





Final Modification Report		At what stage is this document in the process?
<h1>IGT159V:</h1> <h2>Amendments to the Must Read process</h2>		<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
Purpose of Modification: To update the Must Read process to include timescales for a site to enter the process, and to introduce timeframes for procuring and returning a read that align with Central Data Service Provider (CDSP) validation criteria.		
	Panel considered IGT159V on 28 th October 2022. The Panel recommends implementation.	
	High Impact: None	
	Medium Impact: Shippers, Transports, Suppliers, UNC, CDSP, as well as positive impacts on consumers	
	Low Impact: None	

Contents

1 Summary	3
2 Governance	4
3 Why Change?	4
4 Code Specific Matters	5
5 Solution	5
6 Impacts & Other Considerations	20
7 Relevant Objectives	24
8 Implementation	25
9 Legal Text	25
10 Consultation	26
11 Recommendations	36



Any questions?

Contact:

Code Administrator



igtunc@gemserv.com



02070901044

Proposer:

Oorlagh Chapman



Oorlagh.Chapman@centrica.com



07557614769

Timetable

Modification timetable:

Initial consideration by Workgroup	10 th February 2022
Amended Modification considered by Workgroup	14 th July 2022
Workgroup Report presented to Panel	26 th August 2022
Draft Modification Report issued for consultation	26 th August 2022
Consultation Close-out for representations	19 th September 2022
Variation Request presented to Panel	28 th October 2022
Final Modification Report available for Panel	21 st October 2022
Modification Panel decision	28 th October 2022

This Modification was raised on 24th January 2022 and was presented to the Panel on 28th January 2022. The Proposer raised an Amended Modification (v2.0) on 3rd February 2022, which was considered by Workgroup on 10th February 2022. A second Amended Modification (v3.0) was raised on 21st July 2022 which was considered by the Workgroup in draft form on 14th July 2022.

On 13th October 2022 the Proposer presented a draft Variation Request to the IGT159 Workgroup. The Panel then considered and accepted the variation on 28th October 2022. The timetable above reflects the journey of this Modification since the draft Variation was presented to Workgroup.

1 Summary

What

The current Must Read process is not fit for purpose and amendments are required to address inconsistencies between codes. Currently, the Must Read process is triggered for all IGT sites where it is four months from the last valid read and for sites on Distribution Networks (DNs), the process is triggered for large supply points only (i.e. AQ >73,200 kWh).

Currently, there are no timescales for a read to be obtained and returned to the Shipper, which can result in a read not being utilised in settlement and the site not being removed from the Must Read process.

SMART and Automatic Meter Reading (AMR) meters can have an active Data Communications Company (DCC) flag but may be non-communicating and issues can take longer than four months to resolve due to the complexity of the issues that can arise. Treatment of these sites is also not consistent; following the implementation of [XRN5036 - Updates to Must Read process](#), AMR and SMART/DCC active sites are excluded from the Must Read process for DN sites.

An improvement to the process would be to utilise a site visit and for any faults or visible concerns with the meter, or any specific issues obtaining a read, are recorded and reported.

Shippers taking on new sites under Supplier of Last Resort (SoLR) arrangements may not have an opportunity to obtain actual readings for all new sites; therefore, the ability for Shippers to amend reads where sites are obtained under SoLR should be introduced.

The Must Read data provided to IGTs is currently never refreshed. This can result in a visit to a site to obtain a read for a meter that is no longer in situ, or a visit to a site where the Shipper has obtained a reading after the site entered into the process (for example by resolving the issue with a non-communicating SMART or AMR meter, or the customer has simply provided a read). These additional and unnecessary visits to a site are not only wastage but also creates a poor experience for customers and can create complaints for the Supplier.

Issues within the current Must Read process, as noted above, will be exacerbated by the implementation of Modification [UNC0692s - Automatic updates to Meter Read Frequency](#) (and [XRN4941 – Auto updates to meter read frequency](#)), which places an obligation on the CDSP to automatically update the Meter Read Frequency of a Class 3 or 4 Supply Meter Point to Monthly if certain criteria are met and is applicable to both the UNC and IGT UNC. It is expected that an additional 60,000 sites across the industry will enter the Must Read process following implementation of UNC0692s.

Why

This Modification would:

- improve settlement accuracy and Unidentified Gas (UIG);
- protect customers from additional cost and unnecessary contact associated with site visits; and
- reduce the number of customer complaints received by Suppliers.

How

This Modification seeks to introduce the following:

- Rules for IGTs to provide reads within an agreed window which allows validation of the read into Settlement;

- A specific process for SMART and AMR meters with an active DCC flag;
- A specific process for sites gained via the SoLR process to allow shippers the new shipper the opportunity to obtain a read;
- A specific process for excluding sites with known issues preventing a read from being obtained; and
- Provision of data to the Performance Assurance Committee (PAC) for oversight of sites paused from the Must Read process.

2 Governance

Justification for Authority Decision

IGT159 was originally submitted as a Self-Governance Modification Proposal. The Panel considered IGT159 at its meeting on 28th January 2022. The Proposer and Panel agreed that the Modification would have material impacts on consumers and therefore should not be Self-Governance. The Proposer agreed to submit an amended Modification Proposal.

IGT159 will therefore be progressed as an Authority Decision Modification.

Requested Next Steps

This Modification should:

- be assessed by a Workgroup.

Workgroup Comments

The Workgroup unanimously agreed that IGT159 should be an Authority decision Modification for the reasons given by the Proposer and the Panel.

Panel Comments (October 2022)

The Panel, following their acceptance of a Variation Request for IGT159, considered Governance with regards to IGT159V. The Panel unanimously agreed that IGT159V is an Authority Decision Modification for the reasons previously given on IGT159.

3 Why Change?

The current Must Read process is not fit for purpose and amendments are required to address inconsistencies between codes. Currently, the Must Read process is triggered for all IGT sites where it is four months from the last valid read and for sites on DNs, the process is triggered for large supply points only (i.e. AQ >73,200 kWh).

These issues will be exacerbated by the implementation of Modification UNC0692s (and XRN4941), which places an obligation on the CDSP to automatically update the Meter Read Frequency of a Class 3 or 4 Supply Meter Point to Monthly if certain criteria are met. It is expected that an additional 60,000 sites across the industry will enter the Must Read process following implementation.

Currently there are no timescales for a read to be obtained and returned to the Shipper, which can result in an obtained read not being utilised in settlement and the site not being removed from the Must Read process if the read fails validation.

SMART and AMR meters can have an active DCC flag but be non-communicating and issues can take longer than four months to resolve due to the complexity of the issues that can arise. Treatment of these sites needs to be consistent; following the implementation of XRN5036 AMR and SMART/DCC active sites are excluded from the Must Read process for DN sites.

Shippers taking on new sites under SoLR arrangements may not have an opportunity to obtain actual readings for all new sites; therefore, the ability for Shippers to amend reads where sites are obtained under SoLR should be introduced.

The Must Read data provided to IGTs is currently never refreshed. This can result in a visit to a site to obtain a read for a meter that is no longer in situ, or a visit to a site where the Shipper has obtained a reading after the site entered into the process (for example by resolving the issue with a non-communicating SMART or AMR meter, or the customer has simply provided a read). These additional and unnecessary visits to a site are not only wastage but also creates a poor experience for customers and can create complaints for the Supplier.

It was an original intention of this Modification to update the reporting requirements, however, there has been a data cleanse carried out as part of the CMS rebuild which would help with data quality issues. The CMS team have confirmed that the Must Read process would be improved as part of the rebuild project and refreshing current data would also be part of the requirements to be built in. Therefore, this element of the Modification has been removed.

4 Code Specific Matters

Technical Skillsets

A good understanding of meter reading processes, including how reads are obtained, validated, read and submitted. As well as an understanding of how to calculate energy consumption from meter readings.

Reference Documents

UNC TPD Section M – Supply Point Metering

5 Solution

Solution

This Modification seeks to introduce the following:

- Rules for IGTs to provide reads within an agreed window which allows validation of the read into Settlement;
- A specific process for SMART and AMR meters with an active DCC flag;
- A specific process for sites gained via the SoLR process to allow shippers the new shipper the opportunity to obtain a read;
- A specific process for excluding sites with known issues preventing a read from being obtained; and
- Provision of data to the PAC for oversight of sites paused from the Must Read process.

This Modification seeks to change the process as is in IGT UNC Part E Meter Reading.

Business Rules

1. **IGTs to provide reads (as a result of the ‘failure to obtain readings’ obligations) to the CDSP, within the standard validation window of 25 Supply Point System Business Days (SPSBDs) after the read has been obtained:**
 - IGTs cannot charge for a read that is submitted more than 25 SPSBDs after being obtained.
2. **The ability to exclude sites with a known meter issue preventing reads being obtained from the obligations under ‘failure to obtain readings’ (Must Read process):**
 - a. Ability for Xoserve to receive notifications from IGT / Shipper of a known meter issue so that sites can be excluded from the must read process.
 - Ability for Xoserve to notify Shipper where IGT notified them of known meter issue.
 - Ability for Xoserve to notify IGT where Shipper notified them of known meter issue.
 - Shipper / IGT to notify Xoserve of sites with known meter issues.
 - b. PAC to receive information on the number of sites removed from the process and how long it takes for the issue to be resolved.
3. **Exclusion of SMART, AMR and Active DCC sites from the ‘failure to obtain readings’ obligations (Must Read process). For avoidance of doubt, this change will align with the current DN treatment of SMART, AMR and Active DCC sites in relation to the ‘failure to obtain readings’ logic.**
 - a. MPRNs that meet one or more of the following conditions should be excluded from the ‘failure to obtain readings’ obligations:
 - i. have a SMART Meter associated,
 - ii. have an AMR Indicator; or
 - iii. have an active DCC flag.
 - b. For the avoidance of doubt, the above sites will continue to be included in pre-notifications to Shippers where the required Read performance has not been met, however these sites would be excluded from the Must Read generation process.
4. **Supplier of Last Resort (SoLR)/Change of Shipper(CoS):**
 - a. Where a Shipper has gained a site via the SoLR process, the timeline for the site to trigger the ‘failure to obtain readings’ logic should be paused for a period of 4 months from the point the incoming Shipper obtains the site to allow the new shipper the opportunity to obtain a read.
 - b. Where there is a CoS event, the timeline for the site to trigger the ‘failure to obtain readings’ logic should be paused for period 4 months from the point the incoming Shipper obtains the site to allow the new shipper the opportunity to obtain a read.
5. **Provision of data to PAC for oversight of sites paused from the Must Read process.**

Workgroup Comments

Consideration of current provisions

March 2022

The Proposer highlighted to the Workgroup that both the UNC and IGT UNC have a set time frame for Reads to be supplied to Shippers. IGT UNC Part E Section 11 points to Section M 5.10 of the UNC for the purpose of Must Reads. UNC Section M 5.10.6 reads as follows:

“If

- (a) before the Transporter has initiated a Meter Read pursuant to paragraph 5.10.1, the User notifies the Transporter (by Conventional Notice) that the User is taking steps to obtain a Meter Reading in respect of the relevant Supply Meter, specifying the expected date of the Meter Read;*
- (b) not later than the 10th Supply Point Systems Business Day of the following month the User provides to the Transporter a copy of the warrant (granted under the Rights of Entry (Gas and Electricity Boards) Act 1954, as amended) authorising entry to the relevant premises, or a copy of the application for such a warrant, or demonstrates to the Transporter’s reasonable satisfaction that a Meter Reading can be obtained without such a warrant; and*
- (c) a Valid Meter Reading is submitted to the Transporter in respect of the relevant Supply Meter not later than the 20th Supply Point System Business Day after the start of the following month*

Some members (Shippers and IGTs) informed the Workgroup that they were not aware of this process. There was debate as to whether this process should be clarified or if guidelines should be issued to draw attention to it, with a member suggesting that it could be captured as part of the Contact Management Service (CMS) rebuild. It was indicated by Xoserve that the CMS rebuild was replicating existing processes and those changes already made by industry.

The Workgroup discussed the meaning of UNC Section M 5.10.6 and decided that further research would be needed. It was highlighted that extending the pre-notification period could be considered in order to resolve the Must Read time constraints issues. It was agreed that the Workgroup representatives for IGTs and Shippers would:

- Investigate if UNC Section M 5.10.6 is utilised by their organisation, the frequency of it being used and the details of that process;
 - **Outcome:** Proposer advised that UNC Section M 5.10.6 was not used in their organisation as the wording was not clear enough for people to utilise. A member noted that their organisation was unsure of the process. Xoserve confirmed that this process had not been used in the last 12 months. It was noted by a further member that as the process was not clear in the UNC text there may be a need for a Modification to the UNC to address this, however this would not be included in the IGT Modification;
- Consider the definition of Section M 5.10.6 and any ideas that could be added for clarity of the Must Read process to make it more efficient;
 - **Outcome:** Workgroup representatives for IGTs and Shippers considered a definition in UNC section M 5.10.6 and any potential aspects that could be added for clarity and to make the Must Read process more efficient. The Chair suggested that a UNC Modification could be raised to address issues with the definition.

IGT Must Read submission window

March 2022

The Workgroup considered what a suitable window for Must Read submissions could be, recognising that the live Read cycle is 25 SPSBDs in total. Some IGTs thought that a 20 SPSBDs window for the Read to be submitted would be sufficient.

The Workgroup discussed the fact that IGTs have been submitting Reads directly into the CMS and that these Reads have gone straight into Settlement. The Workgroup considered whether this could lead to duplication of Reads and whether it would be unnecessary for Shippers to resubmit the same Read.

The Proposer explained that there have been many Must Read CMS rebuild workshops. The Proposer thought that the Must Read processes were defined and available and needed to be brought to the Workgroups attention. A member drew the Workgroup's attention to [Xoserve's Must Read training webpage](#) and encouraged attendees to familiarise themselves with the process, to which the Workgroup agreed. It was also agreed that further clarification from Xoserve would be needed to confirm if the timeframes for validating Meter Readings applies to all parties in the same way.

May 2022

The Workgroup reconsidered the timeframe for Read submissions and it was agreed that, to enable the read process to be completed, 20 SPSBDs would be sufficient for read submission, and this would allow five business days for the Read to be validated. Xoserve agreed that the five business days would be sufficient to carry out the necessary investigations into a Read's validity etc.

The Chair enquired as to whether there would be an Xoserve change required to make any necessary amendments to Central Systems. Xoserve advised that a change would be required as the Must Read process was done through the CMS system.

Xoserve queried as to whether there needed to be a hard rejection after 20 SPSBDs and if this was going to be a Code obligation. The Proposer confirmed that anything beyond the 20 SPSBDs should not have any applicable charges to the Shipper and that it would not be acceptable to charge someone for exceeding the 20 SPSBDs if this timescale had not been written into Code. The Chair asked if, from a systems point of view, this would diverge how large sites would be treated compared to IGT sites. Xoserve stated that currently there were differences between the scope of the two processes but that the standard validation for Reads was what was written in the UNC, and if a Read was older than 25 SPSBDs then it would not be accepted into settlement.

It was suggested that it would be useful to work through some examples of rejections as a Read could have been taken in 'good faith' but be rejected. Xoserve stated that the submitted Read would go through the standard Read validation in UK Link so there would likely be tolerance checks. They added that this Modification is not seeking to add any additional rejection codes to those existing ones, therefore it would fall under the current list of possible rejection reasons. Some members agreed that there was a data quality issue with obtaining Reads and that where a Read is submitted within 20 SPSBDs, but then rejected by a Shipper, said Shipper should still be charged for that read as it was submitted on time.

Xoserve added that if the Read had not come from a Shipper, then it would not be validated, and the same asset and tolerance checks would be applied to protect the system from an erroneous number. The

Read would have to be at least higher than the last Read and it would have to not generate a volume outside of the tolerances as per the UNC Meter Read Validation document.

June 2022

The Workgroup considered comments provided by Xoserve which questioned whether there needed to be an extra check point introduced into the process or if the validation window needed changing (to support the shift to 20 SPSBDs days from the standard 25). They advised that the current system would reject a read that is submitted 25 SPSBDs after it has been obtained and that a change to this window could be complex and would require a change to UK Link.

The Proposer highlighted experience whereby Reads were not being prevented from going into settlement after the 25 SPSBDs window had passed and felt that if a read is obtained but not submitted within the required window and/or is not valid, the customer should not have to pay for that read.

Another member highlighted that reducing the submission window may weaken the incentive for IGTs to take part in the Must Read process as there is a risk of not being able to recover costs. They added that IGTs use agents to obtain the reads, these reads are then validated by both parties prior to being manually inputted into the system so having too short a window may make participation in the process difficult.

Xoserve noted that the intention of the Must Read process is to ensure that a read is obtained when there has not been one submitted for a long period of time. The 25 SPSBDs period is an important rule and they recognised the issue with Shippers paying for a read that cannot be utilised. They advised that the Must Read process is automated in that reads come in via the CMS and are automatically passed into UK Link. Reads submitted outside the 25 SPSBDs rule are rejected. Any reads that are deemed invalid may require manual intervention where needed.

Xoserve confirmed that changes can be made to the system to accommodate the proposed window but questioned whether the validation window needed changing. The Code Administrator highlighted that two separate windows were being discussed and that this should be clarified:

- Submission Window: which the Business Rules set out as being 20 SPSBDs; and
- Validation Window: which is currently 25 SPSBDs.

The Code Administrator advised that in practice the validation window will need to include the submission window which means the validation window can either remain the same (25 SPSBDs) with a check point added at 20 SPSBDs or either the validation window or submission window are changed to align.

The Proposer advised, based on the information provided, that the submission window should be changed from 20 to 25 SPSBDs as if a read is good enough to enter into settlement the IGTs should be able to charge for the read. Other members (both Shipper and IGT) agreed with this view.

Xoserve suggested that reference be made to the standard windows set out in Code (UNC) as the validation window may differ between sites but by referencing the standard windows the rules will flex depending on the site.

July 2022

The CA highlighted an amendment to the proposed submission window, noting it had been changed from 20 SPSBDs to 25 SPSBDs to align with the current validation window. They added that this change was considered and agreed by the Proposer at the June 2022 meeting.

The Workgroup considered the change and had no further comments or points of consideration regarding the proposed submission window and were happy with the 25 SPSBDs proposed.

August 2022

The Workgroup considered the comments made in previous Workgroup meetings and confirmed that there were no further comments or points of consideration regarding this area of the solution.

Data reporting and refresh requirements¹

March 2022

The Proposer explained that the Modification seeks to implement a mechanism so that the most up to date information is provided to all the parties. It was agreed that this was an issue for both Shippers and IGTs.

Xoserve explained that this issue had been brought to their attention in the past and that a mechanism to ensure accurate data was welcomed.

May 2022

The Proposer informed the Workgroup that they had held discussions with Xoserve and Corella regarding open reporting requirements to ensure that Must Read data is regularly refreshed, and the most accurate and up-to-date information is available and used by all industry parties. They noted that this discussion included data provided to IGTs and Shippers via the CMS, including prenotification and reports that were provided to IGTs. The Proposer advised that there was a data cleanse being carried out as part of the CMS rebuild which would help with data quality issues.

The Proposer suggested that data accuracy should be a CDSP process rather than a Code obligation and the CMS team had confirmed that the Must Read process would be improved as part of the rebuild project and refreshing current data would also be part of the requirements to be built in. The Proposer asked the Workgroup if they believed that the requirement to ensure accurate data could be removed as a business rule. They added that this would be addressed in the CMS rebuild and everyone would have their working requirements via the data that would be provided in the CMS. A member agreed with this approach.

The Chair asked what the timescales would be for the CMS rebuild. Xoserve advised that some of the items were in change management stages and a first release was planned for the current quarter of 2022, however, Must Reads were not included in this release. They noted that it is likely the Must Read process would not be included until a further release in 2023. It was noted that the CMS rebuild team were going

¹ Data reporting and refresh requirements were removed following Workgroup agreement at the May 2022 meeting.

through a lot of planning activities and information would be shared with industry on the proposed release schedule for the rebuild program.

The Workgroup agreed with the removal of “Reporting requirements to ensure that data is regularly refreshed and the most accurate and up to date information is available and used by all industry Parties” Business Rules for the reasons outlined above.

Recording and reportings on visible concerns with a meter, or issues obtaining a read²

March 2022

The Proposer advised that the Meter Reading process offers a window of opportunity for faults or other read issues that may be noticed to be reported. Some IGT members notified the Workgroup that there is currently a comments field in the form which is currently used by meter readers and issues such as ‘a new meter has been fitted’ or ‘a meter has a broken screen display’ can be reported that way.

The Workgroup agreed that the information being noted by a meter reader and then later not being acted upon could have a negative impact on the consumer. The consumer will not differentiate between an IGT meter reader or Shipper meter reader and would expect that a note taken of their meter (e.g. broken display) should be acted upon by the Supplier or that the Supplier should at least have a record of it.

There was also the concern that the consumer would be less accommodating to meter readers generally if they have a Smart Meter, as they would assume that a key purpose of a Smart Meter would be that the old fashioned *knock-on-your-door* meter readings would no longer be necessary.

May 2022

The Proposer suggested that there should be some supporting documentation to the Modification as it may not be appropriate to add this section into the Modification itself. The Proposer noted that there had been further discussion with a Shipper as to whether the fault flag stopped a site from entering the Must Read process and it had also been confirmed that if they removed smart meters with sites with an active DCC flag, then the volumes would be minimal.

A member noted that an action had previously been taken to check whether fault notifications were being received and advised that they would be looking to clarify exactly what would happen to Reads with known issues and asked whether a Shipper is advised of any faults or visible concerns on the meters. A Shipper advised that they would be notified through the CMS. Xoserve added that there was a process by which they would have to suspend any forthcoming Reads with the fault flag if it had been put on the site by the Shipper. It was also suggested that a fault flag would be used primarily on larger sites or Class One sites, but this would need confirmation.

The Chair reminded parties that a guidance document sits outside of Code, whereas an Ancillary document sits under code and should be followed alongside Code obligations. Ancillary documents

² Recording and reporting concerns and/or visible meter issues requirements were removed following Workgroup agreement at the May 2022 meeting.

require a Modification to update it, however, guidance documents do not and can sometimes become outdated for this reason.

A member raised the issue of health and safety, stating that people should not be put in danger on sites that are not safe. The Proposer advised that due to data protection regulations, they would have to be careful with how information would be recorded.

A member advised that previous data issues had involved lots of Reads that could not be validated because the previous Shipper Reads were incorrect but they could still fall into the Must Read process so an IGT could be sent out to get Reads for a site that has already recorded Reads.

The Chair asked if a data cleanse would address this issue. Two Shipper members disagreed. Another Shipper member stated that if Xoserve held a rejected Read then that would mean that Reads were being obtained from that site. It was suggested that a way forward would be to change the system and raise a change to the RGMA process. The Workgroup agreed with this approach. The Chair suggested that this topic would potentially involve a Review Group being raised in the UNC and would be out of scope for this Modification.

Exclusion of sites with known issues which prevent Reads from being obtained³

June 2022

The Workgroup first considered the exclusion of sites with known issues preventing Reads at their June 2022 meeting.

Xoserve questioned whether it was necessary to have a fault flag process incorporated into the solution and/or legal text as this is something that should be addressed at solution level rather than through Code obligations. They suggested as part of their review of the Business Rules that fault flag should be removed to make it more generic and set out what sites can be excluded. This is because how the exclusion happens in the system will be determined as part of the system change development.

The Workgroup discussed and considered a variety of reasons why a Smart Meter may not be communicating, and it was recognised that there are many reasons, and they vary in terms of how long it takes and how much effort is required to address the issues.

The Chair asked, if the customer obtains readings will such readings suffice, meaning a Must Read does not have to be obtained. A Shipper member confirmed this was indeed the case, noting that where a meter is not communicating a customer may have to submit a read every month for it to read at the required frequency.

The Chair advised that, at their June meeting, the PAC discussed problems with non-communicating Smart Meters raised by Shipper. PAC's focus is to understand the seriousness and the validity of the meter issues being experienced. PAC are concerned with the effort that is being made to remedy the issues and using the fault flag system has a purpose, but it does not offer a solution. They added that

³ This matter was first considered at the June 2022 Workgroup meeting.

there are instances where there are readings being obtained but they cannot be used for settlement for various reasons. PAC are in discussion with the REC Code Administrator and the Data Communications Company (DCC) to identify if there are known issues.

The Chair highlighted that the use of fault flags for Must Reads would be of interest to the PAC. The PAC would be particularly interested in sites that have been out of the Must Read process for a long time and what is being done to resolve any issue(s). A Shipper member added that having a site removed from the Must Read process does not remove a parties obligation to collect Meter Readings. If a shipper has a high number of sites that are not getting Reads generally than that should be picked up. The Chair advised that Reads are being obtained but they are not getting into settlement.

The Workgroup agreed that the Business Rules and the legal text should remain brief with regards to the ability to exclude sites with a known and identified meter issue. It was agreed that references to a fault flag be removed from the Business Rules as this is a solution level matter rather than a Code obligation.

July 2022

The CA advised the Workgroup that the Proposer had removed some of the lower level detail from this Business Rule and that only the provision of data to PAC remained.

A member asked whether the Workgroup had determined how Xoserve will notify parties of a site being excluded from the Must Read process. It was confirmed that any sites that require exclusion from the Must Read process due to a fault should be removed from the notifications report. Xoserve advised that this part of the solution will require system changes and the “how” from a system perspective is to be determined but it is expected to require reporting changes.

The Workgroup discussed how the solution may work in practice and who will need to notify Xoserve when a site needs to be excluded. It was recognised that both a Shipper and an IGT could identify an issue which could prevent a read from being obtained. It was agreed that Xoserve needs to be able to receive notifications from both the IGT and the Shipper and they need to be able to then remove a site from the pre-notifications report. It was also recognised that where an IGT notifies Xoserve of a meter issue that there needs to be a mechanism for Xoserve to notify the Shipper of the issue as well. The Proposer agreed to make some amendments to the Business Rule to ensure the above is captured appropriately.

A member asked whether there was any issue with an IGTs ability to charge for a Read. For example, if there is no known meter issue at the point at which a Read is required and when obtaining the Read the IGT observes an issue preventing the Read from being obtained, is there an issue with the IGT still charging for the attempted read. Some IGT members in attendance confirmed that in this scenario they would charge for the attempted Read but would notify the CDSP / Shipper of the issue on site and then not go out for a Read again. The Workgroup raised no issue with the current approach.

August 2022

The Workgroup considered the comments made in previous Workgroup meetings and confirmed that there were no further comments or points of consideration regarding this area of the solution.

Smart and AMR meters with an active DCC flag

March 2022

The Proposer explained to the Workgroup that the Modification aims to have a specific process for SMART and AMR meters to address an active DCC flag that is not communicated, leading to issues taking a few months to resolve. It was agreed that additional and unnecessary site visits are inefficient and can also create a poor experience for consumers. Xoserve explained that they are aware of this and are willing to work with industry in order to implement a process that is effective.

Xoserve do currently act upon meters that are not in use for Distribution Networks (DNs) but do not have a process to address meters with a fault.

May 2022

A question was raised regarding why sites were in the Must Read process if they had a valid active DCC flag. A Shipper stated that for SMETS to be remotely triaged, the active DCC flag would have to stay in place. For a non-domestic site, it would need to be remotely fixed, and the active flag would need to be left in place, meaning there could be a non-domestic site that shows as active but was in fact inactive. Once taken out of the active flag, it would not be possible to remotely triage and it would go back to a more manual process.

The Proposer noted that they received information on customer dissatisfaction when meters had not communicated as the meters should provide Reads for them. It was advised that they would get notified through the DCC when Reads were not being obtained and that this is when the remote triage process would begin.

A concern was raised regarding Unidentified Gas (UIG), stating that there was potential for sites that had a Smart DCC flag on them, to be left and not fixed if taken out of the Must Read process. It was considered what the trigger would be to addressing non-communicating Smart Meters in the Modification.

June 2022

Xoserve highlighted to the Workgroup that the UNC does not specify Smart Meters, AMR meters or active DCC sites and questioned whether this should be removed, noting that the UNC leaves what can be in scope of the Must Read process to DN's discretion. They added that the exclusion of these sites would be achieved via a Data Services Contract (DSC) change rather than a Modification.

Proposer expressed their desire to keep this in the solution as this Modification is looking at IGT Must Reads, not UNC DN Must Reads and asked for Workgroup views on keeping this in. A Shipper asked whether the list of excluded Smart meter mechanism codes was exhaustive or would potentially need adding to in future. The Code Administrator suggested referencing "Smart Meters" rather than listing meter mechanism codes as the Smart Meter definition was quite broad and would allow for all current and future Smart Meters to be included.

The Chair noted that Smart Meters will likely be defined under the system in a specific way and that if we stipulate Smart Meters the system definition should be able to allow for this. The Chair asked if the exclusions were kept in the Modification if this would differ the system for IGT sites compared to DC sites. Xoserve advised that having excluded sites would bring things more in line as the DN's have exclusions for sites with site meters, with the majority of the smaller end of the market excluded. The Larger sites typically qualify for Must Reads. This would bring the process for IGT sites more in line with the DN approach.

The Code Administrator noted that we do not Define DCC or DCC flag in the IGT UNC so we would need to think about how we would look to include that. The Chair asked what the difference was between a site with a Smart Meter and a site with an active DCC Flag. Members confirmed that you can have a Smart meter without an active flag.

A question was raised as to whether you need to exclude both a site with a Smart Meter and a site with an active DCC flag or whether this needs to be “or” rather than “and”. The Workgroup agreed that more thought was required with regards to this, with a member highlighting that [UNC0692S Automatic updates to Meter Read Frequency](#) defined active DCC flag and suggested that this be reviewed.

July 2022

The CA highlighted changes to the list of excluded sites noting that rather than setting out the individual meter mechanism codes for SMART Meters the term “SMART Meter” was used instead as this was considered at the June 2022 meeting to be more future proof.

The CA reminded the Workgroup about the discussion at the last meeting regarding whether “active DCC flag” was necessary and how IGT159 aligned with UNC0692S. The CA advised the Workgroup of the use of DCC flag, definition of a SMART Meter and what sites are excluded under what circumstances in UNC0692s.

A member confirmed that you can get sites that are showing with an active DCC flag but are not communicating, adding that the flag needs to stay active for the fault to be fixed. Another member advised that it may not be a metering issue but could be a signalling issue. The Workgroup considered some scenarios to help it understand the point at which a site could be excluded and ultimately agreed that you need both the active DCC flag and the SMART Meter exclusion criteria as you can have SMART Meters that do not have an active DCC flag and vice versa.

A member queried the definition of a SMART Meter, the CA highlighted the current IGT UNC definition to the Workgroup, as follows:

A Smart Meter means:

- (a) an energy meter that can both send and receive information using an external electronic communications network; or*
- (b) an energy meter and a device which is associated with or ancillary to that meter and which enables information to be sent and received by the meter using an external electronic communications network;*

and the expression “Smart Metering” is to be read accordingly.

The CA advised that this should align with the what the central systems define a SMART Meter to be. Xoserve advised that it would be a good idea to align the exclusions and criteria with UNC0692S. This will allow Reads are treated the same way in the system. They added that leaving the definition high level but setting out the detail of how the processes may work in the Modification, provides necessary flexibility for technical solution development. The CA confirmed that this is the current approach and there were no objecting views from the Workgroup.

August 2022

The Workgroup considered comments made in previous Workgroup meetings and noted that it was possible for a meter to have an active DCC flag but not be recorded as a SMART Meter and for this reason it was agreed that these meters should be excluded from the Must-Read requirements.

The Workgroup had a discussion regarding the defined exclusions around remotely read and Smart meters and agreed that they wanted the exclusion circumstances defined. It was agreed that the technical solution developed for the required system changes should define the exclusions from a systems perspective.

The Workgroup confirmed that there were no further comments or points of consideration regarding this area of the solution.

SoLR and COS gained sites

March 2022

The Proposer explained that the Modification aims to have a specific process for sites gained via the SoLR process to allow the new Shipper the opportunity to obtain a Read. The Proposer added that new Shippers can currently obtain a Read but the process is not clarified and could lead to duplicate reading. It was highlighted that the information held for a SoLR would need to be kept up to date and this may need further thought.

May 2022

The Proposer advised that there needed to be a specific process for sites gained via the SoLR and CoS processes and that the Modification proposes a 4 month pause on all sites that enter these processes. A member challenged whether a 4 month window for a CoS was necessary and advised that more detail might be needed. The Proposer agreed to revise the wording.

Xoserve asked what would happen to the Must-Read process once Faster Switching had been implemented as technically a customer would be able to switch as often as they wanted. They noted that if an account was taken over from and they only had five days to submit the Read then they potentially would not have time to bill for it and this could lead to customers switching more frequently to avoid paying their bills. A Shipper member suggested that if the Reads weren't being received then the issue should ultimately be taken to PAC.

It was suggested that the Business Rule specify that after 4 months, the timescales should return to zero and that this would allow a new Shipper the full amount of time to obtain a Read. The Proposer agreed with approach and advised that further information as needed to determine if there would be any mitigations in place for customers switching.

June 2022

The Workgroup were taken through Xoserve's suggested wording regarding the length of pause from the Must Read process for sites gained via SoLR and CoS. The Proposer confirm that the 4 month period suggested by Xoserve had been accepted and the Workgroup agreed that this was sensible.

The Workgroup also considered other comments from Xoserve regarding wording in the Business Rule. Xoserve confirmed that there are two notification related reports:

- Pre-notification reports set out sites that will enter the Must Read process if no action is taken within a certain period of time; and
- Notification reports set out sites that have entered the Must Read process.

Xoserve suggested that that the Business Rule be amended to clarify that sites paused from the Must Read process as a result of SoLR or CoS should remain in the “pre-notification” reports rather than “notification” as currently stipulated. The Proposer agreed with this amendment.

A question was raised regarding how parties and the system would identify a site that needed to be paused from the Must Read process as a result of SoLR and CoS. A member advised that a pause is possible now and is being done at the moment for sites being moved from one class to another as a result of UNC0692s. Xoserve confirmed that an enduring solution will be needed to allow SoLR and CoS related pauses to be identified and dealt with on an enduring basis.

A question was raised regarding whether an IGT will be informed of a SoLR / CoS or if the IGT will be expected to identify this. Some IGT members advised that this comes down to how often data is refreshed in the CMS and that when a site goes into a SoLR / CoS they will not be able to pick this up based on the files provided as the action for a Must Read being obtained will have already been submitted. IGTs are reliant on Xoserve keeping the data clean.

The Workgroup considered the impact of different scenarios. Xoserve confirmed that for a CoS event, the Shipper that is registered when the site enters the Must Read process will continue to be accountable and chargeable. For a SoLR event however it may be difficult to charge. The Workgroup agreed that there may be further work required with regards to SoLR events.

July 2022

The CA reminded the Workgroup of the purpose of this Business Rule. They noted that the ability to identify these sites was something that needed a technical solution developed. Xoserve confirmed that there are no rules for SoLR or CoS sites so from a CDSP requirement perspective they need to have the ability to identify the sites and pause the sites from the process.

The CA asked Xoserve whether the Business Rule was at the right level to facilitate a ROM. Xoserve advised that they believe they already get notifications and will therefore already know about a CoS and a SoLR. It is more about them knowing, and having the ability, to pause these sites from the process. However, the detail and the exact solution will be determined.

August 2022

The Workgroup considered the comments made in previous Workgroup meetings and confirmed that there were no further comments or points of consideration regarding this area of the solution.

Sites out of the Must Read process for more than 12 months⁴

⁴ This Business Rule area was considered for the first time at the June 2022 Workgroup meeting. The Proposer chose to remove this from the Modification following the June 2022 meeting.

June 2022

The Workgroup considered comments from Xoserve regarding the 12 month period in the Business Rule (which looked to ensure that sits out of the Must Read process were put back into it after 12 months). They highlighted that there is currently a 24 month Must Read trigger for annually read sites. They were concerned that this 12 month period could override the 24 months in Code.

The Code Administrator noted that there is currently no limit on the number of times a site can be paused so there is potential for a site to go back into the Must Read process at the 12 month mark and immediately be paused again. They also noted that it may be worth clarifying whether the 12 month period is in total or consecutive.

There was discussion with the Proposer and the Workgroup with regards to the intent of the Business Rule. A member advised that the reason behind the Business Rule was to ensure that sites are not paused indefinitely. The Workgroup agreed that further consideration and clarification was needed with regards to this Business Rule.

Provision of data to the PAC for oversight of sites paused from the Must Read process⁵

July 2022

The CA advised the Workgroup that the Proposer had removed the Business Rule that looked to put sites that had been out of the Must Read process for more than 12 months back into the process. It was felt that this was going to be too difficult to develop as part of this Modification. The CA advised that a new Business Rule had been added that looked to ensure that data was provided to the PAC with regards to sites paused from the Must Read process to ensure that there is oversight.

The CA advised that there was still a question with regards to whether the data already being provided through Performance Assurance Reports Register (PARR) Reports would cover Must Reads. The Chair confirmed that there is nothing that is currently received that is Must Read process specific and that if we wanted the PAC to see if there was a Shipper continuing to pause sites we would need to include the PARR Report in the Modification. The PAC can currently see the time between reads being taken so they can see if its been a significant amount of time since a read has been taken.

Xoserve confirmed that a new PARR Report will be needed and suggested that said report set out the volume of IGT sites excluded from the Must Read process as a result of a “known meter issue” being identified and the amount of time the sites are excluded for. They also felt that the report also needed to include the volume of sites paused due to a CoS and SoLR event and how long the sites are paused for.

The CA asked for confirmation on how the provision of data required for Must Reads in a PARR Report is best reflected. The Chair confirmed that if a PARR Report is needed as part of the Modification, it should be delivered as part of the Modification’s solution. They added that the Code should indicate that the PAC should have oversight of the process, or aspects of it, and set out an intent for a report rather than setting

⁵ This Business Rule was considered for the first time at the July 2022 Workgroup Meeting.

out exactly what it should contain. It was recognised that this approach this would allow more flexibility to develop the most appropriate PARR Report.

August 2022

The Workgroup considered the comments made at previous Workgroup meetings and it was agreed that the implementation of approved Modifications UNC0674V and IGT138V will allow PAC to see any information they reasonably need, in order to consider any performance issues related to Must Reads. It was also agreed that information regarding sites that are paused from the Must Read process should be provided to PAC for visibility and their consideration. There were no further comments raised with regards to this area of the solution.

For the avoidance of doubt, the content of any report to PAC will be considered during the development of the technical solution.

Consideration of Draft Variation

Workgroup Comments (October 2022)

The Workgroup were given an update on the progression of IGT159, as well as an overview of comments received by the Panel prior to consultation. They were advised that the Panel added an additional area of consideration as part of the consultation. As a result, the Proposer intended to present a Variation Request to the Panel at its October 2022 meeting.

The Workgroup were reminded that the Modification allowed for sites with known issues to be excluded from the “Must Read” process under IGT159. It was also noted that the Modification currently stipulates that when an IGT notifies the CDSP of a known issue, the CDSP must notify the Shipper. However, there is no reciprocal provision for the CDSP to inform the IGTs of known issues. The Workgroup were advised that the intention was always for IGTs to be notified but the Workgroup agreed that this could be achieved by removing the site from the notification report.

The Workgroup were advised that the draft Variation would have no impact on the Rough Order of Magnitude (ROM) provided by Xoserve and that the intention in the requirements for the ROM was for IGTs to be notified.

The Workgroup were advised that there were nine consultation responses received for IGT159 and of those 7 agreed that a reciprocal provision should be added into the Modification and the Legal Drafting.

The Workgroup considered the draft Variation, consultation responses (only with regards to the reciprocal provision) and the changes to the Legal Drafting and unanimously agreed that the changes themselves were minimal and were not a significant material change to the solution. They also agreed that while the changes were minimal, the positive impact they would have would be significant.

The Workgroup unanimously agreed that the changes to the Modification and the Legal Drafting should be made, noting that the changes would provide clarity with regards to governance.

Panel Comments (October 2022)

Consideration of Variation Request

The Panel were presented with a [Variation Request](#) for IGT159 on 28th October 2022. The Panel were taken through the reasons for the request, as well as relevant responses to the IGT159 consultation.

The Panel were advised that the Proposer, following consideration of respondents views to the Consultation, felt that a change to the Modification was needed to ensure the governance was clearer with regards to the CDSP notifying IGTs of known issues. The Panel were advised that the Workgroup considered the Variation Request as well as relevant consultation responses on 13th October and unanimously agreed that a Variation was needed and that they would support the progression of one.

The Panel reviewed the changes to the Modification as well as the Legal Drafting and agreed that these were minimal and clear. They also considered whether the changes to the Modification were material or non-material. The Panel unanimously agreed with the Workgroup that the changes to the Modification were non-material.

The Panel unanimously accepted the Variation Request and as a result, IGT159 was withdrawn and replaced with IGT159V.

Consideration of Solution

The Panel unanimously agreed that the IGT159V solution delivers the intention of the Modification and that no further work was required.

6 Impacts & Other Considerations

Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No

Consumer Impacts

What is the current consumer experience?

It is currently a poor consumer experience as additional site visits, for example, are causing additional contact and increased costs for consumers. Where a meter is SMART there is a consumer understanding that the meter should be read automatically and therefore the customer may wonder why they are getting site visits. The cost of living crisis means consumers are willing to provide their own reading for more accurate billing so the level of understanding and engagement parties are seeing is increasing.

What would the new consumer experience be?

This Modification would improve the customer experience as the information collected would be accurate and up to date, which would reduce the need for additional site visits. More accurate settlements could result in reduced costs which may impact bills as customers will be charged for reads that can be validated and used for settlement.

Other improvements to consumer experience include:

- Customers potentially experiencing less visits which helps with improved safety, reducing the fear of bogus callers and doorstep crime;
- More joined up working with the Shippers, IGTs and Xoserve; and
- Improved forecasting which could equate to lower bills.

Impact of the change on Consumer Benefit Areas

Area	Identified Impact
<p>Improved safety and reliability</p> <p><i>Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?</i></p> <p><i>This area would relate to changes which balance the system safely, securely and at optimum cost, particularly for consumers in vulnerable situations. It would also consider changes which introduce flexibility across the market to flow energy at the most efficient profile, lower operational costs and make sure GB consumers can access the cheapest sources of energy.</i></p>	Neutral
<p>Lower bills than would otherwise be the case</p> <p><i>Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?</i></p> <p><i>This area would relate to changes that are likely to benefit end consumers. This could include any change where it has been demonstrated that it could lower bills for end consumers.</i></p> <p><i>If possible, this section should include any quantifiable benefits.</i></p>	Positive
<p>Reduced environmental damage</p> <p><i>Will this proposal support:</i></p> <ul style="list-style-type: none"> <i>new providers and technologies?</i> <i>a move to hydrogen or lower greenhouse gases?</i> <i>the journey toward statutory net-zero targets?</i> <i>decarbonisation?</i> <p><i>This area would relate to changes which demonstrate innovative work to design solutions which ensure the system can operate in an environmentally sustainable way both now and in the future.</i></p>	Positive
<p>Improved quality of service</p> <p><i>This area would focus on demonstrating why and how the change can improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient and effective.</i></p>	Positive
<p>Benefits for society as a whole</p> <p><i>This area would relate to any other identified changes to society, such as jobs or the economy.</i></p>	None

Cross-Code Impacts

This Modification is likely to have an impact on the UNC, specifically Section M – Supply Point Metering. This Modification may also impact Settlement Accuracy, the Retail Energy Code (REC) and the Smart Energy Code (SEC).

The SEC and REC are not expected to be directly impacted at a Code level by IGT159. However, the two Codes have been highlighted within this section to recognise the indirect interactions that this Modification may have (e.g., the exclusion of SMART meters and meters with an active DCC flag (SEC)).

UNC	<input checked="" type="checkbox"/>
REC	<input checked="" type="checkbox"/>
SEC	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>
None	<input type="checkbox"/>

Environmental Impacts

None cited by the Proposer.

The Workgroup believe that there will be a positive impact on the environment because of less vehicle emissions due to the reduction in unnecessary site visits.

Central System Impacts

CDSP systems will need to be changed to introduce an enhancement to UK Link, which is required to enable the upload of Must Reads manually. A framework is also needed to identify SoLR sites and to exclude them from the Must Read process. Further, a PAC update report will be required to provide the number of sites removed from the process and how long it will take for meter issues to be resolved.

Enhancements will also be required to the CMS system to support the communication, identification and exclusion of sites with known meter issues.

Further information regarding Central System impacts can be found in the ROM provided by Xoserve, which has been published on the IGT159 webpage [here](#).

Rough Order of Magnitude (ROM)

The estimated cost of the CDSP system changes detailed above is as follows for the two implementation options set out in the ROM:

- **Option 1:** between £15k and £50k
 - Required changes implemented in UK Link with the CMS element delivered as part of / following the CMS Rebuild (both elements delivered at the same time).
- **Option 2:** between £30k and £70k
 - Required changes implemented in UK Link and the current CMS (subsequent delivery within the new CMS will be required).

Further information on the above options can be found in the ROM provided by Xoserve, which has been published on the IGT159 webpage [here](#).

Workgroup Impact Assessment

Impacts

The Workgroup considered the potential impacts of IGT159 and agreed with these as set out above. They added that this Modification could have a positive impact on the environment as a result of less vehicle emissions due to the reduction in unnecessary site visits. They also believed that this Modification would add efficiency within the IGT UNC and will mirror what is currently within the UNC in terms of Reads being obtained within 25 SPBDS. This in turn would allow for Shippers to enter more timely/usable Reads into Settlement.

The Workgroup concluded that they had no further comments with regards to impacts and that those impacts identified above are accurate.

ROM & System Impacts

The Workgroup considered the ROM in detail, which has been published on the IGT159 webpage, [here](#). The Workgroup recognised that the ROM provided a high level overview of the changes required and that the detailed design will be developed as part of a DSC Change. It was also recognised that the Change Management Committee will make the final decision in terms of the detail design and implementation approach.

The Workgroup reviewed Xoserve's requirements summary and agreed that it was accurate as documented in the ROM. They considered the impacts of the required changes, as set out in the ROM. The Workgroup noted that the impact on Shippers and IGTs is expected to be low with Xoserve welcoming views and engagement as part of the development of the technical solution.

The Workgroup considered the potential monetary savings made by the proposed system changes, recognising that there would be a reduction in wasted site visits (at approximately £40). The Workgroup estimated that reducing the number of visits by between 400 – 1000 could have savings of up to £50k.

The Workgroup also discussed and considered both implementation options. Views on implementation can be found in Section 8 of this document.

The Workgroup had no further comments or concerns regarding the ROM.

Panel Comments (October 2022)

The Panel considered the impacts of IGT159V, as well as consultation respondents views with regards to impacts.

The Panel recognised that while this Modification goes some way to addressing some of the bigger issues with the Must Reads process, the Panel noted that there are wider issues that sit outside of this Modification. The Panel encourage parties who have not been engaged with IGT159V or the CMS rebuild to get involved with discussions as some of the issues regarding the Must Reads process are being addressed as part of the CMS Rebuild (e.g. data cleansing).

The Panel noted a response to the IGT159 consultation whereby the respondent referenced challenges with regards to cost recovery. The Panel felt that challenges with cost recovery is associated with the existing limitations within the current Must Reads process as there will always be a gap where the status of a site can change as the notification reports are based on monthly data rather than real time data.

The Panel agreed that the impacts highlighted above are accurate and applicable to IGT159V and had nothing new to add.

7 Relevant Objectives

Impact of the Modification on the Relevant Objectives:

Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	None
(B) Co-ordinated, efficient and economic operation of (i) the combined pipe-line system; and/or (ii) the pipe-line system of one or more other relevant gas transporters	None
(C) Efficient discharge of the licensee's obligations	None
(D) Securing of effective competition: (i) between relevant Shippers; (ii) between relevant Suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant Shippers	Positive
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	Positive
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

Proposer's Views

(D) Securing of effective competition: Accurate Must Read information and updated time frames will promote higher rates of meter read submission and more accurate AQs. Thus, more accurate gas allocation and reconciliation, which will promote competition by reducing a barrier to entry that is currently being created by the high and unexplained levels of UIG.

(F) Promotion of efficiency in the implementation and administration of the Code: as both the UNC and IGT UNC will be aligned. It should also equate in better settlement and efficiency of the rules of the Code.

Workgroup Comments (August 2022)

The Workgroup considered the views of the Proposer and the solution in its final form and agreed that this Modification has a positive impact on Relevant Objectives (D) and (F) for the reasons provided above.

Panel Comments (October 2022)

The Panel considered the impact of IGT159V on Relevant Objectives. The Panel agreed that IGT159V will have a positive impact on Objectives (D) and (F) for the reasons given above.

8 Implementation

As soon as possible following an Authority decision to approve and in alignment with the delivery and go-live of the CDSP solution.

Workgroup Comments

When considering the two implementation Options set out in the ROM the Workgroup preferred Option 1, noting that it is dependent on the success of the CMS delivery. The Workgroup noted that the estimated delivery timeframe for Option 1⁶, which would be part of an ad-hoc release, is June – September 2023.

The Workgroup agreed that Option 2⁷, which would need to be delivered as part of a major release, should be considered if Option 1 is going to be delayed for a considerable period. The Workgroup would like IGT159 to be implemented in 2023 (if not sooner).

The Workgroup have set the implementation approach above to ensure that the Modification is implemented as soon as possible following approval, but it is also implemented in line with what is agreed as part of the delivery and go-live of the CDSP solution.

Panel Comments (October 2022)

The Panel considered the implementation approach as set out above and unanimously agreed with the approach for IGT159V.

9 Legal Text

Text Commentary

Legal Text was developed as part of the assessment of the Modification and can be found on the IGT159 webpage [here](#).

Workgroup Comments

The Workgroup considered the legal text and agreed that it delivers the intention of the IGT159 solution.

Panel Comments (August 2022)

The Panel discussed the Legal text and the following observation was made:

- Section E, paragraph 11.1

⁶ Option 1: Required changes implemented in UK Link with the CMS element delivered as part of / following the CMS Rebuild (both elements delivered at the same time).

⁷ Option 2: Required changes implemented in UK Link and the current CMS (subsequent delivery within the new CMS will be required)

- It was highlighted that the context that currently sits in the UNC and leads to points (a) and (b) currently within 5.10.3 has not been included within the drafting and therefore there is a risk of said context being fully replaced and therefore lost. The Code Administrator acknowledged the point and advised that the legal drafting would be updated to ensure the relevant UNC context is not lost.
- It was highlighted that the use of “replaced” within the legal drafting was not entirely clear. The Code Administrator clarified that the use of “replaced” was to indicate to the reader that provisions within the UNC legal text would be replaced by provisions provided in the IGT159 legal text (i.e. they are different to provisions currently within the UNC). The Code Administrator has amended the Legal Drafting to make this clearer.

It should be noted that there were also views expressed about clause 11.5 in the IGT159 legal drafting and whether there should also be a reciprocal requirement for the CDSP to inform Pipeline Operators if informed of meter issues by Pipeline Users.

However, it was agreed that changes cannot be made at this time, as it was felt the legal drafting was reflective of the solution and Business Rules and that industry should be consulted on regarding the value of this addition. Details regarding this discussion can be found in Section 10 of this document.

Panel Comments (October 2022)

The Panel considered the IGT159V Legal Drafting and unanimously agreed that the Legal Drafting delivers the intent of the IGT159V solution.

10 Consultation

Panel invited representations from interested parties by 20th September 2022. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Representations were received from the following parties:			
Organisation	Response	Relevant Objectives	Key Points
Last Mile Asset Management	Qualified Support	D - positive F - positive (subject to changes)	<ul style="list-style-type: none"> • Broadly supportive of the intent of the change proposal on the basis it provides a more defined set of rules around the collection and provision of must reads. They have concerns around the drafting where there is a gap regarding the provision of information to IGTs which would leave IGTs exposed to unrecoverable costs. • Agree the Modification is not Self-Governance. • Believe that there is a gap in the legal drafting whereby though Shippers are able to notify the CDSP of meters which should be excluded from the must read process, there is no obligation on the CDSP to notify IGTs of these changes. Without this obligation, the IGTs will

			<p>receive inaccurate notifications of which meters require a must read, which under the current proposed drafting, would result in IGTs not being able to recover their costs for the provision of associated reads.</p> <ul style="list-style-type: none"> • Agree that this Modification will have a positive impact on Relevant Objectives (D) and (F). • Implementation lead time should be linked to the implementation any Xoserve changes to provide IGTs with amended must read reports. • Not fully supportive of Legal Text for reasons noted above. • Agree that a reciprocal arrangement should 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. • Further Comments: Qualified support is provided on the basis that the following amendments are made to the Modification: <ol style="list-style-type: none"> 1) Legal Text requires the CDSP to inform IGTs of sites removed under the new criteria; and 2) On basis 1) is addressed the implementation is aligned to the date that the CDSP can deliver the changes. <p>Without these changes we will be unable to support the modification. Alternatively, the proposer may wish to consider removing the criteria which would require the CDSP to make reporting changes and simply include the revised timeframes for IGTs to provide must reads.</p>
Utility Warehouse	Support	F - Positive	<ul style="list-style-type: none"> • Support implementation for the following reasons: <p>Implementation will reduce the number of unnecessary sit visits, reducing costs for Shippers and removing the inconvenience to consumers of unnecessary site visits.</p> <p>Currently, circa 90% 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.</p> • Agree it should be an Authority Decision Modification and should be progressed as quickly as possible. • Agree that this Modification will have a positive impact

			<p>on Relevant Objective (F).</p> <ul style="list-style-type: none"> • Ongoing costs would reduce following implementation. • Believe the Modification should be implemented as soon as possible. • Agree that the Legal Text will deliver the intent of the Modification. • Believe 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.
EDF	Support	D - positive F - positive	<ul style="list-style-type: none"> • Welcomes this Modification as it seeks to define clear processes for managing the must-read process, especially the edge cases where the shipper is unable to ascertain must reads. • Agrees that this Modification should be treated as an Authority Decision Modification. • Agree that this Modification will have a positive impact on Relevant Objectives (D) and (F). • Note that this Modification is currently being impact assessed. • Request a 6-9 month implementation lead time to allow for system and process changes. • Agree that Legal Text delivers the intention of the Modification. • No views with regards to the introduction of reciprocal arrangements for the CDSP to notify an IGT where a Shipper has identified a known issue.
BUUK	Qualified Support	D - negative F - negative	<ul style="list-style-type: none"> • Qualified support is given on the basis that the Legal Text is amended to include the notification from the CDSP to the IGT when a Shipper has notified the CDSP of a known meter issue. • The Modification would have material impacts on consumers and they therefore agree that this should be an Authority Decision Modification. • Without the amended legal text, we disagree that the Relevant Objectives D and F are fully achieved. The process is further complicated and made inefficient where the Pipeline User attends site to obtain a meter read and be unable to charge for that visit because

			<p>they have not been advised of the existing meter issue. The customer is further inconvenienced by this additional and needless visit.</p> <ul style="list-style-type: none"> • Should the amendment to the Legal Text be made, and the Modification approved, there will be additional costs to IGTs which are unclear at this stage due to the change and funding process by the CDSP. • If the legal text is amended, we agree that the mod should be implemented as soon as possible following an Authority decision to approve and in alignment with the delivery and go live of the CDSP solution. However, when considering the two implementation Options set out in the ROM the preferred Option 1, is dependent on the success of the CMS delivery. • Do not feel the Legal Text delivers the intent of the Modification as that there are no governance arrangements to support what the solution looks to achieve. • Would support the Modification if changes to the Legal Text are made but if not are unable to support.
Centrica	Support	D - positive F - positive	<ul style="list-style-type: none"> • The current Must Read process is not fit for purpose; This Modification would improve the customer experience as the information collected would be accurate and up to date, which would reduce the need for additional site visits and reduce costs for consumers. The Modification requires IGTs to provide reads within an agreed window which will allow the read to be utilised for Settlement. This Modification will allow for Shippers to enter more timely/usable Reads into Settlement. The CDSP will remove a site from the final notification report once advised of known issues, and I believe the legal text aligns to, and delivers, the intent of the solution and the Business Rules. • Agreed that this Modification is an Authority Decision Modification. • Agree that this Modification will have a positive impact on Relevant Objectives (D) and (F). • Indicated that costs and impacts are to be determined. • Believes that this Modification should be implemented as soon as possible. • Agreed that the Legal Text delivers the intention of the Modification. • Agreed that reciprocal provisions should be added to

			the Legal Drafting to ensure the CDSP notify an IGT where a Shipper has notified of a known issue.
E.ON	Support	D - positive F - positive	<ul style="list-style-type: none"> • 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 • Agree that the Modification is an Authority Decision Modification. • Agree that this Modification will have a positive impact on Relevant Objectives (D) and (F). • Do not believe there will be any development or additional costs for their organisation other than contributing to the costs associated with the CDSP processes. • Believe that this Modification should be implemented as soon as possible. • Agree that the Legal Text delivers the intention of the Modification. • Would support the reciprocal provisions that ensure the CDSP notify the IGT when a Shipper notify of a known issue should the changes not delay the delivery of IGT159.
Energy Asset Pipelines	Support	D - positive F - positive	<ul style="list-style-type: none"> • 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. • Agree that this Modification is an Authority Decision Modification. • Agree that this Modification will have a positive impact

			<p>on Relevant Objectives (D) and (F).</p> <ul style="list-style-type: none"> • Confirmed that they are not expected to incur additional costs or impacts. • Believe that implementation will depend in the result of the new CMS rebuild however, they agree that the Modification should be implemented as soon as possible following approval with the guidance of the CDSP. • Agree that the Legal Text delivers the intent of the Modification. • Support the reciprocal arrangement to allow the CDSP to notify an IGT where a shipper has identified an issue.
Indigo Pipelines Limited	Support	F - positive	<ul style="list-style-type: none"> • Generally supportive of the desire to streamline the Must Read process. Specifically, they would like to see the IGT Must Read 'pot' being regularly refreshed by CDSP. They support excluding AMR and SMART/DCC Active sites, in alignment with the UNC process for Large Transporter sites. They agree that for sites gained via the SOLR process, Shippers should be given extra time to obtain a meter reading. They also support the temporary exclusion of sites with known issues that prevent a meter reading being obtained, with oversight from PAC of these 'paused' sites to ensure the issues are resolved in a timely manner. • Agree that this Modification is an Authority Decision Modification. • <u>New/Additional Issue</u>: Cited that the proposal states that site visit information, relating to a fault with or concerns about the meter, should be recorded and reported. Consideration should also be given to reporting on readings obtained by the IGT but rejected by CDSP. Recent analysis of CDSP rejection of Indigo Pipelines Must Reads has shown that 50% of rejected reads are from properties that have been visited 2 or more times in the past 12 months for the purpose of obtaining a Must Reads. The readings obtained each time are sequential and appear to validate each other as correct. These readings are not currently being passed to the Shipper to enable them to investigate and update CDSP as necessary. The MPRN falls back into the Must Read 'pot' requiring the IGT to continually visit the same property every 4 months. • Believe the Modification could be implemented in the

			<p>next Release after Authority approval, however as most of the system changes will be made to the CDSP systems, we recommend that the implementation date is coordinated with the CDSP solution delivery.</p> <ul style="list-style-type: none"> • Satisfied that the Legal Text delivers the intent of the Modification. • Disagree with the potential reciprocal provisions as where an issue has been flagged by the Shipper, the CDSP should remove the MPRN from the Must Read 'pot' prior to issuing it to the IGT. If the issue is flagged after the CDSP has issued the MPRN to the IGT, the IGT may not be able to recall it from the meter reader, so if a reading is obtained the IGT must be allowed to charge for it as normal.
ScottishPower	Support	D - positive F - positive	<ul style="list-style-type: none"> • Support's implementation of the Modification as it seeks to address the issue of meter read submission for the MUST Read process and align the IGT UNC with the UNC. <p>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.</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • Agree that this Modification is an Authority Decision Modification. • Agree that the Modification has a positive impact on Relevant Objectives (D) and (F).

			<ul style="list-style-type: none"> Confirmed that there are no additional costs expected as a result of this Modification. 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. No comments on the Legal Text. Agree with the proposed reciprocal provisions ensuring the CDSP notify the IGT of known issues. Additional comments regarding Business Rule 4 (SoLR and CoS) questioning whether the 4 month pause should be extended to 7 months to allow at least two visits to the consumer as there may be issues obtaining reads.
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Summary of Responses

There were 9 responses to the IGT159 consultation, 4 were received from IGTs, 4 were received from Shippers and 1 was received from a Supplier.

It is recommended that all consultation responses are looked at individually. All response to the IGT159 consultation can be found [here](#).

Governance

All respondents agreed that the Modification should be treated as an Authority Decision Modification.

Support for Implementation

7 respondents supported the implementation of the Modification with 2 respondents citing qualified support. Reasons for qualified support include general/broad support for the Modification but concerns about a gap in the Legal Text regarding the CDSP notifying IGTs of known issues highlighted by Shippers.

1 Respondent that cited qualified support also indicated that this support was dependent on an amendment being made to the Modification to ensure governance was in place to support the CDSP notifying IGTs of known issues.

Views on additional area of Panel consideration

7 respondents agreed that a reciprocal arrangement should 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.

1 respondent did not agree noting that where an issue has been flagged by the Shipper, the CDSP should remove the MPRN from the Must Read 'pot' prior to issuing it to the IGT. If the issue is flagged after the CDSP has issued the MPRN to the IGT, the IGT may not be able to recall it from the meter reader, so if a reading is obtained the IGT must be allowed to charge for it as normal.

1 respondent did not provide a view regarding the reciprocal arrangement.

Relevant Objectives

The majority of respondents felt that this Modification would a positive impact on Relevant Objectives:

- 6 respondents agreed that this Modification would have a positive impact on Objectives (F) (Efficiency in the implementation and administration of the Code) and (D) (Promoting effective competition);
- 2 Respondent agreed that this Modification would have a positive impact on Objective (F) only with 1 also say this positive impact would only be felt should changes be made to the Modification to address the cited gap; and
- 1 respondent advised that, without the amended legal text and the inclusion of provisions for the CDSP to notify IGTs of known issues, they disagreed with the Workgroups views and that the Relevant Objectives D and F would not be fully achieved.

Legal Text

6 respondents agreed that the Legal Text delivers the intent of the Modification. 1 respondent did not comment on the Legal Text. 2 respondents disagreed and felt that the Legal Text required changing to introduce provisions for the CDSP to notify IGTs of known issues identified and notified by shippers to the CDSP.

Implementation

All respondents agreed with the implementation approach and that IGT159 should be implemented as soon as possible following Authority decision but that the date should also align with the delivery of required system changes.

1 respondent indicated that their support for the implementation approach was dependent on the cited gap being filled. They also noted that, when considering the two implementation options set out in the ROM the preferred Option 1 is dependent on the success of the CMS delivery.

Impacts and Costs

3 respondents cited costs and/or impacts. 1 respondent noted that the amendment to the legal text be made, and the Modification approved, there will be additional costs to IGTs which are unclear at this stage due to the change and funding process by the CDSP. 2 respondents noted that impacts and costs were to be determined / being assessed.

1 responded advised that ongoing costs would be reduced due to the implementation of the Modification.

Additional Comments

1 responded highlighted a gap in the Legal Drafting whereby there is no provision for the CDSP to notify the IGTs of meters which have been excluded from the Must Read process. They felt that without this obligation, the IGTs will receive inaccurate notifications of which meters requiring a must read, which under the current proposed drafting, would result in IGTs not being able to recover their costs for the provision of associated reads.

Another responded advised that the proposal states that site visit information, relating to a fault with or concerns about the meter, should be recorded and reported. Consideration should also be given to reporting on readings obtained by the IGT but rejected by CDSP. Recent analysis of CDSPs rejection of their organisations must reads has shown that 50% of rejected reads are from properties that have been visited 2 or more times in the past 12 months for the purpose of obtaining a must read. The readings obtained each time are sequential and appear to validate each other as correct. These readings are not currently being passed to the Shipper to enable them to investigate and update the CDSP as necessary. The MPRN falls back into the Must Read 'pot' requiring the IGT to continually visit the same property every 4 months.

Additional comments regarding Business Rule 4 (SoLR and CoS) were submitted by a respondent questioning whether the 4 month pause should be extended to 7 months to allow at least two visits to the consumer as there may be issues obtaining reads.

Panel Comments (October 2022)

The Panel were taken through responses to the IGT159 consultation. The Panel considered respondents views in all areas but paid special attention to views regarding the area of additional consideration, which the Panel requested to be included as part of the consultation.

Parties were asked to consider whether reciprocal provisions should be added to the solution, and as a result the Legal Drafting, to ensure that there was clearer governance with regards to the CDSP notifying IGTs of known issues highlighted by Shippers.

The Panel acknowledge that most respondents (7 of 9) supported the introduction of the reciprocal provisions. The Panel also considered and acknowledged the unanimous Workgroup Support for the reciprocal provisions and the progression of a Variation Request to introduce said provisions.

The Panel considered additional comments provided by two respondents. The first was regarding a gap in the Modification regarding the CDSP notifying IGTs of sites with known issues. However, the Panel agreed that this was not a new issue. CDSP notifications to IGTs was considered by the Workgroup during development. IGTs were always intended to be notified of a site having a known issue but as the perceived method was for this to be done by removing relevant sites from the notification reports a specific provision was not included (like it was for Shippers). The acceptance of the Variation Request, which adds in reciprocal provisions to ensure the governance is clearer and ensures the CDSP notifies IGTs in the say way as Shippers, will address any perceived gap.

The Panel were advised by the Code Administrator that the intention to notify IGTs in addition to sites being removed from the notification report were included in the ROM provided by the CDSP. So, from a technical solution perspective, the intention to notify was always there and the reciprocal provisions will have no impact on the costs set out within the ROM or the delivery of the Modification.

The Panel acknowledged that there are wider issues with the Must Reads process that are not within the scope of this Modification. For example, comments were made by a respondent regarding cost recovery and issues with multiple read rejections. The Panel felt that these challenges were associated with existing limitations within the current Must Reads process. For example, with cost recovery, there will always be a gap between reports where the status of a site may change as notification reports are based on monthly data rather than real time data and that this issue was with the wider process rather than IGT159V.

They also considered a comment made by a respondent regarding the pause window for sites associated with a SoLR and/or CoS event. The respondent questioned whether the window (as set out in Business Rule 4) should be extended. A Panel member, who was also the respondent, advised that this was not necessarily something to be considered under IGT159V and advised that they did not want to hold up the Modification. The Panel agreed that this should be considered outside of IGT159V.

The Panel, having considered the views put forward by respondents, agreed that there were no new issues that required Workgroup Consideration and that no further changes were required to IGT159V.

11 Recommendations

Panel Discussions (August 2022)

The Panel considered the Modification, paying special attention to the solution and Business Rules, as well as the content of the Workgroup Report and the legal drafting.

A member noted that Part E, paragraph 11.4 of the Legal Text indicates that where a site has a known issue preventing a read from being obtained, and this has been notified to the CDSP, an IGT should not collect a read, and if they did a Shipper is not obligated to pay for said read. They added that paragraph 11.5 requires the CDSP to notify a Shipper where an IGT has identified a known issue. However, there is no reciprocal provisions for the CDSP to notify an IGT where a Shipper has identified a known issue. The member questioned how an IGT will know about a known issue if they are not notified. Adding that if an IGT is unaware of a known issue and visits the site to get a read, they will be unable to recover costs for the visit as technically the site will have a known issue associated with it.

The Code Administrator referenced discussions had by the Workgroup where it was noted that the CDSP will remove a site from the final notification report once they have been advised of a known issue. This means that a site should not be listed in the report and the IGT will not attempt a visit. The Workgroup also considered what would happen if an IGT visited a site and was unaware of a known issue. IGTs in the Workgroup advised that they would charge Shippers for the visit where the issue became apparent but would then cease any further visits until told otherwise. The Workgroup had no issue with this approach at the time.

A Panel member (who also took part in the Workgroup meetings) advised that as sites with known issues were going to be dealt with early and removed from the notification reports, that further notification to the IGT was not seen as necessary.

The Panel member who raised the concerns responded that they recognised the views of the Workgroup and the intent of the solution, but had concerns regarding the governance. They added that they understood how it was anticipated to work operationally. However, due to the way the Business Rules are worded, and therefore the Legal Text, the Code would not allow for the IGT to collect a read or charge for a read if there is a known meter issue associated with the site.

The Panel considered whether the concerns were the result of a misalignment between the Business Rules, solution and legal drafting. The Panel agreed by majority that the legal text aligns to, and delivers, the intent of the solution and the Business Rules.

As a result, the Panel agreed by majority that the Modification should be issued for consultation (rather than being sent back to the Workgroup) and that views from industry should be sought on whether there should be a reciprocal arrangement 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.

Panel's Recommendation to Interested Parties (August 2022)

The Panel recommended by majority that this report is issued to consultation and all parties should consider whether they wish to submit views regarding this Authority Decision Modification.

Additional Considerations (August 2022)

The Panel ask that all parties also consider the merits or otherwise of whether there should be a reciprocal arrangement 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.

The Panel ask that views on this matter be included in responses to the consultation.

Panel Discussions (October 2022)

Variation Request

The Panel were presented with a [Variation Request](#) for IGT159 on 28th October 2022. The Panel were taken through the reasons for the request, as well as relevant responses to the IGT159 consultation.

The Panel were advised that the Proposer, following consideration of respondents views to the Consultation, felt that a change to the Modification was needed to ensure the governance was clearer with regards to the CDSP notifying IGTs of known issues. The Panel were advised that the Workgroup considered the Variation Request as well as relevant consultation responses on 13th October and unanimously agreed that a Variation was needed and that they would support the progression of one.

The Panel reviewed the changes to the Modification as well as the Legal Drafting and agreed that these were minimal and clear. They also considered whether the changes to the Modification were material or non-material. The Panel unanimously agreed with the Workgroup that the changes to the Modification were non-material.

The Panel unanimously accepted the Variation Request and as a result, IGT159 was withdrawn and replaced with IGT159V.

The Panel considered the next steps for IGT159V and agreed that the Modification should proceed to the Authority for decision, rather than out for consultation a second time. This is because the need for the changes in the Variation Request were considered by industry as part of the IGT159 consultation (supported by 7 of 9 respondents) and the Variation Request itself was considered and discussed by the Workgroup, who unanimously support its progression.

Consultation Responses

The Panel, having considered views put forward by respondents and paying particular attention to views on potential changes to the Modification (which informed the now IGT159V) as well as additional comments with regards to the Must Read process, unanimously agreed that there were no new issues that required Workgroup consideration and that no further changes were required to IGT159V.

Final Modification Report (FMR)

The Panel considered the IGT159 FMR and unanimously agreed:

- that IGT159 does not have an impact on any SCRs;
- that IGT159 is an Authority Decision Modification;
- that Impacts and costs were accurate and appropriate, and they had nothing new to add;
- that IGT159V will have a positive impact on Objectives (D) and (F);
- with the proposed implementation approach;
- that the IGT159 solution delivers the intent of the Modification; and
- that the Legal Drafting delivers the intention of the solution.

Further details with regards to Panel discussions can be found in the relevant sections of this FMR.

Panel Recommendation to Authority (October 2022)

The Panel unanimously recommended:

- that Modification IGT159V be implemented.