

Stage 04: Final Modification Report

iGT074S:

Amendment of Password Protection Ancillary document

At what stage is this document in the process?

- 01 Modification Proposal
- 02 Workgroup Report
- 03 Draft Modification Report
- 04 Final Modification Report



This modification seeks to amend the Password Protection ancillary document within iGT UNC Section K in line with the introduction of Single Service Provision.



Panel determined implementation



High Impact:



Medium Impact:



Low Impact:
iGT, Shippers

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About this document:

This document is a Final Modification Report, presented to the Panel on 17th June 2015.

The Authority will consider the Panel's recommendation and decide whether or not this change should be made.



Any questions?

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1. Plain English Summary

Is this a Self-Governance Modification?

Panel determined that this is a self-governance Modification.

If so, will this be progressed as a Fast Track Modification?

No.

Rationale for Change

The introduction of Single Service Provision (SSP) will move processes previously provisioned under the iGT UNC into the UNC and will be conducted by Xoserve therefore the wording of the Password Protection ancillary document requires minor edits to be in keeping with processes post SSP. For clarity, these edits will only become effective if and when iGT039 is implemented.

Solution

This modification seeks to amend the Password Protection ancillary document in Section K to coincide with the introduction of Single Service Provision (iGT039) legal text amendments.

Clarity on examples has also been suggested in line with the documents which will utilise the passwords created.

Relevant Objectives

The proposer believes this modification better facilitates Objective (f) - Promotion of efficiency in the implementation and administration of the Code.

Implementation

The implementation of this modification will be conjunction with the delivery of the implementation of Single Service Provision (iGT039).

2. Rationale for Change?

As part of iGT039 working group it was highlighted that changes in processes following the introduction of Single Service Provision (SSP) could result in some of the current ancillary documents becoming redundant. In November 2014 the iGT Shipper Workgroup reviewed all ancillary documents within Section K-2.

The group confirmed the Password Protection ancillary document would still be required post SSP but for the avoidance of doubt when using the document minor edits are proposed to ensure the document remains current and robust.

The Workgroup agreed that the Rationale for Change was appropriate and complete.

3. Solution

To edit two parts of the document

- The Introduction
 - Removing Customer with Special Needs Files from the introduction

- The example used in Section 3
 - Currently the example gives a period of February to April, portfolios are not issued with date ranges like this so it is suggested to use two clear examples; RPC for invoicing and the Portfolio data extract.

Introduction

This document sets out the operating principles for the password protection of specified "Protected Information" in the iGT UNC under Section K clause 23 - relating only to the provision of invoice supporting data and Portfolio Extracts ~~and Customers with Special Needs files~~ between the Pipeline User and Pipeline Operators.

Section 3

For example:

~~*Portfolio data covering the period 1st February to 30th April – the February password will apply.*~~

Portfolio Data

The 'Issue Date' is used to select the respective password. For example 20150102 (YYYYMMDD) – The January password would apply.

Invoice supporting data

The 'Start Date' is used to select the respective password. For example 02/01/2015 (DDMMYYYY) – The January password would apply

Following consideration of the Modification and discussion around any alternative solutions, the Workgroup noted that a further change was required in the main iGT UNC Part K 23.2 (a):

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23.2 For the purposes of the Pipeline Operator's obligations under Clause 23.1:

(a) "Protected Information" means any information relating to the affairs of a Pipeline User which is obtained by the Pipeline Operator pursuant to or in the course of the negotiation, implementation or performance of the Code, the Framework Agreement or any Ancillary Agreement to which that Pipeline User is party. For the sake of clarity this includes invoice supporting data and Portfolio Extracts ~~and Customer with Special Needs files~~ sent between the Pipeline User and Pipeline Operator. When the Pipeline Operator or User sends such data either by email or CD/DVD they must use password protection as detailed in the iGT UNC Ancillary Document "Password Protection Protocols";

4. Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	None
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	Positive
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

The Workgroup considers that this Modification would facilitate:

Objective (f)

The introduction of iGT039 will introduce a Single Service Provision which renders part one of the processes named in the Password Protection document redundant therefore of its reference will be prudent to ensure the appropriate processes are followed and referenced within the iGT UNC. The amendments of the examples gives additional clarity on the application of the passwords.

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5. Impacts and Costs

The Workgroup considered that there were no impacts or significant costs of implementation.

6. Likely Impact on Consumers

The Workgroup considered that there were no likely impacts on consumers.

7. Likely Impact on Environment

The Workgroup did not identify any likely impact.

8. Implementation

The Workgroup agreed that implementation of iGT074 must be aligned with the Project Nexus Go Live Date (currently 1st October 2015, subject to amendment).

9. Legal Text

Extract from the Password Protection Ancillary Document:

Introduction

This document sets out the operating principles for the password protection of specified “Protected Information” in the iGT UNC under Section K clause 23 - relating only to the provision of invoice supporting data and Portfolio Extracts ~~and Customers with Special Needs files~~ between the Pipeline User and Pipeline Operators.

Section 3

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Extract from iGT UNC Part K:

23.2 For the purposes of the Pipeline Operator’s obligations under Clause 23.1:

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(a) "Protected Information" means any information relating to the affairs of a Pipeline User which is obtained by the Pipeline Operator pursuant to or in the course of the negotiation, implementation or performance of the Code, the Framework Agreement or any Ancillary Agreement to which that Pipeline User is party. For the sake of clarity this includes invoice supporting data and Portfolio Extracts ~~and Customer with Special Needs files~~ sent between the Pipeline User and Pipeline Operator. When the Pipeline Operator or User sends such data either by email or CD/DVD they must use password protection as detailed in the iGT UNC Ancillary Document "Password Protection Protocols";

10. Consultation Responses

Representations were received from the following parties:

Company / Organisation Name	Support Implementation or Not?
Npower	Supports
SSE Supply	Supports
E.ON UK	Support

Summary of Comments

Self-Governance

All respondents agreed that the Modification does meet the criteria for Self-Governance.

Relevant Objectives

All respondents agreed that the Modification better facilitates Relevant Objective (f) "Promotion of efficiency in the implementation and administration of the Code".

Impacts and Costs

No impacts or costs of implementing this Modification were identified.

Legal Text

All respondents considered that the legal text fully achieved the requirements of the solution.

Implementation

All respondents considered that the implementation should be aligned with the Project Nexus Implementation Date.

Further Comments

None.

11. Panel Discussions

Panel met on 17th June 2015 and considered the responses to the DMR consultation.

Panel agreed that the Mod better facilitates Objective (f) and identified no further issues.

Panel unanimously agreed to implement iGT074S with an Implementation Date aligned with the go-live date for Project Nexus.

12. Recommendation

Having considered the Modification Report for iGT074S, the Panel determines:

- that proposed Modification iGT074S should be made

The Panel sets an implementation date aligned with the go-live date for Project Nexus.