

Modification	At what stage is this document in the process?
IGT177: Aligning IGT “must read” obligations within the IGT UNC	01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification Report
Purpose of Modification: This Modification will maintain the existing obligation on IGTs to obtain a meter reading (commonly called the “must read” obligation) following non-provision of a Valid Meter Reading by a Shipper, by removing reference to UNC TPD M 5.10 from IGT UNC Part E – Meter Reading, 11 (Failure to obtain readings), and aligning the total relevant text within the IGT UNC.	
	The Proposer recommends that this Modification should be: • subject to Self-Governance • assessed by one Workgroup • proceed to Consultation This Modification will be presented by the Proposer to the Panel on 30th May 2025. The Panel will consider the Proposer’s recommendation and determine the appropriate route.
Impacted Parties and Codes	
	High Impact: None
	Medium Impact: None
	Low Impact: IGT UNC, Shippers, Suppliers, Transporters, Consumers, CDSP

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Timetable

The Proposer recommends the following timetable:

Modification raised	21 st May 2025
Initial consideration by Workgroup	12 th June 2025
Amended Modification considered by Workgroup	-
Workgroup Report presented to Panel	27 th June 2025
Draft Modification Report issued for consultation	30 th June 2025
Consultation Close-out for representations	21 st July 2025
Variation Request presented to Panel	-
Final Modification Report available for Panel	22 nd August 2025
Modification Panel decision	29 th August 2025



Any questions?

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1 Summary

What

Prior to Project Nexus in 2017, all IGT network governance was contained within the IGT UNC. Following Nexus implementation, a 'pointing to' the UNC approach for some governance was adopted. Since 2017 it has been demonstrated that some instances of this approach work and some do not. The IGT UNC makes reference to the UNC in relation to Meter Reading, specifically in this case of failure to obtain readings. This Proposal intends to align the obligation of IGTs undertaking "must reads" in the event that a Shipper does not provide a Valid Meter Reading as required by TPD M 5.7, 5.8 and 5.9, and to ensure it is a stand-alone within the IGT UNC.

The "must reads" process is designed to ensure that actual meter readings are routinely obtained for every gas Supply Point. It is a mechanism that ensures that there is at least some level of guaranteed data in the event Shippers are unable to provide a Valid Meter Reading.

By removing the UNC reference and aligning the relevant legal text within the IGT UNC, it allows this area of governance to stand alone and to not be impacted by changes to the UNC. This would ensure the robustness of an existing obligation on IGTs to obtain meter reads where Shippers have failed to do so.

Why

[UNC Modification 0908¹](#) looks to remove the "must reads" obligation on Large Transporter networks.

There is a risk that proposed changes to UNC TPD M 5.10 will inadvertently and incorrectly remove an existing obligation on IGT networks. This is not the intent of UNC 0908 and aligning whole text within the IGT UNC will prevent this occurrence.

How

The existing provisions within UNC TPD Section M that need to be suitably placed under the IGT UNC are as follows:

- 5.10
- 5.10.1
- 5.10.2 (a) and (b)
- 5.10.3 (a) and (b)
- 5.10.4
- 5.10.5
- 5.10.6 (a), (b) and (c)
- 5.10.8

¹ 0908 - Removal of DNO meter reading obligations resulting from non-provision of a Valid Meter Reading

2 Governance

Justification for Self-Governance

The Modification meets the requirements for Self-Governance, and there are no changes of process for, nor additional governance on, any IGT or Shipper parties. This is merely ensuring that Code reflects the current obligations and is not subject to unintended consequences of UNC0908.

It will have no material effect on:

- (aa) existing or future gas consumers;
- (bb) competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes;
- (cc) the operation of one or more pipe-line system(s);
- (dd) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies;
- (ee) the uniform network code governance procedures or the network code modification procedures; and is unlikely to discriminate between different classes of parties to the uniform network code/relevant gas transporters, gas shippers or DN operators.

Requested Next Steps

This Modification should:

- be subject to Self-Governance;
- be assessed by one Workgroup; and
- proceed to Consultation

3 Why Change?

The IGT UNC frequently cross-references UNC legal text rather than having stand-alone text within the IGT UNC.

In this particular instance, there is a risk that it could lead to an unintended consequence, where a UNC Modification is looking to remove an obligation on Large Transporter networks. This Modification would rectify the issue by self-containing the obligation for IGTs to ensure “must reads” are taken where a Shipper has not provided a Valid Meter Reading.

4 Code Specific Matters

Technical Skillsets

N/A

Reference Documents

[UNC – Transportation Principal Document, Section M – Supply Point Metering](#)

[IGT UNC Part E](#)

5 Solution

To ensure that an existing IGT UNC obligation is not inadvertently and incorrectly removed from the IGT UNC, the relevant text within IGT UNC Part E – Meter Reading, will be amended to align as stand-alone governance for this existing obligation.

The existing provisions within UNC TPD Section M will be merged with the text already existing within the IGT UNC Part E – Meter Reading, 11 (Failure to obtain readings). The Draft Legal Text document on the [IGT177 webpage](#).

The UNC TPD Section M paragraphs to be merged into the IGT UNC are as follows:

- 5.10
- 5.10.1
- 5.10.2 (a) and (b)
- 5.10.3 (a) and (b)
- 5.10.4
- 5.10.5
- 5.10.6 (a), (b) and (c)
- 5.10.8

For clarity, these changes will correctly encompass the changes made to IGT UNC as part of IGT159.

6 Impacts & Other Considerations

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

This Modification will not impact a Significant Code Review (SCR), nor will it impact a significant industry change project.

Consumer Impacts

What is the current consumer experience?

The consumer experience of the “must read” process is a positive experience. Consumers are likely to be unaware if a Shipper fails to obtain a Meter Reading within the defined period of time, as a read will be obtained by the IGT, thereby maintaining an accurate record of their consumption as possible.

This obligation acts in two ways:

- i) by acting as an incentive on Suppliers to undertake regular meter readings and,
- ii) as a backstop when the Supplier fails to obtain regular reads. The meter read undertaken by the IGT acts as a safeguard, helping prevent the consumer from facing periods of estimated billing.

The removal of cross referencing the UNC in relation to this matter and embodying the legal text into the IGT UNC will ensure these consumer benefits are not inadvertently and incorrectly threatened.

What would the new consumer experience be?

There will be no change to the consumer experience. This is merely to safeguard this process from being removed as an unintended consequence of proposed changes to the relevant part of the UNC.

Impact of the change on Consumer Benefit Areas

Area	Identified Impact
Improved safety and reliability	None
Lower bills than would otherwise be the case	Positive
Reduced environmental damage	None
Improved quality of service	Positive
Benefits for society as a whole	None

Cross-Code Impacts

This Modification does not propose to change the process, so we do not foresee any cross-code impacts. UNC Modification 0908 is not intended to include IGTs, who operate under a different process to Large Transporters.

UNC	☐
REC	☐
Other	☐
None	☒

Environmental Impacts

No environmental impacts have been identified.

Other considerations

The “must read” obligation is not a new process and has existing benefits to the consumer.

The “must reads” process helps provide more accurate billing for customers, as bills are based on actual reads rather than estimates, creating a better consumer experience. By improving the quality and timeliness of meter data by undertaking the “must reads” obligation, it helps reduce Unidentified Gas (UIG).

There is a risk that these existing benefits to the consumer could be unintentionally removed by Modifications to the UNC. This would have a consequent negative impact on the consumer experience.

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	None

(ii) the pipe-line system of one or more other relevant gas transporters	
(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	None
(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

(F) Promotion of efficiency in the implementation and administration of the Code:

The IGT UNC frequently cross-references UNC legal text rather than replicating the text again within the IGT UNC. This Modification would remove the necessity to cross-reference and help self-contain the obligation for IGTs to ensure “must reads” are taken where a Shipper does not provide a Valid Meter Reading. The embodiment of the obligation would help solidify the IGT UNC, allowing an easier understanding of the obligations required for “must reads” with the legal text being self-contained. Administering the Code would be subsequently made easier as the legal text would be clearly set out, and not prone to unintended changes derived from the UNC. IGTs will continue to operate as a backstop to improve settlement, in undertaking Meter Reads which have been missed.

8 Implementation

We would recommend that the Modification is implemented as soon as feasibly possible. The earlier the Modification is implemented, the less vulnerable the “must reads” governance process on IGT networks is to unintended consequences resulting from proposed changes to the UNC.

9 Legal Text

Text Commentary

The existing provisions within UNC TPD Section M will be merged with the text already existing within the IGT UNC Part E – Meter Reading, 11 (Failure to obtain readings). The relevant proposed legal text can be found in the legal text document attached.

The UNC TPD Section M paragraphs to be merged into the IGT UNC are as follows:

- 5.10
- 5.10.1
- 5.10.2 (a) and (b)
- 5.10.3 (a) and (b)
- 5.10.4
- 5.10.5
- 5.10.6 (a), (b) and (c)
- 5.10.8

Suggested Text

For the suggested legal text for IGT UNC Part E – Meter Reading, 11. Failure to obtain readings, please refer to the Draft Legal Text document on the [IGT177 webpage](#) that contains the suggested legal text.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- agree that Self-Governance procedures should apply;
- refer this proposal to one Workgroup for assessment; and
- proceed to Consultation.