

Modification proposal:	Independent Gas Transporter (iGT) Uniform Network Code (UNC): 'Inspection Notification File Format and Response File – Inclusion of .FRJ (including S71) and .ERR files (including E01 header)' (iGT UNC 023)		
Decision:	The Authority ¹ directs that this proposal be made		
Target audience:	Gemserv, Parties to the iGT UNC and other interested parties		
Date of publication:	03 July 2009	Implementation Date:	To be confirmed by the Representative of the iGT UNC

Background to the modification proposal

When a Shipper submits meter reading files comprising cyclical meter reads or meter inspection notifications to an iGT, the iGT may generate either .ERR or .FRJ files (but not both) rejecting the submitted files where there is a problem with them. ERR files (incorporating the E01 header record) may be generated when rejections are caused by errors in records, e.g. missing mandatory data from a record. FRJ files (incorporating the S71 record which states the filename of the file that has been rejected) may be generated when the filename has already been processed, or where the format validation has failed.

On 1 July 2008, the Authority approved proposals iGT UNC 013VV and iGT UNC 015VV. These proposals were part of a suite of changes mandating Shippers to use unbundled meter reading file formats when they submit their meter inspection notification and cyclical meter reads files to iGTs. The iGTs will acknowledge receipt of the files and either accept or reject them within prescribed timescales. These proposals are currently scheduled to be implemented in the November 2009 iGT UNC document release.

Since approval, some parties have identified that the '.FRJ (including the S71)' and '.ERR (including the E01)' files are missing from the suite of changes. The industry has agreed that the inclusion of these files in the suite of changes is necessary for completeness.

The modification proposal

ScottishPower (the 'proposer') raised iGT UNC 023 (the 'Proposal') in March 2009 to introduce the missing files into the planned suite of changes which have been approved. The proposer suggested that the dependency of the missing files on the approved changes requires that the Proposal is considered on a shortened timetable to ensure its timely implementation as part of the November 2009 release.

iGT UNC Panel² recommendation

At its meeting of 20 May 2009, the iGT UNC Panel agreed unanimously to recommend implementation of the Proposal with implementation as part of the November 2009

¹ The terms 'the Authority', 'Ofgem' and 'we' are used interchangeably in this document. Ofgem is the Office of the Gas and Electricity Markets Authority.

² The iGT UNC Panel is established and constituted from time to time pursuant to and in accordance with the iGT UNC Modification Rules.

Release. There was unanimous support from Shippers and iGTs who responded to the consultation on the Proposal. The Panel agreed that the Proposal promotes the efficient discharge of the licensees' obligations under the iGT UNC and secures effective competition between relevant shippers and suppliers.

The Authority's decision

The Authority has considered the issues raised by the Proposal and the Final Modification Report dated 28 May 2009. The Authority has concluded that:

1. implementation of the Proposal would further the relevant objectives as defined in Standard Condition 9 of the Gas Transporters Licence³; and
2. directing that the Proposal be made is consistent with the Authority's principal objective and statutory duties.

Reasons for the Authority's decision

We note that there was broad industry agreement on the inclusion of the missing file formats prior to the raising of the Proposal. We also note the unanimous support for the Proposal from those who responded to the consultations on the Proposal and the Draft Modification Report.

Whilst noting that the iGT UNC Panel considered this proposal would further relevant objective c) *'the efficient discharge of the licensee's obligation under its licence'*, no substantive comments were provided in the minutes of the meeting. Upon consideration, we agree with the majority of respondents who suggested that this proposal would better facilitate relevant objectives f) of the iGT UNC *'the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code'*.

We agree that omitting the missing file formats from the suite of changes to the use of meter reading file formats which are to be implemented in the November 2009 release could adversely affect the robustness of these processes. There would be a risk that validation and rejection of files is treated inconsistently by iGTs, resulting in confusion for the Shippers who are submitting files to them. A consistent uniform approach to the validation and rejection of files by iGTs will ensure that they can deal more efficiently with files sent to them by Shippers.

Whilst this proposal relates to a technical matter and we can see no reason to reject it, it is nonetheless disappointing that little or no effort was made to provide a robust rationale for this proposal against the relative objectives. We do not consider it is sufficient simply to state which objectives the proposal better facilitates but require, to a reasonable level of detail, some explanation of the justification for the proposal against the relevant objectives. We would hope that future modification reports have regard to this necessity.

³ As set out in Standard Condition 9 of the Gas Transporters Licence, see: http://epr.ofgem.gov.uk/document_fetch.php?documentid=13355

Decision notice

In accordance with Standard Condition 9 of the Gas Transporters Licence, the Authority, hereby directs that iGT UNC modification proposal 023: *'Inspection Notification File Format and Response File – Inclusion of .FRJ (including S71) and .ERR files (including E01 header)'* be made.

Mark Feather,
Director of Industry Codes and Licensing, Corporate Affairs
Signed on behalf of the Authority and authorised for that purpose.