

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	5 November 2007
<b>Reference</b>	iGT005 Consultation
<b>Title</b>	AQ Review Process - Requirement for IGTs to operate an AQ Review Process in line with that followed under the UNC
<b>Respondee</b>	SSE Energy Supply Ltd
<b>Position on the Modification</b>	Do not support Modification
<b>Facilitation of the relevant objectives</b>	
<p>It is difficult to see how this Mod will improve the effectiveness of the AQ Process by itself, therefore we do not believe that it would necessarily facilitate the Relevant Objectives.</p>	
<b>Additional Information and Comments</b>	
<p>This Mod proposes that Small Transporters adopt the same AQ Review procedure (and file formats?) as the Large Transporters/xoserve. As I understand it, it would introduce a few additional steps to allow Shippers to challenge As, and probably adjust a few existing timescales, which in principle should make the process more robust and may not be too much of an impact in terms of system and procedure changes. However, it is implied, but not explicitly stated, that the xoserve file formats would also be adopted. Whilst this again has some appeal in principle, it would be a significant system change so clarification is required before we can accurately assess the effect and cost of implementation.</p> <p>My recommendation would be for this Mod Proposal to be returned to the originator to be redrafted to provide much greater clarity of what precisely is being proposed. The new process must be fully annunciated, including an 'end to end' process map setting out timescales, the specific data flows to be utilised, and the business rules to be adopted. This would enable all Parties to fully understand and analyse the proposed changes.</p> <p>The legal text to be added to the IGT UNC will also need to be clearly defined, and must not simply cross refer to the UNC or xoserve documentation, which not all Parties will have access to.</p> <p>I am also a little concerned by the proposed implementation date - 1st October 2008. The Mod seems to be suggesting that the new process would actually be used for AQs that are finalised with effect from 1/10/08, i.e. the ones that are reviewed and amended in the months prior to October, so in practice, the actual date the system changes would need to be in place by would be nearer May 2008. As the Mod is not expected to be presented to Ofgem until late December 2007, May would not give us the recommended 6 months notice for system changes following Authority Decision.</p>	

It is hard to see how this proposal will automatically improve the quality of AQ Values, as a Mod by itself. First and foremost it seems important to put IT and Business time and effort into making sure that the I&C Reconciliation Process is implemented in full. Making sure that more meter reads are obtained by Shippers and sent to Transporters on a regular basis is paramount to the AQ Process working, but performance in this area has been poor to date. Without regular reads for all SPs, implementing this new AQ Review Process will only have a limited success in transforming the AQ Values to be reflective of actual use.

Completed forms should be returned to the iGT UNC Representative, Gemserv Ltd at [iGT-UNC@gemserv.com](mailto:iGT-UNC@gemserv.com) or faxed to 020 7090 1001