

Consultation Response

IGT144U - Ability to Reflect the Correct Customer Network Use and System Offtake Quantity (SOQ) During COVID-19

Responses invited by: 22.05.20

Respondent Details

Name: Jenny Rawlinson

Organisation: BUUK

Support Implementation ☐

Qualified Support ☐

Neutral ☐

Do Not Support ☒

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

Whilst BUUK recognises the intention of this modification proposal, and that implementation would have no impact on IGTs specifically, we do have concerns regarding:

- a. Whether the change will have the positive result that it is perceived to have or whether there is a more appropriate approach, and
- b. The potential resulting transfer of risk to other code parties and, ultimately, consumers.

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?

BUUK agrees that the modification proposal should not be Self Governance.

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

As stated in the summary section, we do have concerns regarding:

- a. Whether the change will have the positive result that it is perceived to have or whether there is a more appropriate approach, and
- b. The potential resulting transfer of risk to other code parties and, ultimately, consumers.

In addition, it should be considered that we believe the implementation of this modification proposal is dependent on the implementation of the UNC equivalent modification proposal UNC 0725U as it is suspected that the CDSP would not be able to separate out the processing for GT and IGT sites.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Considering concerns raised by parties to the UNC equivalent change proposal, UNC 0725U, BUUK questions whether this change positively impacts any of the relevant objectives.

Impacts and Costs

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

None identified.

Implementation

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

If implemented there would be no lead time required.

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

Assuming that UNC 0725U is implemented and the relevant legal text added to the UNC, we believe that, if implemented, the legal text for this proposal delivers the intent of the change.

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

Whilst we recognise the urgency for these recent covid-19 changes, there is a risk that the limited timescales might not afford parties full understanding of potential impacts.

Responses should be submitted by email to iGTUNC@gemserv.com