iGT039: Use of a Single Gas Transporter Agency for the common services and systems and processes required by the IGT UNC

Responses invited by: 21st January 2015

Respondent Details
Name: Kiran Samra
Organisation: RWE npower

Support Implementation

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

RWE npower are in support of Single Service Provision as it will ensure consistency between IGT’s and GT’s regarding the management of data across the network. npower understands that it may be necessary to introduce additional licence conditions on IGT’s to support the introduction of a new IT platform that is being proposed.

Single Service Provision will implement a more efficient platform for the management of MPRN’s across the GB retail gas market. This will be beneficial to the end Consumer, by accommodating all processes for the customer journey within one common set of guidelines. It will also allow for a cost reflective approach that will be more transparent than the current method. Shippers currently incur significant costs managing MPRN’s for IGT sites and the introduction of Single Service Provision will remove a large proportion of these.
### Self-Governance Statement
Do you agree with the Modification Panel’s determination that this should be a self-governance modification?

This modification does not meet the self-governance criteria.

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

Now that UNC467 (Project Nexus - iGT Single service Provision; data preparation) has been approved for implementation it will act as an enabler for Single Service Provision. The approval of IGT070 (Removal of redundant Ancillary documents following the implementation of Single Service Provision), IGT071 (Updating the iGT AQ Review Procedures Ancillary Document), IGT072 (iGT Single Service Provision, noneffective Days for cutover) and IGT073 (Consequential Changes to the 'Pipeline Operator Standards of Service Query Management' Ancillary Document) also act as an enabler for the successful implementation of this mod. However the changes to individual network codes are to be expected and shouldn’t restrict the implementation of this mod.

### Relevant Objectives
How would implementation of this modification impact the relevant objectives?

This modification would have a positive impact on objectives A, B, C, D and F.

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

Npower understands that the iGT’s wish to be revenue neutral but consider any issues that arise from the cost of this mod to be considered as part of the price controls set by Ofgem and subject to their agreement. Costs to Pipeline Users are still unclear but should not be prohibitive and we support the benefits that SSP will bring.

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

This modification should be implemented at the Project Nexus Go Live date to coincide with changes being applied to the UNC under Nexus Mods 432, 434 and Mods 440.
Legal Text
Are you satisfied that the legal text will deliver the intent of the modification?

The legal text has been through a full redrafting and is based on v8.3 of the IGT UNC and the references to the UNC have been based on the UNC0440 modification drafting. It has also been through an external legal review and has been reviewed by the workgroup, as such the final version submitted is one that npower now approve.

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

Following the roll out of UK Link Replacement, the addition step of introducing a Performance Assurance Framework will monitor the critical activities of Suppliers and Shippers. This will provide a greater level of confidence and transparency within the gas billing and settlement arrangements.

Funding should be met through agreement with iGts and Ofgem. Shipper costs are still not known but the guideline costs provided by Xoserve are acceptable. We firmly believe that the benefits that Nexus will deliver to the gas market as a whole will be justified.

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