

Consultation Response

IGT177: Aligning IGT Must Read Obligations within the IGT UNC

Responses invited by: 21 July 2025

Respondent Details

Name: Cher Harris

Organisation: Indigo Pipelines Limited

Support Implementation

X

Qualified Support

☐

Neutral

☐

Do Not Support

☐

IGT177

Consultation Response

21st July 2025

Version 1.0

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

Whilst we agree in principle that if IGTs wish to retain the Must Read obligation, the necessary legal text should be moved back into IGT UNC governance. However, should UNC908 be implemented and the Must Read obligation no longer apply to Large Transporters, it is not clear to us that all IGTs will wish to retain an obligation that Large Transporters no longer have.

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 agree with the proposer that this Modification meets Self-Governance criteria

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

None identified

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree that this Modification has a positive impact on Objective F, by placing the legal text for an IGT Obligation clearly within IGT UNC, under IUNC Governance.

Impacts and Costs

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

We agree that IGT177 on its own does not add any additional costs or impact existing procedures. However, should UNC908 be implemented, IGTs may incur additional CDSP costs by having retained the Must Read obligation and therefore becoming sole users of the CDSP service

Implementation

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

We accept the proposer's suggestion that this Modification be implemented earlier than the next scheduled release, due to the likelihood of changes being made to the current legal text located within UNC, as a result of development of UNC908.

Legal Text

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

We are satisfied that the legal text will deliver the intent of the modification

Further Comments

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

None

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