





Modification		At what stage is this document in the process?
<h1>IGT1XX:</h1> <p><i>(Code Administrator to issue reference)</i></p> <h2>Gateway delivery for RPC data</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #28a745; color: white; padding: 5px; border-radius: 5px;">01 Modification</div> <div style="border: 1px solid blue; background-color: #e9ecef; padding: 5px; border-radius: 5px;">02 Workgroup Report</div> <div style="border: 1px solid purple; background-color: #e9ecef; padding: 5px; border-radius: 5px;">03 Draft Modification Report</div> <div style="border: 1px solid orange; background-color: #e9ecef; padding: 5px; border-radius: 5px;">04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>To revise the mechanism of data delivery for the Relative Price Control Data (RPC) backing data from email to gateway delivery.</p>		
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> subject to self-governance assessed by a Workgroup <p>This modification will be presented by the Proposer to the Panel on dd mmm yyyy <i>(Code Administrator to provide date)</i>. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>	
<p>Impacted Parties and Codes</p>		
	<p>High Impact:</p> <p>None</p>	
	<p>Medium Impact:</p> <p>Pipeline Operators / Pipeline Users / CDSP</p>	
	<p>Low Impact:</p> <p>None</p>	

Guidance on The Use of This Template:

Please complete all sections unless specifically marked for the Code Administrator.

Green italic text is provided as guidance and should be removed before submission.

The Code Administrator is available to help and support the drafting of any modifications, including guidance on completion of this template and the wider modification process. Contact: [add email address] or [add telephone number]

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6	Impacts & Other Considerations	5	078161726145
7	Relevant Objectives	6	Other: Gareth Powell
8	Implementation	7	Garth.Powell@eon.c om
9	Legal Text	7	NA
10	Recommendations	8	Other: Insert name
Timetable			email address.
<i>Please provide proposer contacts and an indicative timeline. The Code Administrator will update the contents and provide any additional Specific Code Contacts.</i>			telephone
The Proposer recommends the following timetable: (amend as appropriate)			Other: Insert name
Initial consideration by Workgroup	dd month year		email address.
Amended Modification considered by Workgroup	dd month year		telephone
Workgroup Report presented to Panel	dd month year		Other: Insert name
Draft Modification Report issued for consultation	dd month year		email address.
Consultation Close-out for representations	dd month year		telephone
Variation Request presented to Panel	dd month year		Other: Insert name
Final Modification Report available for Panel	dd month year		email address.
Modification Panel decision	dd month year		telephone

1 Summary

What

Currently the Relative Price Control (RPC) invoice backing data is issued using the IGT Transportation Charges Invoice Template Document which outlines the file format to be provided. This is then encrypted using the IGT Password Protection Protocols document and emailed over to Shippers. Our proposal is to move these files to a gateway delivery rather than via email.

Why

The current process is completed differently by IGTs with some utilising a bespoke portal and others emailing using the correct formatting and protection protocols, with others not. This brings inconsistent operational processes for Shippers which would benefit from being harmonised. Additionally the password protection and delivery mechanisms have been reviewed and are not to be as secure as an encrypted gateway and would also benefit from being moved to a more secure delivery mechanism.

How

To create a gateway delivery mechanism via the Information Exchange (IX) to act as the postman to send the backing data files between the IGTs and the Shipper.

The use of the IX would be in its capacity of a delivery mechanism and would not seek to introduce any validation rules or data checks, that would remain the responsibility of the IGTs. It would align the delivery mechanism between the IGTs and DNs but would still be a unique process for the IGT UNC.

2 Governance

Justification for Self-Governance Procedures

The creation of a technical gateway delivery mechanism for backing data files is a technical advancement in processes only, it does not have a material impact on future gas consumers, impact on competition in shipping or the pipeline system. It additionally does not discriminate between classes, so we propose this modification follows Self-Governance procedures.

Requested Next Steps

This modification should:

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

We propose this modification is developed at a workgroup

3 Why Change?

Currently Shippers receive RPC backing data files each month from all IGTs they have accession agreements with. These comma separated value (CSV) files are provided using the format in the IGT Transportation Charges Invoice Template Document. They are issued by email using the processes outlined in the Password Protection Protocols.

The IGTs provide the information in inconsistent mechanisms with some emailing and others using a bespoke portal access and we are raising this proposal to harmonise the delivery approach, but we do not believe that utilising either approach is the most efficient or effective, and doesn't harmonise to the invoices Shipper receive from the Transporters under the UNC which are all issued via the IX.

Further challenges of the current delivery approaches is the time taken by both Shippers and IGTs to apply the passwords to the individual documents, there is the practice of applying them and removing them each month, as well as the maintenance of the passwords themselves.

On average as a Shipper with multiple licences we spend at least a week a month checking completing the following tasks:

- Checking for receipt of all the backing data files and following up with individual IGTs
- Removal of the passwords of the backing data files to then load them into our internal systems

In the current technical world this is a very resource intensive process which is clunky and could benefit from transitioning from a heavily manual process (for both sides) into a more streamlined delivery mechanism. We anticipate that time savings can be made from all parties rather than just being a Shipper saving.

Additionally, the movement towards a secure gateway delivery would (in our view as the proposers) increase security to the data between the parties data delivery.

Overall the benefits would be to harmonise processes, be consistent in delivery mechanism to the UNC and to improve data security for the information passed between parties.

For the avoidance of doubt, this modification is only seeking to deliver the data via the IX, it is not seeking the CDSP to create or validate any of the data, but to act as a delivery mechanism only.

A working example for us is: For 3 shipper MPIDs, we are acceded to 13 IGT MPIDs and received approximately 40 files per month. We have a single FTE spending around 2.5 days per year preparing files for loading. This includes checking all files received, removal of passwords to load into our internal systems.

We expect that each IGT will have their own time commitments (which is likely to vary per IGT) so across Shippers/IGTs we anticipate a substantial time commitment. Our proposal will see an initial time investment but with the improvements in the security, consistency in approach it will be an overall improvement to the RPC file delivery mechanism.

4 Code Specific Matters

Technical Skillsets

Understanding of the RPC billing processes.

Reference Documents

<https://www.igt-unc.co.uk/wp-content/uploads/2020/02/IGT-Transportation-Charges-Invoice-v1.4-Clean.pdf>

<https://www.igt-unc.co.uk/wp-content/uploads/2021/02/Password-Protection-Protocols-v5.pdf>

5 Solution

To deliver this proposal the following steps are required:

1. To mandate the IGTs to cascade the RPC data via the IX
2. To mandate the Shippers to receive the RPC data via the IX
3. To mandate the CDSP to support the IGTs and Shippers by sending the data between parties
4. For the CDSP to complete necessary steps to connect the IGTs and Shippers in a technical capacity (may not be required if all parties already have IX connections)
5. For the creation of the unique file name [RPC] to enable the IX to recognise the file format
6. For the CDSP to read the header of the [RPC] files and distribute to the correct Shipper
7. For each IGT to deliver the RPC backing data via the IX no later than 5pm the 5th business day of each month (same date as today but inclusion of a cut off time)
8. For the Shippers to ingest the files issued by the IGT and delivered by the IX into their internal systems. There is no direction on what Shippers are then to do with the data
9. [In the event the IGTs have system issues or the IX is down, to keep a contingency email approach to email the data]
10. In the event a file is identified as missing or a copy is required and it relates to a post implementation period (T01 CREATION_DATE), it is still to be issued via the IX if is being delivered post the implementation date
- 11.

Insert subheading here

Insert text here

6 Impacts & Other Considerations

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

No impact.

Consumer Impacts

What is the current consumer experience?

No direct customer impacts as this relates to data delivery mechanism only.

What would the new consumer experience be?

The direct customer impact does not change with the introduction of the data via a gateway.

Impact of the change on Consumer Benefit Areas	
Area	Identified Impact

Improved safety and reliability The safety in this instance is the protection of consumer data and reducing the opportunity of incorrect cascading of the information and ensuring industry standard data protection protocols are applied to data dissemination.	Positive
Lower bills than would otherwise be the case Although likely to make process efficiencies across the process it would be a small FTE impact so would not have a link to direct customer invoicing.	None
Reduced environmental damage No identifiable impact or benefit.	None
Improved quality of service No identifiable impact or benefit.	None
Benefits for society as a whole No identifiable impact or benefit.	None

Cross-Code Impacts

No impact to UNC or REC but impacts to the CDSP to support the IX data transfer. Supporting XRN [to be raised].

UNC	<input type="checkbox"/>
REC	<input type="checkbox"/>
Other	<input checked="" type="checkbox"/>
None	<input type="checkbox"/>

Environmental Impacts

No identifiable benefits.

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 provide benefits to Objective F because

- It will provide a consistent method of delivery for the RPC
 - Harmonising sending/receipt to a single mechanism
- It will reduce administrative burdens for both Shippers and IGTs
 - maintaining distribution lists for data issue
 - remove the need for individual email/attachment encryption and instead follow the industry standard approach on the IX
- Post the initial development it will save Shippers time when removing the passwords to enable loading of the data [IGT benefits to be quantified as currently unknown by us as the proposer].

8 Implementation

November 2024 release

9 Legal Text

To be provided by Code Administrator.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Self Governance procedures should apply
- Refer this proposal to a Workgroup for assessment.