

Consultation Response

IGT159: Amendments to the Must Read Process

Responses invited by: 16th September 2022

Respondent Details

Name: Sarah Barry

Organisation: Utility Warehouse

| Support Implementation | \boxtimes |
|------------------------|-------------|
| Qualified Support | |
| Neutral | |
| Do Not Support | |

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

Utility Warehouse support implementation for the following reasons:

- Implementation will reduce the number of unnecessary site visits, reducing costs for shippers and removing the inconvenience to consumers of unnecessary site visits.

- Currently, circa 90 percent of UW meter points in the Must Read Process are IGT, AMR or Smart/DCC sites. Therefore, once these sites are excluded from the process, costs will reduce significantly as a result of fewer meter points incurring unnecessary Must Read charges.

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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 that this should be an Authority Decision Modification and should be progressed as quickly as possible.

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?

Implementation will have a positive impact on the relevant objectives, mainly objective (F), by improving alignment between the UNC and IGT-UNC.

Impacts and Costs

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

Ongoing costs would reduce following implementation.

Implementation

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

We believe this modification should be implemented 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

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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 <u>Draft Modification Report</u> for further context and information)*

It would be beneficial to add the reciprocal arrangement to improve alignment of the CDSP and the IGT data. Access to this data for the IGT will prevent an IGT carrying out a site visit where there is a known issue, improving the overall efficiency of the Must Read Process.

Further Comments

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

No

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

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