

Consultation Response

IGT148: Provision of Class 1 meter read service on IGT networks by the CDSP

Responses invited by: 17/05/2021

Respondent Details

Name: Rebecca Cailes

Organisation: BUUK

Support Implementation ☒ X

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We are in support of this modification, it aligns with UNC 0710 and will facilitate the change in obligation on Class 1 reads from Transporters to the CDSP, as the service, in its current format is increasingly uneconomical. We are comfortable with the transfer of liabilities and the legal text provision throughout.

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 that IGT 148 should be Self-Governance as the DM reading service is not a competitive service, nor will it be in the foreseeable future and any future tendering of the service would be through the CDSP, plus any charges levied will be of a similar value.

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?

We agree with the Workgroup that Relevant objective, (C) 'Efficient discharge of the licensee's obligations' and (F) 'Promotion of efficiency in the implementation and administration of the code will be positively impacted as obligations moving to Shippers and these changes have been accurately captured.

Impacts and Costs

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

We do not expect any costs with the implementation of this modification.

Implementation

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

To align as closely with the UNC equivalent modification, UNC 0710, so June 2021.

Legal Text

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

Yes

Further Comments

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

No further comments.

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