

## Consultation Response

# IGT113VV: Amendments to the CSEP NExA Table Ancillary Document and associated templates

Responses invited by: 10 Oct 2018

## Respondent Details

Name: Kirsty Dudley

Organisation: E.ON

Support Implementation ☐

Qualified Support ☒

Neutral ☐

Do Not Support ☐

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

Although we support the principles this is trying to achieve and the consistent use of codes between IGTs we have identified that two additional codes are currently being used by 1 IGT which are not part of the values being proposed. These are: INF – Infill and DCV – Detached Caravan.

Although the use of INF is being addressed through the rules of the RPC invoice data production (like COM – Commercial) the DCV value has not. Discussions with this IGT sees them happy to move the information into 1BP this is not part of the modification but we are happy this can be delivered at the same time.

We are concerned that the timings for the process may not work, although we are currently accepting all values, other Shippers may not be the same.

We support the intention and are happy to deliver subject to Panels direction and also subject to approval.

## 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?**

As there is no change to the mapping of the values we do not believe there is any customer impact and therefore we would be happy to treat this change as self-governance.

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

Additional issue covered in the summary.

## Relevant Objectives

**How would implementation of this modification impact the relevant objectives?**

We support the workgroups recommendation on the objectives.

## Impacts and Costs

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

We are not currently rejecting the values and some IGTs are already using those proposed, so we anticipate only low costs to deliver this and to ensure validation meets only the allowable values proposed.

## Implementation

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

We recognise this as a two-phased implementation

- 1) The use of the NExA values by the IGTs so they can capture the data ahead of the report production next year
- 2) The Shipper receipt of the new report and values next year including the proposed values which the Shippers are to then recognise

We do not want to preclude Shippers from receiving these values in line with the data production of the IGTs, but, we do not see that are formal enforceable values until after the 2019 NExA table review so for Shippers it would be a 2020 implementation rather than 2019 for the IGTs.

**Legal Text**

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

No comments

**Further Comments**

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

No comments

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**