

Consultation Response

IGT177: Aligning IGT “must read” obligations within the IGT UNC

Responses invited by: 21 July 2025

Respondent Details

Name: Aleksis Butler

Organisation: BUUK

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We are in full support of IGT177. The Modification is a perfect example of responsible code stewardship, recognising when reliance on another Code becomes a risk and taking appropriate, scoped action to safeguard an existing process.

The maintenance of the obligation is taking appropriate action against a potential risk to the Code and would help maintain an existing benefits to the consumer.

This is all doable in a simplistic manner, merely lifting and shifting the existing text into IGT UNC. The Modification is not expected to see any impact on Parties of the IGT UNC, and would be able to be implemented as soon as feasibly possible.

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?

Yes, we are in full agreement that IGT177 should be subject to self-governance. The Modification meets the criteria for Self-Governance, with no changes of process, nor additional governance on any IGT or Shipper parties. The Modification is simple in nature, as it simply looks for IGT UNC to reflect the current obligations and prevent any unintended consequences of UNC0908.

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

N/A

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We are in strong agreement with the identified positive impact on objective '(F) Promotion of efficiency in the implementation and administration of the Code'. The Modification in its nature is one of clearest examples of this objective being operated. The Modification looks to maintain an element of Code which at present is not embodied in the legal text, by specifically moving it into the IGT UNC, and ensuring it is not at risk of any unintended impacts of UNC0908.

Impacts and Costs

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

There are no expected costs with the implementation of IGT177. The Modification would directly lift the text that is already being pointed to in the UNC, and placing it into IGT UNC, which would consequently continue an existing and well-established obligation.

Implementation

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

We support the implementation of IGT177 as part of an Extraordinary IGT UNC Release, and that this Release should take place as soon as possible following approval and the closure of the 15 Working Day Appeal Window. The suggested legal text drafting is simplistic in nature, and urgent implementation would minimise the risk of any unintended consequences that might be borne out of UNC0908.

Legal Text

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

Yes, we are satisfied that the legal text will deliver the intent of the Modification. The suggested legal text that has been presented shows the simplistic nature of this Modification – it directly lifts the text being pointed to in UNC TPD M 5.10, and places it into IGT UNC Part E – Meter Reading, 11. Failure to obtain Readings, thus persevering current obligations from any unintended consequences from UNC0908.

Further Comments

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

While IGT177 does not introduce the “must reads” process into code, it does look to maintain its presence in IGT UNC, and with that the existing benefits the “must read” obligation brings. For example, 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).

Although UNC0908 is focussed on DNO obligations and does not intend to impact IGT “must reads”, its current drafting creates a potential risk to IGT UNC, and IGT obligations. As consequence, there is a risk that these existing benefits to the consumer could be unintentionally removed by UNC0908. This would have a consequent negative impact on the consumer experience.

IGT177 simply looks to mitigate this risk and will safeguard the continuity of the “must read” process for consumers.

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