

**Consultation Response**

**IGT169:** Aligning the Capacity requirements for NExA Supply Points in the UNC with Capacity requirements for LDZ CSEP Ancillary Agreement (LCAA) Supply Points under the IGT UNC (i.e., bringing Code in line with UNC0701 and UNC0853).

Responses invited by: 20th October 2023

**Respondent Details**  
 Name: Stuart Monk  
 Organisation: mua Gas Limited

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**

The mod seeks to bring in line existing arrangements that will allow Shipper users to not be adversely affected by sites with NEXA/LCAA arrangements in place offering fairness across the industry whether connected to an IGT or GDN system.

Without this mod, some Shipper users could fall foul of the Code without knowing they have done, and also could cause a catastrophic failure of the network in the worst case scenario that might affect thousands of supply points.

## **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?**

It should progress to self governance as it is just aligning the Code with the UNC. It should then be an authority Decision as that was the same with the similar mod under the UNC

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

The 'do nothing' could have a mass impact (worse case scenario) of a offtake of the gas system that the system could not support, if this occurs then potentially thousands of supply points could be affected.

## **Relevant Objectives**

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

Yes, in a positive way.

## **Impacts and Costs**

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

The mod has highlighted that the IT systems needed by the CDSP are already in situ and can be used by an IGT (which was a byproduct of the UNC equivalent Change UNC0701) and so there shouldn't be any costs if this modification is accepted. If not accepted, then there would likely be a cost to change the exception rules of the CDSP systems to separate out the IGT.

## **Implementation**

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

The timescales proposed are suitable, as this mod needs to follow the implementation of UNC0701 and UNC0853 as closely as possible (November 2023 rollout)

**Legal Text**

**Are you satisfied that the legal text will deliver the intent of the modification and are satisfied with the amendments made following discussions during Workgroup?**

The legal text is suitable for what is trying to be achieved for this mod

**Further Comments**

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

No further comment

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