

## Consultation Response

# IGT161: Consequential IGT UNC changes for Switching SCR (REC 3.0)

Responses invited by: 05 MAY 2022

## Respondent Details

Name: Cher Harris

Organisation: Indigo Pipelines Ltd

Support Implementation ☒ Y

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We agree that these changes are required to facilitate the implementation of CSS and REC v3

## 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?**

We agree with the proposer that this modification is not suitable for self-governance because it introduces material changes to the Code.

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

None identified

## Relevant Objectives

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

We feel this modification positively impacts Objectives C, D & F:

C - Efficient discharge of the licensee's obligations will be supported by improvements being made to the switching processes the CDSP operates on behalf of all Transporters

D - Securing of effective competition as the new Switching Arrangements are expected to facilitate faster and more reliable switching

F - Promotion of efficiency in the implementation and administration of the Code by aligning Code with REC v3 and UNC (UNC Mod 0804)

## 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?**

Align implementation with CSS Go Live Date (expected to be 18<sup>th</sup> July 2022)

### **Legal Text**

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

We are satisfied that the legal text will deliver the intent of the modification

### **Further Comments**

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

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**