

Consultation Response

Igt102: Enduring solution for provisions that allow consecutive estimated invoicing in the event of System Failure by the CDSP

Responses invited by: 06/12/2017

Respondent Details

Name: Rob Johnson

Organisation: ESP Utilities Group

Support Implementation X

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

ESP Utilities Group (ESP) supports the implementation of this modification as a necessary backstop process.

This change mitigates the risk of losing the ability to produce estimated invoices after February 2018 (after which Pipeline Operators will be unable to submit consecutive estimated invoices).

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?

ESP agrees that this Modification does not meet the criteria for Urgent, Self-Governance or Fast Track status.

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

ESP has no additional comments beyond those raised during the Workgroup stage (which ESP is satisfied have been addressed within the Modification Report).

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

ESP agrees that extending the ability to produce estimated invoices in the case of system failure will prevent potential cash flow issues for Pipeline Operators and therefore improve the efficient and economic operation of the pipe-line system (Objective A).

ESP agrees that efficiency in the implementation and administration of the Code will be improved by the certainty created in replacing the measures set in place by IGT097 and by ensuring the continuity of a clearer estimated invoice process (Objective F).

Impacts and Costs

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

None.

Implementation

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

ESP agrees with the proposer that Implementation is achievable for 1st February.

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?

ESP has no additional comments.

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