

## Consultation Response

# IGT159: Amendments to the Must Read Process

Responses invited by: 20/09/2022

### Respondent Details

Name: Michelle Brown

Organisation: Energy Assets Pipelines

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

EAP fully support this modification being implemented as the current must read process is not fit for purpose and there are a number of inconsistencies between codes. There is currently no timescales for a read to be obtained and provided to the shipper which can result in sites not being removed and settlement being negatively affected.

This modification will provide a positive improvement to the process by improving settlement accuracy, reducing the number of customer complaints received by Suppliers and most importantly protecting customers from additional costs and unnecessary contact associated with site visits.

## 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?**

EAP agree that this modification should not be a self-governance modification as it would result in a material change to the code, including changes to the Modification Rules and therefore should be sent for Authority Direction.

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

n/a

## Relevant Objectives

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

We consider that this change would have a positive effect on relevant objectives (D) and (F).

This modification will ensure accurate must read information and updated time frames will promote higher rates of meter read submissions resulting in more accurate AQs. More accurate gas allocation will promote competition by reducing a barrier to entry that is currently created.

The modification supports relative objective (F) as both the UNC and IGT UNC will be aligned. This in turn, equates in better settlement and efficiency of the rules of the Code.

## Impacts and Costs

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

For modification iGT0159 we confirm that we will not incur additional development or ongoing costs.

## Implementation

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

The implementation will depend in the result of the new CMS rebuild however, EAP do agree that the modification should be implemented as soon as possible following approval with the guidance of the CDSP.

## 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)*

Yes, EAP would support a reciprocal arrangement to allow the CDSP to notify an IGT where a shipper has identified an issue.

## Further Comments

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

NO

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