

IGT173 – Post Implementation February Update v2 (post WG discussion)

Modification Recap:

[IGT173 - Gateway delivery for RPC Data - IGT UNC](#) was approved and implemented in November 2024, with the first IX files due in December 2024 (for the November billing period).

It was agreed with the IGT UNC Panel that updates at 1 / 3 / 6 month(s) post implementation would be provided.

For each observation we've made a recommendation for the WG to discuss.

Key Observations at 3 Months Post Implementation*:

- 1) Majority of the IGTs are transferring RPC files via the IX
- 2) A small number of IGTs have been emailing RPC files or submitting late
- 3) Some files are failing loading validation (info only rather than scope of the modification)

*v1 of this paper was based on the proposer's observations where v2 includes those of IGTs from 13/02/2025 WG which highlighted Shipper observations also.

Detailed Observation information:

- 1) Majority of the IGTs/Shippers are transferring RPC files via the IX

Since December 2024 the majority of IGTs are issuing the RPC files successfully via the IX, within the 5WD, and in advance of the 5pm cut off. The delivery of files within the 5WD window differs per IGT with some submitting earlier in the window and others later.

We have had to contact some IGTs to confirm RPC file issuing via the IX and IGTs have either provided the relevant information, which has confirmed compliant receipt, or it has identified where IGTs have not been submitting via the IX.

We have also identified a small number of IGTs who have been emailing and submitting via the IX.

At the 13/02/2025 WG the IGTs present confirmed that majority of the Shippers were also receiving the RPC files via the IX.

IGT173 Proposer Recommendation – Supported by the WG:

To continue to monitor and to provide the agreed 6 monthly post implementation update in May 2025.

- 2) A small number of IGTs/Shipper have been emailing RPC files or submitting late

In December and January 2 IGTs issued the RPC files via email rather than the IX. In February this reduced to 1 IGT who emailed the files.

There has been very limited communication as to why email has been used via the IX and the IGT UNC has been advised of the parties but for the purpose of this paper we have not named the individual organisations.

A review of the IGT173 approved legal text has outlined the following concerns and potential non-compliance:

- i) Clause 4.11
 - a. Naming convention should be as per the UK Link Manual but still continue to be emailed with the historic naming conventions.
 - b. Delivery mechanism – via email rather than the IX.
- ii) Clause 5.3
Daily updates to Shippers where data has not been provided has not occurred.
- iii) Clause 5.1
Some (not all) emailed backing data has not been received by 5pm on the 5th business day.
- iv) Clause 9.4(a)
The IGTs have not informed the Shipper of the need to use the contingency of email to submit the file(s). This update was only provided when the Shipper challenged the files not coming via the IX rather than being proactively provided.

At the 13/02/2025 WG the IGTs present confirmed that a number of IGTs (1 large and a few small) had requested that files were still emailed. With the large Shipper refusing payment as part of the discussions.

There is no clause in IGT173 which allows for Shippers to request the mechanism which data is delivered by, and therefore the requests are not in accordance to the approved IGT173 drafting. The modification also made it clear that payment is not linked to the receipt of the RPC data and this is also not in accordance with the modification approved.

IGT173 Proposer Recommendations – superseded by WG Recommendations:

- 1) For the IGT UNC Panel to write to the IGT(s) and understand when they will deliver an IGT173 compliant solution.
- 2) For the proposer to continue to monitor delivery over the coming months and report back to WG/Panel if any further issues arise as part of the May 2025 update.

13/02/2025 WG Recommendations:

- 1. The WG supported the proposer’s suggestion to present an update to the IGT UNC Panel
 - The IGT UNC will email Parties to ask for feedback from all parties about any challenges which they want Panel to consider
 - It was agreed this would be a quick turnaround, however the WG didn’t want to wait for the March Panel meeting
- 2. The WG supported that the IGT UNC Panel should be made aware of the names of the IGT/Shippers who are not following IGT UNC to decide on their next steps
 - The WG suggested letters to the organisations to remind them of their obligations
- 3. The WG agreed that no changes are required to the current IGT173 approved legal drafting but agreed to continue to monitor and discuss further if needed

- 3) Some files are failing loading validation (info only rather than scope of the modification)

Majority of the files received were loaded successfully. We have identified two issues in the Feb 2025 data loads (which have been highlighted to the issuing IGT(s))

- i) Duplicate data issued for the same billing period
- ii) Length of MSN longer than the permitted value

IGT173 Proposer Recommendation – Supported by the WG:

For Shippers to continue to monitor the data issues within the files and to raise with the IGTs directly.

Proposers 3-month Review Conclusions:

Majority of the IGTs are adhering to the new delivery mechanism and delivering the data within the required timings.

The IGTs who are not utilising the IX, they also have not been fully following the relevant clauses to support system failure / contingency management.

Since implementation, as the proposers we have been monitoring the benefits against the objectives outlined in the modification. We have been able to realise positive benefits, mainly in timing efficiently, and we believe this will further increase when all IGTs utilise the IX.

WG 3-month Review Conclusion:

The WG supported the proposers review conclusions but extended them to also include the Shipper observations and the points added to the paper above.

Next Steps:

- 1) This paper will be presented at the IGT UNC Panel and will focus on the recommendations agreed as part of section 2
- 2) The proposer of IGT173 will provide a final post implementation update in May 2025.