IGT | UNC

Consultation Response

IGT137: Alignment of the IGTUNC to the UNC in advance of Faster Switching

Responses invited by: 22 June 2020

Respondent Details

Name: Rebecca Cailes

Organisation: BUUK

Support Implementation	☐Yes
Qualified Support	☐
Neutral	☐
Do Not Support	☐

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

BUUK support the implementation of the IGTUNC to the UNC in advance of Faster Switching; we believe it is necessary to ensure accuracy and consistency between IGTUNC and UNC. It also allows for the broader remit to facilitate Faster Switching and the addition of references to the Central Switching Service (CSS) that allows for Suppliers to make the 'switch' and to the new Retail Energy Code (REC).

A more logical ordering of the UNC is important to support Faster Switching and a re-ordering in advance is necessary; alongside the subsequent alignment of the IGTUNC references to the UNC.

If this modification is not implemented, BUUK support the Workgroup view that a risk is created and legal documentation using IGTUNC references will be inaccurate.

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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?

BUUK agree with the Modification Panel that this should be a self-governance modification.

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

BUUK do not believe there are any new or additional issues that we believe should be considered.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

BUUK believe that Relevant Objective F (Promotion of efficiency in the implementation and administration of the Code) will be better facilitated as it aligns the IGT UNC to the latest version of the UNC in readiness for the changes to Faster Switching.

Impacts and Costs

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

BUUK do not believe there will be any development or ongoing costs if this modification was implemented as the intent is simply ensuring references within the IGTUNC remain aligned to that of the UNC following the re-ordering of the UNC in advance of Faster Switching.

Implementation

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

BUUK would like to ensure the lead time matches that of UNC0708 Re-ordering of the UNC in advance of Faster Switching to ensure consistency.

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Legal Text

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

Yes, BUUK are satisfied that the legal text will deliver the intent of the modification; the Workgroup have taken samples at varying points to ensure accuracy and BUUK have been involved in this workgroup. We support the Workgroup opinion that the legal expert has undertaken a through and accurate review of the legal text.

In addition, whilst we are comfortable in letting this change progress and recognise its benefits; we can't completely endorse that the legal text fully delivers the intent of the modification as haven't undertaken a comprehensive review.

Further Comments

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

Whilst BUUK have engaged within the IGT137 Workgroup and supporting work, we feel it is important to outline that due to relevant expertise being re-deployed to other critical areas during this covid-19 situation, we have been unable to review the legal drafting as thoroughly as we would have liked.

An element of bad timing of the re-ordering exercise and the additional activity that it has caused, at an already busy (Faster Switching) time has created potentially avoidable work that with more efficient planning and a longer lead time may have been not required. With this is mind, it may have been more practical to fully engage with the change and subsequent legal review.

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

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