

## iGT UNC / iGT INC Consultation Response

<b>Date</b>	14/12/07
<b>Reference</b>	UGI034/GTC0343/GPL042 Consultation
<b>Title</b>	Mandatory Use of Defined File Formats For Change of Supply and Change of Supply Meter Readings
<b>Respondee</b>	Lorraine McGregor, ScottishPower Energy Management Limited (SPEML)
<b>Position on the Modification</b>	Do not support Modification

### Facilitation of the relevant objectives

Although SPEML welcome the introduction of a robust change management process and believe that this is in the interest of all parties, we do not think the current Modification will fully achieve such an objective. As is stated within the Modification, there is currently work being conducted under iGT004 to introduce standardised Change of Supply processes across the iGT Community. SPEML fully believe that the use of standardised file formats and processes for fundamental and core operations is required in order to fully achieve the relative objective of facilitating 'the securing of effective competition between relevant Shippers and between relevant Suppliers'. With regards to facilitation of 'efficient and economic operation of the pipe-line system', SPEML support the Proposers thoughts on limiting the requirement for any party to make short-notice system changes. However, it is not in the interest of any party to make short-notice system changes, particularly to the core processes associated with Change of Supply and the current arrangements have worked fairly well in the past with most changes being mutually agreed with appropriate implementation timescales. As stated above, SPEML do believe formal governance around the core processes of Change of Supply is required in the iGT Industry, but do not believe this Modification helps achieve this aim.

### Additional Information and Comments

While we are not against the principle of introducing formal governance around existing processes between GTC, GPL and UGI, we believe that this cannot be in isolation and common file formats and processes across the iGT Community are required. If this Modification was to be implemented it would result in GTC, GPL and UGI differing from the other iGTs. This is not something SPEML desire. The implementation of this Modification could also set a precedent for other iGTs, which could result in all iGTs introducing formal governance around their existing processes into Short Code, with any additional Mods to a Short Code resulting in divergence and requiring similar Mods to be raised across all iGTs. This takes us back to the fragmentation that existed prior to the introduction of the iGT UNC.

For these reasons SPEML do not support this Modification.

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