

Ms C Wheeler
Industry Codes and Licensing
Ofgem
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24th June 2009

Dear Catherine

Implementation of iGT UNC Modifications iGT013VV (Inspection Notification File Format and Response File), iGT014 (iGT Meter Reading Rules and Rejection Codes), iGT015VV (Use of Unbundled Meter Readings File Format and Response Files for Cyclic Meter Readings) and iGT016 (Submission of more frequent Cyclic Readings).

Request for Deferment

I am writing on behalf of the iGTs following a discussion at the iGT UNC Panel of 17 June 2009 to request Authority consent to a further deferment of the implementation date for the above Modification Proposals until the February 2010 release of the iGT UNC.

Background

These modifications relating to iGT Meter Readings were recommended for implementation by the Authority in July 2008. As the Panel had agreed an implementation lead time of six months, the Representative informed the iGT UNC Parties that these Modifications would be implemented in the February 2009 release of the iGT UNC.

Subsequently some issues with the operability of the proposals were highlighted and following an industry meeting in December 2008 it was agreed that the February implementation date was no longer feasible. Following discussion at the January 2009 Panel a request to the Authority for deferral to the November 2009 release was made and in Ofgem's response, dated 28 January 2009, you consented to this request.

On 9 March 2009 Modification Proposals iGT023 (Inspection Notification File Format) and iGT024 (Inspection Notification File Numbering - Consecutive) were raised with a view to addressing the problems that had been identified at the December meeting. iGT024 was subsequently varied and an alternate was raised when it became clear that the industry had mixed views over whether the file numbering validation should be based on Consecutive or Sequential numbering. Final Modification reports for iGT024VV (Inspection Notification and Cyclical Read File Format and Response File - Clarification of File Naming Convention - Sequential) and iGT024VAV (Inspection Notification and Cyclical Read File Format and Response File - Clarification of File Naming Convention - Consecutive) were issued to the Authority on 29 May 2009 for a decision on implementation.

At the May 2009 Panel, a concern was raised that, because of continued uncertainty on the timing of a direction to implement these modifications and the lead time for IT development, the November 2009 implementation date for iGT13VV and iGT015VV could be problematic. However as the Panel had already agreed to an accelerated timetable for

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iGT023 and iGT024, it was felt that a decision on requesting a further deferral of the implementation date could be delayed until the June Panel to give both a better idea of when the Authority would be able to make its decision and for all Parties to give further consideration to their IT implementation plans.

At the June Panel, whilst Ofgem informed Panel Members that a decision on the modifications was due before the end of June, the Users' Panel Representatives had also received additional feedback from iGT Shippers that led them to believe that a November implementation would not be possible. As such, they requested that a further delay to the February 2009 iGT UNC release should be considered. The iGT Operators' Panel Members, whilst they believed that they would be able to change their own systems in time, recognised that it was important that the Shippers were also able to process these meter readings fully in line with the proposed new rules and as such, also supported a deferral to the February 2009 release.

Summary

I am therefore writing to you to request that the Authority consent to the implementation date for modifications iGT013VV, iGT014, iGT015VV and iGT016 be deferred to the February 2010 release of the iGT UNC.

I look forward to your support in this matter.

Yours sincerely

Steve Ladle
Modification Panel Chairman

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