





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; align-items: center; justify-content: center;"> 01 Modification </div> <div style="border: 1px solid blue; padding: 5px; display: flex; align-items: center; justify-content: center;"> 02 Workgroup Report </div> <div style="border: 1px solid purple; padding: 5px; display: flex; align-items: center; justify-content: center;"> 03 Draft Modification Report </div> <div style="border: 1px solid orange; padding: 5px; display: flex; align-items: center; justify-content: 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>	

Contents		?	Any questions?
1	Summary	3	Contact: Code Administrator
2	Governance	3	iGTUNC@Gems erv.com
3	Why Change?	4	02070901044
4	Code Specific Matters	5	Proposer: Kirsty Dudley
5	Solution	5	<a href="mailto:Kirsty.Dudley@eone
nergy.com">Kirsty.Dudley@eone nergy.com
6	Impacts & Other Considerations	6	078161726145
7	Relevant Objectives	7	Other: Gareth Powell
8	Implementation	8	<a href="mailto:Garth.Powell@eon.c
om">Garth.Powell@eon.c om
9	Legal Text	8	NA
10	Recommendations	8	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		
Consultation Close-out for representations	18 March 2024		
Variation Request presented to Panel	n/a		
Final Modification Report available for Panel (As short notice paper)	20 March 2024		
Modification Panel decision	22 March 2024		

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 (category 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 (category 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
2. To mandate the Shippers to receive the RPC data via the IX [TBC if new node is required for shippers]
3. To mandate the CDSP to support the IGTs and Shippers by sending the data between parties using the category 2 approach (acting as a post service only)
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~~ utilise the file name 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 on 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 and a copy is required, then regardless of the original issue date, post implementation it is to be issued via the IX
11. The CDSP to have the timing requirement to send files received within day to the dedicated recipients [to be included in the mod as well as the XRN]
12. If an issue is identified and the full RPC backing data file requires replacement but the invoice total remains the same, then with bilateral agreement between the Shipper and IGT the RPC file can be replaced and reissued within 5WD of the bilateral agreement date
13. If there are issues with any of the individual charge lines and it impacts the overall invoice total, the adjustments are to be completed via the adjustment charge types (B11 / B13) in subsequent backing data files

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.