





Modification		At what stage is this document in the process?
<h1>IGT173:</h1> <h2>Gateway delivery for RPC backing data</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #008000; color: white; padding: 5px; display: flex; justify-content: space-between; align-items: center;"> 01 Modification </div> <div style="border: 1px solid blue; padding: 5px; display: flex; justify-content: space-between; align-items: center;"> 02 Workgroup Report </div> <div style="border: 1px solid purple; padding: 5px; display: flex; justify-content: space-between; align-items: center;"> 03 Draft Modification Report </div> <div style="border: 1px solid orange; padding: 5px; display: flex; justify-content: space-between; align-items: center;"> 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 via the IX.</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 22 Dec 2023. 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>	

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7	Relevant Objectives	8	Other: Gareth Powell
8	Implementation	9	Garth.Powell@eon.com
9	Legal Text	9	NA
10	Recommendations	9	Other: Insert name
Timetable			email address.
The Proposer recommends the following timetable:			telephone
Initial consideration by Workgroup	09January 2024		Other: Insert name
Amended Modification considered by Workgroup	n/a		email address.
Workgroup Report presented to Panel	23 February 2024		telephone
Draft Modification Report issued for consultation	26 February 2024		Other: Insert name
Consultation Close-out for representations	18 March 2024		email address.
Variation Request presented to Panel	n/a		telephone
Final Modification Report available for Panel (As short notice paper)	20 March 2024		Other: Insert name
Modification Panel decision	22 March 2024		email address.
			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 via the IX rather than via email.

Why

The current process is completed differently by IGTs with some utilising a bespoke portal and others emailing using the current 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 deemed 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) (according to the DSC Agreement) to act as the postman (Communication Type 2) to send the RPC backing data files between the IGTs and the Shipper.

The use of the IX would be in its capacity of a delivery mechanism only (Communication Type 2) 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 which they have accession agreements with. The IGTs provide comma separated value (CSV) files using the format in the IGT Transportation Charges Invoice Template Document. The CSV files are issued by email or via an online portal using the processes outlined in the Password Protection Protocols.

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

Further challenges of the current delivery approaches include the time taken by both Shippers and IGTs to apply the passwords to the individual documents. The practice of applying the passwords and removing them each month, as well as the maintenance of the passwords themselves can equate to days of activity for a single party per year.

On average as a Shipper with multiple licences we spend at least a week a month checking and 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, introduce a consistent in delivery mechanism equivalent 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 RPC backing 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. It will also not change the current approach to invoice payment should there be any delay to the backing data receipt (G4.7). Finally, this also does not apply to the sending of the Portfolio Extract, that remains the same as today.

A working example for us is: For 3 shipper MPIDs, we are acceded to 13 IGT MPIDs and receive 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 and 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 which includes node [creation/configuration] (CDSP to confirm via ROM response).
2. To mandate the Shippers to receive the RPC data via the IX [TBC if new node or configuration or nothing is required for shippers] (CDSP to confirm via ROM response).
3. To mandate the CDSP to support the IGTs and Shippers by sending the data between parties using the Communication Type 2 approach (acting as a post service only). This is to be added to the IX service area of the DSC Agreement (as it is about being the post service rather than the content of the file). The decision on the service line will also need to go to DSC CoMC.
4. For the CDSP to complete necessary steps to connect the IGTs and Shippers in a technical capacity (this is a catch all technical business rule and may not be required if all parties already have IX connections, but it ensures support is in place for new entrants' post implementation).
5. For the creation of the unique file name [RPC] to enable the IX to recognise the file format (CDSP to confirm file name availability via the ROM).
6. For the CDSP to utilise the file name of the [RPC] files and distribute to the correct Shipper. The file requirements will be added into the IGT Transportation Charges Invoice Template as well.
7. For each IGT to send the RPC backing data via the IX no later than 5pm on the 5th business day of each month (same date as today but inclusion of a cut off time).
8. For the Shippers to receive the files issued by the IGT and delivered by the CDSP via the IX into their internal systems/architecture. There is no IGT UNC direction on what Shippers are then to do with the data once received via the IX.
9. Where there are issues with backing data provision the following business rules apply:
 - I. Where the IGT cannot cascade the backing data files to Shipper by the deadline in business rule 7, the IGT is to update the shipper via the contract manager information held by them or the code administrator.
 - II. Where the Shipper has identified they are missing any backing data files they are to contact the IGT using the invoice contact initially and can escalate to the IGT contract manager using the information held by them or the code administrator.

- III. The CDSP provides disaster recovery support for any event where the IX is down, the IGT may choose to take out disaster recovery kits to support getting back online, this is a DSC service and is not expected to be a codified mandated approach, however the CDSP is to support where an IGT has taken out the option.
 - IV. Where the CDSP identifies issues with the IX and cannot receive or cascade [RPC] files between the IGT and the Shipper, the CDSP is to communicate issues to the DSC Contract Managers for those organisations.
 - V. Where the IGT cannot issue the backing data via the IX by the deadline it can instead issue the IX compatible file via email as a contingency to an email address confirmed by the Shipper contract manager or accounts department.
10. In the event a file is identified as missing and a copy is required:
 - I. Files created prior to implementation are to be reissued via email, even if the files are requested post implementation (as the files cannot be moved to an IX compatible format).
 - II. Files created post implementation are to be issued via the IX, unless there are issues which will follow the processes in business rule 9.
 11. The CDSP to have the timing requirement to send files received within day to the dedicated shipper recipients [to be included in the mod as well as the XRN requirements].
 12. If an issue is identified within the backing data (at any time) the IGTs and Shippers will liaise with each other via the contract managers. If a replacement backing data file is required, this has to be agreed between the IGT and the Shipper and the replacement file is to be issued using business rules 10 and 11, using timelines agreed with the IGT and the Shipper.
 13. As part of the implementation process a window of testing will be available [one month before implementation] for test files to be made available to shippers and the CDSP from IGTs who have volunteered to do so – this is not expected to be part of the legal text but a sensible approach as this will be the first IX file using the Communication Type 2 processes.
 14. Post implementation, the IGT Workgroup are to discuss any post implementations and identify any additional issues to those in business rule 9 and decide on any additional resolution steps and if any further modifications are required. This is a code administrator requirement for agenda planning only and not a legal text requirement.

For the avoidance of doubt clarifications:

- these business rules apply per MPID for Shippers and IGTs. Where either IGT or Shipper has multiple MPIDs it applies to all within the parties' portfolio.
- as referenced earlier in this modification; delays or issues with the receipt of backing data, does not change the rules relating to the payment of the invoice document received by a shipper.
- This modification does not introduce any additional processes to update invoice contact information or the contract manager information, this should be a BAU activity, however, we promote IGTs and Shippers contacting the Code Administrator to check and/or update information.

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 5720 was accepted into the DSC process on 10/01/2024.

<https://www.xoserve.com/change/customer-change-register/xrn-5720-gateway-delivery-for-rpc-backing-data-igt173/>

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

As per business rule 13 in the solution, a window of test file exchanging will be established to support implementation as this is the first use of the Communication Type 2 IX set up. This is not normal practice but the workgroup agreed that a voluntary testing window was a sensible approach.

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.