

IGT Modifications iGT092 and iGT092A – Note for the workstream 5th January 2016

An alternative modification has been raised against iGT092 – Implementation of Non Effective Days for Project Nexus Implementation. The alternative is entitled iGT092A Implementation of Non Effective Days for Project Nexus Implementation – maintaining a minimum of two Supply Point System Business Days.

The key difference between the 2 modifications which both seek to introduce 9 Non Effective Days (plus 3 variant non business Days) into the Code to ensure that Xoserve has sufficient time to carry out the activities it needs to do to ensure a successful cutover to Nexus, is in relation to the number of days Shippers will have available to consider whether an Objection to a proposed supply point transfer should be raised.

In assessing the relative merits of each of the modifications, the workgroup will need to consider the impact of each of the proposals on the industry and assess how each modification supports the Relevant Objectives that are set out for the Code.

To facilitate this assessment we believe the following areas are important in terms of assessing the differences between the two modifications.

iGT092 ensures that there will always be at least 1 day during which the current Registered Shipper will be able to receive the notice that another Shipper is proposing to take over responsibility for a Supply Point and if deemed appropriate, to raise an objection to that transfer. Discussions in the joint 0602 / iGT092 modification workgroup on 22nd December 2016 focussed upon minimum confirmation timescales for the Confirmation Effective Date of 8th June 2017 where files may be received over the weekend preceding Monday 22nd May so that notification to the incumbent User would not be received until the first run of the Confirmation suite of jobs at around 1200hrs on the 22nd May. The objection must be received no later than 2300hrs later that day.

iGT092A suggests that 1 day may be insufficient and proposes a minimum of 2 days. The Proposer states that this will reduce the risk to customers that objections cannot be made. This should reduce the potential for erroneous transfers which the Proposer believes is higher where the Objection period is only 1 day.

Both modifications extend the period between the day a Supply Point Confirmation is initiated through to the day the Supply Point Registration takes effect, in order to accommodate the introduction of the 9 Non Effective Days.

For iGT092, affected Supply Point Registration dates are the 1st June through to the 14th June with amended Confirmation submission deadlines being the 17th May through to the 22nd May. By introducing this there are 3 Supply Point Registration Dates where the overall transfer period will exceed the 21 Days set out in the licence (the 12th, 13th and 14th June).

For iGT092A, affected Supply Point Registration dates are the 31st May through to the 14th June with amended Confirmation submission deadlines being the 16th May through to the 22nd May. By introducing this there are 6 Supply Point Registration Dates where the overall transfer period will exceed the 21 Days set out in the licence (the 6th, 7th and 8th June and the 12th, 13th and 14th June).

This difference will affect all proposed switches made for those dates.

Against this iGT092A puts forward the argument that its proposal will reduce the potential for erroneous transfers where the incumbent Shipper does not have sufficient time under iGT092 to both receive the notice of intended transfer, assess whether the transfer is allowable (which may require contacting the customer) and issuing the Objection.

iGT092A also suggests that the move to introduce a minimum of 2 days for the management of Objections will give Shippers the option to use the prior weekend period for the management of legacy interfaces and the implementation of updated systems in a manner more consistent with other large scale implementations.

The Code Administrator believes the benefits of this should be discussed as well as why iGT092 will not be able to offer this option.

NOTE: Analysis carried out for iGT082 suggested that re iGT Supply Point there were an average of 568 Supply Point Transfers (based on 1.5 million iGT Supply Points) per Day. (Information assessed using average October transfer figures for the GTs). The corresponding number for GT Supply Points was just under 8,000 transfers per day. No figures were presented for the average number of Objections raised against these although these figures may be useful if they are known.