

Consultation Response

IGT167: Alignment of the IGT UNC with UNC NGT Demand Side Response Arrangements

Responses invited by: 11 AUG 2023

Respondent Details

Name: Charlotte Gilbert
Organisation: BUUK

Support Implementation	<input checked="" type="checkbox"/>
Qualified Support	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Do Not Support	<input type="checkbox"/>

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

As proposer of this modification we fully support it being implemented. This proposal seeks to align the IGT UNC with the UNC governance. It will also allow for Class 1 and 2 Consumers on IGT sites to be able to access DSR arrangements.

Self-Governance Statement

Do you agree with the Modification Panel’s determination with respect to whether or not this should be a self-governance modification?

We support the Panel’s determination that this should be an Authority Decision modification to align with that of the UNC modification this looks to replicate.

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

None.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We believe that this modification will have a positive impact on relevant objectives (A) and (B), as was also highlighted in the UNC modification discussions.

Impacts and Costs

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

None.

Implementation

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

We believe that this modification should be implemented as soon as possible to prevent Consumers on IGT networks to be disadvantaged.

Legal Text

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

Yes, we support the legal text in this modification, including the variations should UNC modifications 0844 or 0845 not be approved.

Further Comments

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

It should be noted that although this modification has had a shortened turnaround than that what is usual, the sections in this modification are replicated from four UNC modifications that have all been through full debate and scrutiny under the UNC. This has been through workgroups and Panel, with Modifications 0822 and 0833 being approved by Ofgem already and 0844 and 0845 awaiting decision following support from Panel after Consultation stage.

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