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Workgroup Report	At what stage is this document in the process?

IGT173:

Gateway delivery for RPC backing data

01	Modification
02	**Workgroup Report**
03	Draft Modification Report
04	Final Modification Report

Purpose of Modification:

To revise the mechanism of data delivery for the Relative Price Control Data (RPC) backing data from email to gateway delivery via the IX.

The Workgroup recommends that this Modification should:

- be subject to Self-Governance
- assessed by a Workgroup

This modification will be presented by the Proposer to the Panel on 22nd March 2024. The Panel will consider the Proposer's recommendation and determine the appropriate route.

High Impact:

None.

Medium Impact:

Pipeline Operators / Pipeline Users / CDSP.

Low Impact:

None.

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Timetable

The Proposer recommends the following timetable:

Initial consideration by Workgroup	09th January 2024
Amended Modification considered by Workgroup	n/a
Workgroup Report presented to Panel	22nd March 2024
Draft Modification Report issued for consultation	22nd March 2024
Consultation Close-out for representations	17th April 2024
Variation Request presented to Panel	n/a
Final Modification Report available for Panel (**Possible short notice paper)**	19th April 2024
Modification Panel decision	26th April 2024

? Any questions?

Contact:
Code Administrator

iGTUNC@gemserv.com

02070901044

Proposer:
Kirsty Dudley

Kirsty.Dudley@eonenergy.com

078161726145

Other:
Gareth Powell

Garth.Powell@eon.com

NA

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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.

Workgroup Discussions (March 2024)

The Workgroup are in agreement with the Proposer that this Modification should be subject to Self-Governance for the reasons provided.

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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.

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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 utilising the processes outlined in the UK Link Manual – UK Link Access Document – UKLAD3 – UK Link Transfer Definition document for Communication Type 2, including, but not limited to node configuration. To support operational delivery requirements have also been added into the IGT Transportation Charges Invoice Template Document (ancillary document).

2. To mandate the Shippers to receive the RPC data via the IX.

3. The CDSP are to ensure they support any new or existing IGTs / Shippers in the sending and receiving of the Communication Type 2 files which is including but not limited to existing governance procedures. E.g. Specific Service Line 17 (SS-SA22-17) - Provision of an IX connection. The CDSP is to also ensure any/all relevant requirements are updated into the relevant UK link documentation to support this process.

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 each CDSP to ensure creation of the unique file name/extension [RPC] in relation with the UK Link requirements and will form part of the file name created by the IGTs, utilising the documented processes as per BR1 (CDSP to confirm file name availability via the ROM).

6. As outlined in the UK Link documentation and for the avoidance of doubt the IGTs and the CDSP are to utilise the file name and UK Link documented processes to ensure files are distributed to the correct Shipper to avoid commercially sensitive data being shared with incorrect parties.

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. For the avoidance of doubt 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.

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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.   Where the CDSP identifies issues with the IX technical support (as outlined in the UK Link document in BR1) and cannot facilitate delivery of [RPC] files between the IGT and the Shipper e.g. catastrophic failure, the CDSP is to communicate information relating to the IX issues to the DSC Contract Managers for those organisations impacted.

IV.   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.

V.   "Where the deadline in business rule 7 is not able to be met, the IGT shall provide the data to the Shipper at the earliest opportunity, in addition to providing daily updates to the Shipper (via the contract manager information held by them or the code administrator) in the event of a delay."

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, /or current methods, 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. 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.

12. 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 (using the UK Link documentation in BR1) 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. The CDSP are to be also available to support during the testing window as it will be the first delivery of the RPC data via this mechanism so parties may require technical support.

13. 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 Market Participant ID (MPID) (also known as short codes) 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

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promote IGTs and Shippers contacting the Code Administrator to check and/or update information.

Additional solution requirements to support the legal drafting.

14. Re-instate the pre IGT132VV (Introduction of IGT Code Credit Rules) implementation definition for System Failure (which was erroneously altered with the implementation of IGT132VV) and add a further System Failure option in respect of the adopted Communication mechanism (Information Exchange (IX)) required in the solution for this modification. Also correct the existing references to the original clause so that they point to the reinstated definition.

Workgroup Discussions (December 2023)

The Proposer confirmed that this Modification excludes any changes to invoice issuing.

The proposal was bringing in a central delivery mechanism via the IX as a simple alternative to email. An IGT asked if the CDSP would get access to the new data which was explained that the current capability would be utilized with a new RPC file type and there would be no access to the content in the files.

A discussion was undertaken on the assurance of timing, and where an assurance would be preferred that late data does not impact any invoice payments. It was explained that a contingency was included where the system can default back to the portal and away from the IX. It was agreed that the IGT invoices functioned as "pay first, dispute later", and that a failure to receive backing data does not constitute grounds for refusing to pay. The Proposer reiterated that the scope of the Modification would only affect the backing data. The portal and email will still be in place for invoicing and metering.

Workgroup Discussions (January 2024)

The Workgroup underwent discussions on the Business Rules within IGT173 v2.0.

It was confirmed that satisfying Business Rule 1 (To mandate the IGTs to cascade the RPC data via the IX which includes node creation) was a node configuration exercise rather than a creation and it was likely that a change would be necessary as IGTs were currently not set up to send messages to Shippers.

An IGT asked if the new node was for each license. The Proposer mentioned that they understood that the license would apply to each individual entity. The Proposer added that they had drafted the Modification to be for each entity at the license level. The Proposer agreed to add this to the Business Rules and to confirm if this was a configuration of nodes on individual Market Participant IDs.

The CDSP confirmed that for Business Rule 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)), IX areas were covered under Service line 22 of the Data Services Contract (DSC) for the CDSP.

A discussion was undertaken in reference to Business Rules 9 (In the event the IGTs have system issues or the IX is down, to keep a contingency email approach to email the data), and whether there were any other cases where the IGT would not be able to send the file. An IGT confirmed that they currently have a problem with Shipper contacts availability as there is no published Contract Manager list. It was added that it served the interests of all parties to improve Contract Manager communication between IGTs and Shippers.

It was mentioned that in Business Rule 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), from a legal drafting perspective, the bilateral agreement was ambiguous. It was queried if the agreement

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was recognised in the IGT UNC. The Proposer responded that even though it was not codified, the agreement does exist. The code administrator queried the enforcement of the five working day rule. An IGT mentioned that it could be reduced to an agreement between the Shipper and the Transporter. It was proposed that this could be monitored throughout the process, and they could come back to this further on in the development of the Modification.

The Proposer queried the Workgroup on pre-implementation testing requirements. An IGT advised that they would want to test if the files could be sent via the IX.

Workgroup Discussions (February 2024)

A question was raised that in the Business Rules, if IX goes down, then the CDSP will notify the relevant parties, but in the legal drafting, this responsibility shifts to the IGTs. The Proposer confirmed that IGTs would be notified through IX's delivery mechanisms whether there has been an issue sending the RPC backing data. In the event of a catastrophic incident, DSC contract managers would be notified as standard procedure, as specified in the UK Link Manuals. If any file does not send correctly, the file will go into an error folder in IX, and a delivery receipt will be received if the file sends correctly. Email would only still be used in the event of catastrophic system failure, so that the IGTs can meet their delivery.

An IGT suggested that in the event of a catastrophic system failure, there is a chance that IGTs would not be able to send the RPC backing data via email by 5pm on the 5th business day of the month, as per Business Rule 7 and if the legal text reflects this risk. It was clarified that in the legal drafting, it states that email can be used to send the RPC backing data if the cut off cannot be met by the IGTs, in the event of catastrophic system failure. If the RPC backing data has not been received by the cut off, it does not mean that the invoices should not be paid on time.

The Proposer noted that in business rule 9, there could be an issue regarding contacts, as the list of DSC contract managers kept by the IGT UNC may not be up to date. The Proposer suggested that it would probably have to be addressed as part of a post-implementation review process, purely focusing on the links to the delivery of the modification, rather than sponsoring a separate modification on mandating contact details.

It was added that for business rule 10, (i), that the legal drafting covers all old mechanisms of sending RPC backing data, as the code will state that each IGT should revert to their own Network Codes.

The Proposer suggested that Business Rule 11 (The CDSP are to have the timing requirement to send files received ……. IGT173 v5.0) could be removed as it is already covered in the UK Link Manuals to which there were no further comments from the Workgroup so this Business Rule will be removed.

The Workgroup expressed an interest in Business Rule 13 and participating in an optional testing window one month before implementation.

The CDSP presented the [ROM response](#) for IGT173 to the Workgroup.

Workgroup Discussions (March 2024)

In relation to Business Rule 3 the CDSP will continue to support new and existing Shippers and IGTs based on approved processes already defined in Governance processes.

The Workgroup agreed that they will continue to plan for a post-implementation review. This will be at one month, three months and six months post-implementation as a minimum.

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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 'Safety' in this instance is the protection of consumer date by reducing the opportunity of incorrect cascading of 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	☐
REC	☐
Other	☒

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None	☐

Environmental Impacts

No identifiable benefits.

Workgroup Discussions (March 2024)

The Workgroup agree that this Modification does not impact a SCR.

The Workgroup agree with the Consumer impacts statement and the proposed impacts on the Consumer Benefit Areas highlighted by the Proposer.

The Workgroup had no further comments in relation Cross-Code and Environmental 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 provide benefits to Objective F because

- It will provide a consistent method of delivery for the RPC Supporting Data

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- 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 Shipper's time when removing the passwords to enable loading of the data.

Workgroup Discussions (March 2024)

The Workgroup agree with the Proposer's reasons for a positive impact on relevant objective (F).

8 Implementation

November 2024 release

As per business rule 12 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.

Workgroup Discussions (January 2024)

The Proposer added that while they had formatted this Modification with the intention of a November 2024 release, they understood the need to find a suitable design.

Workgroup Discussions (March 2024)

The supporting XRN has already been raised for this Modification. The Proposer is still looking for a November release and there was no consensus within the Workgroup regarding the implementation date. The Workgroup would recommend to Panel that a question is raised within the Consultation to ask if parties are in support of a November release or would require a 6-month lead time and therefore a February release.

9 Legal Text

Text Commentary

The Legal Draft can be found on the IGT173 page of the IGT UNC website here.

Workgroup Discussions (March 2024)

Subject to the minor changes discussed during the Workgroup in March the Workgroup are satisfied with the Legal Text and that it meets the solution.

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10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup recommends to Panel that:

• this Modification should proceed to consultation.

Workgroup Discussions (March 2024)

The Workgroup recommend to Panel that the Implementation Question is highlighted within the Consultation to identify if parties are in support of a November release or would require a 6-month lead time and therefore a February release.

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