

Consultation Response

IGT159: Amendments to the MustRead Process

Responses invited by: 20 Sep 2022

Respondent Details

Name: Claire Louise Roberts

Organisation: ScottishPower

Support Implementation ☐

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

ScottishPower support's implementation of this modification as it seeks to address the issue of meter read submission for the MUSTRead process and align the IGT UNC with the UNC.

However as raised in the workgroup Shippers have until the 20th calendar day to procure a read once the pre notification report has been received and it would be our preference the IGT's followed the same process, as this would allow 5 days for reads to validated and rejections to worked if necessary. We appreciate this would mean changes to the UNC and system changes but wanted this noted should there be future changes.

At present there are no timescales set out in IGT UNC for an IGT to procure and submit a valid read for the purpose of Settlement. There is a risk that reads are being submitted outside of the read submission window that cannot be used, but Shipper's still incur a charge on average of £40 per read. We would like to highlight, that data retrieval processes have a 14 day turn around window to obtain a read and returned within 1 day at a fraction of the cost.

There is a concern regarding the end consumer and the length of time of taken for the read being obtained and used for billing, the customer maybe waiting for an invoice.

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 the Authority should determine if this modification should be implemented, as there is a potential materiality risk for the end consumer.

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

Insert text here

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

d) Positively

f) Positively

Impacts and Costs

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

There are no development costs anticipated as this change would be delivered through the CMS rebuild programme which Shippers are already funding.

Implementation

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

We would like to see implementation of this modification as soon as possible following an Authority decision. The implementation date would have to align with the delivery of CDSP solution within CMS.

Legal Text

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

No comment

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

Further Comments

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

Business Rule's:

1. 4. **Supplier of Last Resort (SoLR)/Change of Shipper(CoS):**
 paused for a period of 4 months, should this be extended to 7 months to allow at least two visits to the end consumer if needed i.e. issue of obtaining reads.

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