

Representation For.0083

"Proposal to insert obligations to process data received from iGTs in line with the requirements as outlined within Annex A of the Connected System Exit Point (CSEP) Network Exit Agreement (NExA)"
Version 1.0

Date of Communication: 01/06/2006
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Slant: For
Strictly Confidential: No
Abstract

As the Proposer of the above Modification, ScottishPower fully support its implementation.

A suite of Modifications have been raised to iGT Network Codes to insert the obligations currently outlined within Annex A of the CSEP NExA. Modification 83 places reciprocal obligations on Large Transporters and will ensure appropriate governance of the operational arrangements currently outlined within Annex A. The key objective of Modification 83 is to oblige Large Transporters through their service provider, xoserve, to process data received from iGTs in relation to AQ Updates and to acknowledge receipt of I&C reconciliation data within set timescales. This will ensure that data received from iGTs is managed and thereafter processed in a timely manner. While we recognise the limitations of validating the content of iGT data submissions, Shippers are afforded a degree of comfort that files received by xoserve will be actioned within the timescales prescribed within the Modification proposal should it be accepted. Should files be rejected, these will be returned to the individual iGT who can then take appropriate action to rectify the position. In addition the Modification will place an obligation on Large Transporters to keep iGTs up to date with the development of End User Categories for Gas Year.

ScottishPower have been concerned for sometime over the frequency of AQ Update submissions by iGTs and the alternative arrangements that have been allowed to operate without prior agreement with Shippers. This has mainly occurred when an iGT through a particular operational constraint has been unable to fulfil weekly updates provisions. This Modification will ensure that no changes to the frequency of the AQ Updates are permissible without prior consultation with CSEP Users and approval by Ofgem.

ScottishPower believe that placing CSEP NExA obligations within Network Codes will introduce a degree of visibility on iGT update activity and will allow shippers the opportunity to propose further changes aimed at improving overall process. We remain concerned over the current operational arrangements regarding AQ Updates, the process involving Nested CSEP updates, the lack of transparency on whether all updates are being submitted, and the manual operations that support the overall process. To ensure that a robust enduring solution is achieved we firmly believe that collectively the iGTs and Large Transporters need to work together to bring about a viable solution.

Kind Regards
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