

Consultation Response

IGT142U – Allows Users to submit estimated meter reading during covid-19

Responses invited by: 12.05.20

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

BUUK supports the principle of this modification proposal. However, we have the following concerns:

1. The legal text, which refers to defined terms within the UNC Transition Document, is dependent upon UNC 0721 being approved,
2. Whilst we agree with the intent of the ability for Users to submit estimated reads, we have concerns that they will not be distinguished from actual reads, potentially causing long-term issues,
3. We would like to understand better why Users require the ability to both submit estimated reads and to change an AQ (proposed modification IGT141U).

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?

Yes. Agree that this is not a SG modification proposal.

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

As stated within the summary:

1. The legal text, which refers to defined terms within the UNC Transition Document, is dependent upon UNC 0721 being approved,
2. Whilst we agree with the intent of the ability for Users to submit estimated reads, we have concerns that they will not be distinguished from actual reads, potentially causing long-term issues,
3. We would like to understand better why Users require the ability to both submit estimated reads and to change an AQ (proposed modification IGT141U).

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree with the proposer in that the intent of the modification proposal meets relevant objective D in allowing Shippers to provide Estimated Meter Readings during the COVID-19 pandemic and, thereby, enabling sites to be reconciled and AQs to be recalculated.

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?

No lead time required

Legal Text

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

No. We believe that there is a risk that, should UNC 0721 be rejected, the legal text will not include the relevant defined terms. For example, Relevant Period and Relevant Regulations.

Further Comments

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

None

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