IGT | UNC

## Consultation Response

# IGT110V: Mandating the provision of NDM sample data

Responses invited by: 07 Sep 2018

### Respondent Details

Name: Chris Barker

Organisation: BUUK Infrastructure

| | |
|---|---|
| Support Implementation | ☐ |
| Qualified Support | X |
| Neutral | ☐ |
| Do Not Support | ☐ |

### Please briefly summarise the key reason(s) for your support / opposition

We support the intent and proposals from IGT110V and support the modification on the condition that it is implemented in line with UNC 654, following its own approval. This is due to the proposed legal text changes from IGT110V pointing over to the UNC, and if UNC 654 is not approved there is little sense for IGT110V's own implementation. As either the codes would not align, or Shipper data would only be collected from IGTs which would not be efficient for the purposes of profiling as the modification intends.

Under this condition the proposed changes will allow for more efficient data analysis around profiling activities. The minimum standards will act as a suitable benchmark with the option for additional submission of data from parties throughout the year.


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## Self-Governance Statement

**Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?**

Whilst it is noted that the UNC Panel has recommended that the UNC mirror modification, UNC 654, should be implemented via Authority consent, we agree with the proposers for UNC 654 and this IGT110V that the change should progress through Self Governance. This is due to there being no identified material impacts with the change focused on reporting from sample data.

## Please state any new or additional issues that you believe should be considered

None

## Relevant Objectives

**How would implementation of this modification impact the relevant objectives?**

It is agreed that the modification would have a positive impact on Relevant Objective F. While the comments around objective D are noted it is felt the primary influence of the modification would be on objective F.

## Impacts and Costs

**What development and ongoing costs would you face if this modification was implemented?**

Minimal

## Implementation

**What lead time would you wish to see prior to this modification being implemented, and why?**

In line with the workgroups assessment it is agreed that implementation should fall in line with UNC 654 if it too is approved.

## Legal Text

**Are you satisfied that the legal text will deliver the intent of the modification?**

The legal text provided seems sufficient to meet the intent.


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## Further Comments

**Is there anything further you wish to be taken into account?**

None.

**Responses should be submitted by email to IGTUNC@gemserv.com**


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