

## Consultation Response

# IGT173: Gateway Delivery for RPC Backing Data

Responses invited by: 17<sup>th</sup> April 2024

### Respondent Details

Name: Gareth Powell  
Organisation: E.ON

Support Implementation	<input checked="" type="checkbox"/>
Qualified Support	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Do Not Support	<input type="checkbox"/>

## **Please briefly summarise the key reason(s) for your support / opposition**

This change will bring a positive benefit to most IGTs and Shippers, this is because of process consistency (using the IX for backing data files, the same as the GTs) rather than a differing process per IGT. Today this is hard to manage and could be difficult for new IGTs/Shippers to build processes around.

This change will also reduce manual FTE requirements for most Parties because of the removal of the need to apply the password protocols. There is also an added benefit of improved security of the data utilising the IX rather than email as it will ensure all files are transmitted with consistent encryption (as some IGTs are not password protecting at all).

The solution outlines key processes contingency plans in the event of any process exceptions and there are regular planned post implementation reviews to identify and address anything which has not been identified through the development of the modification.

Automating the delivery also reduces the number of friction points and inconsistencies and utilises a tried and tested centralised approach for the backing data alone.

**Self-Governance Statement**

**Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?**

Yes we are supportive of this following the self-governance route.

**Please state any new or additional issues that you believe should be considered**

No additional issues or requirements have been identified.

**Relevant Objectives**

**How would implementation of this modification impact the relevant objectives?**

As the proposing organisation we support the relevant objectives selected and the supportive reasons outlined in the modification and workgroup report.

## **Impacts and Costs**

**What development and ongoing costs would you face if this modification was implemented?**

**In addition please note the IGT UNC Panel discussion in the Draft Modification Report (pages 9 and 12) on the matter of cost allocation.**

We recognise that cost impacts differ between the IGTs and the Shippers, the IGTs would incur a greater development cost to deliver the files via the IX. These costs could be balanced out for some by the removal of the FTE costings to manage the process as well as the queries because parties have not received correct files, correctly password protected files and challenging parties who have not applied passwords at all.

From a Shipper perspective (and as the proposer) our majority cost saving is FTE time, this is for password maintenance (which will continue as per the protocols) but the application / removal of the passwords for each individual file would be saved, we would also require automation work to establish a loading protocol into our internal systems but we estimate this to be low cost but has added security benefits and protects customer data far greater and that we feel is worthy of the investment.

We are concerned that the established ROM process for this modification saw some parties requiring detailed costs, which is not the normal approach for the IGT UNC and if the process is not fit for purpose then this is a Panel/Secretariat issue and not one for this modification's design. As the proposers we do not see this as an IGT cost, but one shared between IGTs and Shippers. A view we share at the IGT UNC and for the DSC.

## **Implementation**

**What lead time would you wish to see prior to this modification being implemented, and why?**

We are happy to implement from November 2024, this is because the modification only requires receipt of the data by Shippers, it does not mandate validation activities. We would support a February 2025 implementation should majority of parties require this.

**In particular the IGT UNC Panel are interested in whether you are in support of a November 2024 release for this Modification or would you require a 6 month lead time and therefore a February release?**

We don't require a 6 month lead time.

**Legal Text**

**Are you satisfied that the legal text will deliver the intent of the modification?**

Yes

**Additional Question from the IGT UNC Panel RE Testing**

**Would you like testing to be available prior to implementation and would you wish to participate if it was available?**

Yes we're happy to be included in testing.

**Further Comments**

**Is there anything further you wish to be taken into account?**

No

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**