

Modification proposal:	Independent Gas Transporter Uniform Network Code (iGT UNC): Inclusion of SPA Fax Forms as a Ancillary Document (iGT037)		
Decision:	The Authority ¹ directs that the proposal be made		
Target audience:	Independent Gas Transporters (iGTs), Parties to the iGT UNC and other interested parties		
Date of publication:	2 February 2012	Implementation Date:	To be confirmed

Background to the modification proposal

The SPA Fax Forms ("Fax Forms") are forms used by Pipeline Operators and Pipeline Users to exchange a standard set of data as part of the change of supply process.

The Fax Forms are generally considered the industry default supply point registration forms, to be used by iGT UNC parties during the change of supply process, in the absence of any alternative arrangements agreed between relevant iGT UNC parties. However, some Pipeline Operators have introduced and utilise their own electronic systems and procedures for managing change of supply processes.

The Fax Forms are not currently part of iGT UNC and as such are not subject to any formal governance arrangements or change management procedures.

The modification proposal

The modification proposal seeks to designate the Fax Forms as an Ancillary Document to the iGT UNC. The concept of Ancillary Documents was introduced by iGT UNC Modification 008 'Ancillary Documents'². Ancillary Documents are primarily of a technical nature and cover operational procedures. iGT008 also set out a number of supporting provisions for Ancillary Documents including, amongst other things, provisions with respect to making changes to such documents.

It should be noted that the modification proposal does not propose any changes to the Fax Forms themselves or to current working practices. The proposal only seeks to designate the Fax Forms as an Ancillary Document to the iGT UNC. This will bring the Fax Forms into formal governance arrangements and also ensure that any future changes to the Fax Forms are subject to the change management provisions of Ancillary Documents.

iGT UNC Panel recommendation

The modification was considered at the iGT UNC panel on 21 December 2011. The Panel voted unanimously in favour of implementing the modification.

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 iGT UNC 008, Decision letter, 13 February 2008.

<http://www.ofgem.gov.uk/Licensing/GasCodes/iGTCodes/Mods/Documents1/iGTUNC008D.pdf>

The Authority's decision

The Authority has considered the issues raised by the modification proposal and the Final Modification Report (FMR) dated 30 December 2011. The Authority has concluded that:

1. implementation of the modification proposal would better facilitate the achievement of the relevant objectives of the iGT UNC as defined in Standard Condition 9 of the Gas Transporters Licence³; and
2. directing that the modifications be made is consistent with the Authority's principal objective and statutory duties.

Reasons for Authority's decision

The iGT UNC Panel considered the modification proposal to better facilitate relevant objective (f). In particular, that the proposed modification improves efficiency and administration of the iGT UNC by bringing the Fax Forms into formal governance arrangements and making them subject to a formal change management process.

We note that all five respondents supported the proposal and also that there was a general consensus amongst respondents that the proposal addressed a lack of formal governance and change management arrangements with respect to Fax Forms. We also note that all respondents considered the modification proposal to better facilitate relevant objective (f) with one respondent indicating that it also facilitates relevant objective (b) but did not explain how.

We consider the modification better facilitates relevant objective (f), and is neutral in relation to all other objectives.

Objective (f): the promotion of efficiency in the implementation and administration of the network code

We note the Panel's comments in the FMR that several changes may be needed to the Fax Forms in future. We also note the comments of one respondent who stated that it had identified a number of minor differences between the forms used by different parties. We support that respondents' suggestion that it may be beneficial for the iGT-Shipper workgroup to consider these differences further and raise amendments as appropriate.

We agree with the majority view that designating the Fax Forms as an Ancillary Document to the iGT UNC would address the current lack of formal governance with respect to Fax Forms and also provide a more robust and transparent process for making changes to them.

Decision notice

In accordance with SLC 9 of the Gas Transporter licence, the Authority directs that modification proposal iGT037: "Inclusion of SPA Fax Forms as an Ancillary Document" be made.

Declan Tomany

Associate Partner, Smarter Grids and Governance

Signed on behalf of the Authority and authorised for that purpose.

³ Gas transporter licence standard conditions http://epr.ofgem.gov.uk/document_fetch.php?documentid=14307