidence of queries submitted, responded to and closed during the period.

Reporting is not in the correct format.

The introduction of other query codes not defined in the document or the requirement placed on us to use other files/processes to submit the data and so taking queries outside of the scope of the query management process.

Transparency on rejection activity.

5. Recommendations

E.ON would like to recommend that a workgroup is established in the first quarter of 2010 to review the operation of the query management processes, to undertake a review of the guidance document and file formats, to identify if:

- Changes are required to either the document or file format,
- improvements can be made to any of the processes, and
- To consider if the Performance Standards framework is fit for purpose.