

## Consultation Response

# IGT159: Amendments to the Must Read Process

Responses invited by: 20 09 2022

### Respondent Details

Name: clare manning

Organisation: E.ON

Support Implementation Y

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We strongly support the implementation of this modification. It will address the differential treatment of certain sites between DNs and IGTs following the implementation of XRN5036 and will ensure that the must reads obtained can be used in Settlement, thereby improving UIG and the exclusion of sites with specific issues/circumstances will improve the general efficiency of the process for all the parties involved, as well as reducing costs and unnecessary contact with 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?**

Yes we agree that this should be subject to authority decision

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

No comments

### Relevant Objectives

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

We agree that the implementation of this modification would have positive implications for relevant objectives (D) Securing of effective competition and (F) Promotion of efficiency in the implementation and administration of the Code. The requirement for the submission of Must Read information within 25 Supply Point System Business Days will promote competition and improve Settlement performance. The exclusion of sites where there are issues will mean that the codes are aligned and there will be less wastage (leading to reduced costs) as there will be less visits to sites where it is not likely a read will be obtained.

### Impacts and Costs

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

We do not believe there will be any development or additional ongoing costs for our organisation, other than contributing to the cost of the CDSP processes.

### Implementation

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

As soon as possible

### Legal Text

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

yes

### Further Comments

**Should a reciprocal arrangement be added into the business rules, and therefore the Legal**

**Drafting, for the CDSP to notify an IGT where a Shipper has identified a known issue.** *(Please see "Panel Discussions" in Section 10 of the [Draft Modification Report](#) for further context and information)*

We have given consideration as requested to whether or not a reciprocal arrangement should be added to the business rules and legal text, for the CDSP to notify an IGT where a supplier has identified a known issue and we agree that this would be sensible, promoting further efficiencies in the process and thereby reducing costs to consumers. We would support this being achieved by a new modification so as to not delay the implementation of IGT159.

### **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](mailto:IGTUNC@gemserv.com)**