

Final Modification Report	At what stage is this document in the process?
<h1>IGT112V:</h1> <h2>Refinements to the RPC Template</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;"> 01 Modification </div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>This modification is seeking to refine the RPC template to add clarity and ensure it remains up to date and robust.</p>	
	<p>Panel consideration is due on 19th December 2018 <i>(delete as appropriate following Panel's decision)</i> The Panel recommends implementation</p>
	<p><i>(delete as appropriate following Panel's decision)</i> The Panel does not recommend implementation</p>
	<p>High Impact: NA</p>
	<p>Medium Impact: NA</p>
	<p>Low Impact: Pipeline Operators, Pipeline Users and CDSP</p>

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Timeline		 020 7090 1044 Proposer: Kirsty Dudley  Kirsty.Dudley@eoneenergy.com  07816 172 645
The Proposer recommends the following timetable:		
Initial consideration by Workgroup	7 th August 2018	
Workgroup Report presented to Panel	21 st November 2018	
Draft Modification Report issued for consultation	22 nd November 2018	
Consultation Close-out for representations	6 th December 2018	
Final Modification Report available for Panel	12 th December 2018	
Modification Panel decision	19 th December 2018	

1 Summary

What

The current RPC template has some ambiguous descriptions which is resulting in Pipeline Operators interpreting, and therefore completing fields differently. This modification is seeking to address these issues by adding clarity to the RPC Invoice Template Document.

Why

The purpose of the RPC Invoice Template Document is to ensure a common approach to invoice backing data production is followed, the ambiguous business rules has resulted in multiple approaches being followed and manual work arounds being deployed by our finance team.

How

To ensure a consistent and robust approach to invoice backing data production is taken, additional clarity and business rules are to be added to the RPC invoice Template Document.

2 Governance

Justification for Self-Governance Procedures

The amendment of the RPC Invoice Template Document does not have any material impact on the future of gas customers, competition in shipping or safety of the network. The amendments are of a governance nature so should be progressed as Self-Governance.

Requested Next Steps

This modification should:

- be subject to self-governance
- be assessed by a Workgroup

Work Group Comments

The Workgroup agreed with the Proposers view that this Modification should be Self-Governance. The Workgroup did not believe there would be impacts on the CDSP.

3 Why Change?

The RPC Invoice Template document was created in 2013 and was refined in 2017 by IGT076S to ensure it aligned with IGT039 and the implementation of Project Nexus. Our recent review of the ancillary document and data received has identified that not all IGTs align in how they format the backing data for the header, footer or even the body of the information.

To ensure the process remains up to date, consistent and robust this modification has been submitted to refine and define the business rules to give clarity on the exact requirements.

We have identified the following high-level issues (although not limited to this list) which through development would improve the process and seek to reduce manual Pipeline User intervention in invoice loading and validation:

- Currently, ambiguously drafted header and footer information – amendments required to provide clarity and consistency;
- Although the format is for RPC supplies B10/B11 data which relates to legacy supplies can also be incorporated, there are currently no business rules relating to this so it would be beneficial to existing and new parties to add something, even if only limited;
- Some data received breaches the length specified in the RPC template but aligns with the UK Link CIC file, it is recommended the review also aligns data requirements with field names within UK Link requirements for consistency;
- There are no clear business rules for population of adjustment rows which would be beneficial for Pipeline Users to help with charge validation assisting Pipeline Operators with clearer business rules for data production and Pipeline Users for data validation; and
- There are 'conditional' fields but the descriptions do not contain information on the actual condition, adding this adds further clarity for production and validation.

The formal approach to query invoices is via the SOS Query process (ancillary document), however, not many (if any) Pipeline Users are using this process. Instead emails to invoice contacts are being sent to query ambiguous or differently interpreted data. Although it is difficult to quantify, it is perceived that additional clarity in the RPC template will result in a reduction in the number of queries relating to formatting.

4 Code Specific Matters

Technical Skillsets

Knowledge of RPC invoicing

Reference Documents

RPC Invoice Backing Data ancillary document

5 Solution

To address the ambiguity in the file format the proposed refinements to the current RPC Invoice Template Document are:

- Aligning the formatting to the Project Summary Reports (PSR) and UK Link files to give a common approach across codes;
- Moving the formatting guidance from the last page to notes on the overview page;
- Updating C-Character to T-Text to align with UK Link (currently only used in the header);
- Adding overview notes relating to legacy charges (B10/B11), query management and operational invoice contacts into the overview;
- Including notes relating to double quotes into the document (standard for .CSV files);

- Removal of the green RPC Template grid and merging the information into the file format (mirroring UK Link) and merging the data item names into the field number column – some names suggested may differ to current naming;
- Creation of a header information section;
- Creation of a footer information section;
- Giving the MPRN level data the heading of Record Type Definition;
- Adding in actual conditions for C-Conditional so it is clear the conditions to follow;
- Renaming column headings to align to UK Link e.g.
 - FIELD_NAME
 - OPT for Mandatory/Conditional/Optional (M - Mandatory, C - Conditional O - Optional)
 - DOM for Domain (T - text, N - Numeric, D - Date (DD/MM/YYYY))
 - LNG for Number of characters
 - DEC for Number of decimal places
 - DESCRIPTION
- Adding clarity for adjustment records populated;
- Updating Meter Type to Meter Mechanism – which checking SPAA MDD the meter type = e.g. rotary, however, the RPC template is actually seeking to show the Meter Mechanism (A0086) – this solution seeks to align the requirements using an already approved data item rather than free text options in the RPC template; and
- Standard demonstration of the totals.

The intention of this modification is to deliver refinements and clarifications via wording changes rather than system changes, however, it is recognised that for some Pipeline Operators and Pipeline Users the refinements may result in IT refinements to deliver the consistent approach.

To support this modification an initial draft of the RPC template changes (including commentary) has been submitted with this proposal.

Work Group Comments

The Workgroup discussed the solution and agreed that this reflected the changes made to the Ancillary document during the Technical Subgroup discussions. Whilst the modifications solution was not specific with regards to the CSV file formats, the Workgroup resolved that this should be the standard going forward.

6 Impacts & Other Considerations

Depending on Pipeline User and Pipeline Operator system builds there may be an impact to systems to align with any solution approved. This change is seeing to make as many clarificatory updates via descriptions rather than via IT changes, although some IT changes maybe required.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No – this is evolving the RPC template and doesn't impact the SCR.

Consumer Impacts

None expected as this relates to transportation invoicing

Environmental Impacts

None expected as this relates to transportation invoicing

Work Group Comments

The Workgroup agreed with the Proposers view on Impacts.

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	None
(B) Co-ordinated, efficient and economic operation of (i) the combined pipe-line system; and/or (ii) the pipe-line system of one or more other relevant gas transporters	None
(C) Efficient discharge of the licensee's obligations	None
(D) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers	None
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	Positive
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

This modification will deliver Objective F as it will incorporate efficient and effective edits to the RPC template which will ensure that the process remains consistent and robust using, also utilising common language between the SPAA and the CDSP file formats for UK Link.

Work Group Comments

The Workgroup agreed that the modification would have a positive impact on Relevant Objective F) Promotion of efficiency in the administration of the Code.

8 Implementation

As soon as reasonably practicable, aiming for the June 2019 release (to allow 6 months for parties who may require system changes).

Work Group Comments

The Workgroup supports the Proposers view on implementation in June 2019.

9 Legal Text

PART G - PIPELINE TRANSPORTATION CHARGES, INVOICING, PAYMENT AND CODE CREDIT

3 Invoicing

3.1 The amounts payable by Pipeline Users to the Pipeline Operator and by the Pipeline Operator to Pipeline Users in accordance with the Code will be invoiced and payable in accordance with this Part G.

3.2 The Pipeline Operator will submit to each Pipeline User Invoice Documents in respect of each Billing Period in accordance with this Part G. For **RPC IGT Transportation Charges** Invoices the Pipeline Operators will use the **RPC IGT Transportation Invoice Charges** Template.

3.3 For the purposes of this Part G:

- (a) subject to Clause 3.4, a **"Billing Period"** is a calendar month;
- (b) a **"Billing Day"** is a Day in a Billing Period;
- (c) an **"Invoice Document"** is an invoice document submitted by the Pipeline Operator to a Pipeline User pursuant to this Part G;
- (d) an **"Invoice Item"** is an item (in respect of all charges of a particular kind) shown as payable by the Pipeline Operator or by a Pipeline User in an Invoice Document;
- (e) the "Invoice Amount" in relation to an Invoice Item is the amount shown as payable by the Pipeline User or the Pipeline Operator in respect of that item under the relevant Invoice Document.
- (f) an **"RPC IGT Transportation Charges Invoice"** is an invoice submitted by the Pipeline Operator to a Pipeline User pursuant to this Part G.
- (g) the **"RPC IGT Transportation Invoice Charges Template"** is the IGT UNC Ancillary Document **'RPC IGT Transportation Invoice Charges Template'**.

Appendix G-1 RPC Invoice Template

This appendix was removed during the implementation of IGT UNC v7.2 (28th June 2013). **For information the Template is now held within the IGT UNC Ancillary Document 'IGT Transportation Invoice Charges Template'.**

Part K

APPENDIX K-2 IGT UNC Ancillary Documents

Pipeline Operator Standards of Service Query Management

Password Protection Protocols

IGT CSEP NExA Table Review Procedures

~~RPC Invoice Template~~

IGT Transportation Invoice Charges Template

CSEP NExA Tables

IGT's New Connections Domestic Sites Only

IGT Non-Domestic New Connections

Part M

~~“RPC Invoice” shall have the meaning in Part G3.3(f)~~

“IGT Transportation Charges Invoice” shall have the meaning in Part G3.3(f)

RPC Invoice Template Ancillary Document (Version 1.3)

Change its name to:

IGT Transportation Invoice Charges Template

Work Group Comments

The Workgroup agreed that the legal text supported the intention of the solution.

10 Consultation

Panel invited representations from interested parties until 6th December 2018 and agreed a shortened consultation window of 10 days in order for this report to be sent to the December Panel. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Representations were received from the following parties:			
Organisation	Response	Relevant Objectives	Key Points
E.ON	Support	F - positive	<ul style="list-style-type: none"> We support all suggested refinements within IGT112V as it will deliver consistent formatting across IGTs which doesn't currently exist for all data items within the invoice supporting data. We appreciate that some IGTs will be impacted more than others, but Shipper processing shouldn't need to have separate processing activities for the RPC backing data, it should instead be in a format which can be processed the same regardless of which IGT it is issued

			<p>from.</p> <ul style="list-style-type: none"> We do not believe that there are any consumer or competition implications and recommend that self-governance procedures apply, we do not believe Authority approval is required for this modification. The implementation of this modification would have a positive impact because it will allow Shippers to have a single invoice process implemented, without the need for multiple manual workarounds to load and validate the data which the IGTs have issued to support their invoicing. There will be system and manual process changes which will have some costs to develop and implement but they are not anticipated to be greater than small to medium scale, we were unable to conduct a more detailed assessment so can only provide a ROM at this stage. We support a 6-month implementation period and look for this to be delivered in June 2019.
ESPUG	Support	F - positive	<ul style="list-style-type: none"> ESP supports the implementation of this modification because it provides clear guidance for the population of Invoice Backing Data. This in turn will enable Shippers to accurately reconcile their invoices. ESP agrees that this modification is suitable for self-governance. ESP anticipates incurring a cost to incorporate the proposed change however we do not believe this to be significant. As there may be an impact to Pipeline User and Pipeline Operator systems to accommodate the proposed change, ESP believes there should be at least a 6-month lead time to implement the change.
BU-UK	Support	F - positive	<ul style="list-style-type: none"> We support the intent and proposed solution of this change. The Technical Workgroup created to assess and determine the appropriate changes to the RPC Template has worked well and should serve as a suitable platform for similar such changes. With the implementation date providing six

			<p>months for the required system changes, this will provide a suitable amount of time for the minor amendments to be made and ensure effective use of the amended template going forwards.</p> <ul style="list-style-type: none"> • It is agreed that there is no material impact and as such is suitable for Self-Governance procedures. • While there is an impact on IT systems, these are minimal with low costs. The prescribed six months to implement the change will provide enough time to make the necessary amendments. • Following multiple successful Technical Workgroups, we are confident the template meets the requirements for an enduring solution. We are also satisfied with the legal texts change of name to the template which more accurately portrays the purpose and use of the document.
Indigo Pipelines	Neutral	F - positive	<ul style="list-style-type: none"> • We have no objections to this proposal. • Impacts Objective F in so far as it clarifies the formatting of RPC Invoices and removes the current ambiguities. • System changes are required so at least 6 months lead time required to design, develop, test and implement the changes.

In summary:

- Four responses were received to the consultation for IGT112V, incorporating one response from a Pipeline User, three responses from Pipeline Operators.
- Three respondents offered support to this modification, one responder remained Neutral.
- Respondents agreed that the Modifications better facilitated Relevant Objective F) Promotion of efficiency in the implementation and administration of the Code.
- All respondents agreed that the Modifications did meet the criteria for Self-Governance.
- All respondents agreed that the proposed Legal Text supported the requirements of the solution.
- Respondents noted that the best date for implementation would be June 2019 release as a 6-month lead time would need to be preserved for system changes.

11 Panel Discussions

The Code Administrator will provide a summary of the Panel discussions that inform any decisions taken. This will include a record of Panel's views on the representations, the outcome of any votes and, where alternates exist, Panel's preference.

Discussion

Insert text here

Consideration of the Relevant Objectives

Insert text here

Determinations

Insert text here

12 Recommendations

Panel Determination Self-Governance

Members agreed:

- that Modification 112V should [not] be implemented

13 Appendix

[Attachment 1 – RPC Ancillary Document Development Draft](#)