

Modification		At what stage is this document in the process?
IGT178: PC4 Read Submission Window Extension		01Modification 02Workgroup Report 03Draft Modification Report 04Final Modification Report
Purpose of Modification: This Modification seeks to align the IGT UNC with the UNC following the implementation of UNC0884: Extending the PC4 Read Submission Window. The reference within the IGT UNC to the number of Supply Point Systems Business Days (SPSBD) after the read date to submit a read for settlement needs to be updated to remain aligned.		
	The Proposer recommends that this Modification should be: • treated as an Authority Direction Modification Proposal; • assessed by a Workgroup; and • proceed to Consultation This Modification will be presented by the Proposer to the Panel on 29th August 2025. The Panel will consider the Proposer’s recommendation and determine the appropriate route.	
Impacted Parties and Codes		
	High Impact: N/A	
	Medium Impact: IGTs, Shippers, Suppliers	
	Low Impact: IGT UNC, Consumers, CDSP	

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Timetable

The Proposer recommends the following timetable:

Modification Raised	24 th July 2025
Initial Panel Consideration	29 th August 2025
Initial consideration by Workgroup	11 th September 2025
Workgroup Report presented to Panel	26 th September 2025
Draft Modification Report issued for consultation	29 th September 2025
Consultation Close-out for representations	20 th October 2025
Final Modification Report available for Panel	24 th October 2025
Modification Panel decision	31 st October 2025



Any questions?

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1 Summary

What

The Modification would update the legal text of the IGT UNC to reflect and align the Code following the implementation of UNC0884. Currently the IGT UNC allows 25 SPSBDs for submitting reads for Class 4 Supply Meter Points. Aligning the IGT UNC with the UNC would allow for the extension in time for submitting reads for Class 4 Supply Meter Points beyond the 25 SPSBDs.

UNC0884 introduces staggered benchmarks for both domestic and non-domestic premises, which would allow relevant Class 4 Meter reads to be submitted by 45th SPSBDs and 80th SPSBDs. The benchmark can be seen in greater detail below:

Staggered Benchmarks for Domestic Premises to be introduced:

- a) not less than 50% of Relevant Class 4 Meters reads are submitted by the 10th Supply Point Systems Business Day after the Read Date;
- b) not less than 80% of Relevant Class 4 Meters reads are submitted by the 25th Supply Point Systems Business Day after the Read Date;
- c) not less than 90% of Relevant Class 4 Meters reads are submitted by the 45th Supply Point Systems Business Day after the Read Date;
- d) not less than 100% of Relevant Class 4 Meters reads are submitted by the 80th Supply Point Systems Business Day after the Read Date; and the CDSP shall notify each User of its performance in such respect.

Staggered Benchmarks for Non-Domestic Premises to be introduced:

- a) not less than 50% of Relevant Class 4 Meters meter reads are submitted by the 10th Supply Point Systems Business Day after the Read Date;
- b) not less than 80% of Relevant Class 4 Meters reads are submitted by the 25th Supply Point Systems Business Day after the Read Date;
- c) not less than 100% of Relevant Class 4 Meters reads are submitted by the 45th Supply Point Systems Business Day after the Read Date;

and the Central Data System Provider shall notify each User of its performance in such respect.

Why

The direct referencing between the IGT UNC and the UNC ensures that there is a uniform approach delivered to parties of the gas industry. Aligning the IGT UNC following the implementation of UNC0884 would prevent any unnecessary, and unintentional non-Code compliance related to the latest interpretation of the UNC. Furthermore, the extension of time in parties being able to supply valid reads would help decrease settlement imbalance, Unidentified Gas (UIG), additional costs for site visits, and the volume of “must reads” obligations being undertaken.

How

The implementation of UNC0844 modified the legal text of the UNC Transportation Principal Document (TPD), Section M - Supply Point Metering, paragraph 5.9.4 and paragraph 5.9.5. The Modification updated the window beyond the 25 SPSBD for a read to be undertaken.

This Modification proposes to amend Clause 11.2 of Part E of the IGT UNC, which currently references a 25 SPSBD limit for “must read” submission timelines.

To resolve this, Clause 11.2 should be updated to reference the new domestic / non-domestic read window as defined in UNC TPD Section M – Supply Point Metering, paragraph 5.9.4.

2 Governance

Justification for Authority Direction

Reflecting the decision that was made at UNC Panel; UNC0884 was determined not to meet Self-Governance criteria, as the Modification was seen to have an impact on:

- (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;

With this in mind, we would suggest that this Modification should also be treated as an Authority Direction Modification Proposal.

Requested Next Steps

This Modification should:

- be treated as an Authority Direction Modification Proposal.

3 Why Change?

UNC0884 has introduced an extended read submission window for Class 4 Supply Meter Points, along with staggered read submission benchmarks to improve data quality, and settlement accuracy. These changes were made to UNC TPD Section M – Supply Point Metering, paragraph 5.9.4 and 5.9.5.

This Modification would help ensure the IGT UNC is in alignment with the updated UNC framework. This would help prevent any unnecessary, and unintentional, non-Code compliance. Furthermore, this would also prevent any incorrect charges to Pipeline Users for reads which would be valid under the new extended window, thus negatively affecting the consumer.

4 Code Specific Matters

Technical Skillsets

N/A

Reference Documents

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

[UNC 0884: Extending the PC4 Read Submission Window](#)

[IGT UNC – Part E – Meter Reading](#)

5 Solution

The suggested solution is to make a reference to Section M of UNC TPD, under Clause 11.2 of Part E of the IGT UNC, to ensure the Maximum permitted read submission window is aligned for the relevant category of Supply Meter Point. This will help alignment of the IGT UNC with the UNC.

The suggested solution can be found in the suggested legal text document associated with this Modification.

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?

Under the current 25 SPSBD read submission window, consumers are more likely to receive estimated bills when meter reads are delayed or fail validation. This can lead to inaccurate billing, and unnecessary site visits, which lead to a poor consumer experience. The current read window offers limited flexibility for resolving issues related to meter reading.

What would the new consumer experience be?

This Modification will have a neutral to positive impact on consumers. While the Modification is industry-facing, it supports more accurate billing, fewer incorrect charges, and reduces the need for estimations.

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	None
Benefits for society as a whole	None

Lower bills than would otherwise be the case:

Mirroring the discussions of UNC0884, the change to the read submission window being used in the intended way – to accommodate difficult reads, there should be a slight improvement in settlement accuracy.

Cross-Code Impacts

None identified. However, this Modification is being raised as a result of UNC0884, though there is no direct impact on this UNC Modification or the UNC generally as a result of IGT178.

UNC	☐
REC	☐
Other	☐
None	☒

Environmental Impacts

None identified.

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 (ii) the pipe-line system of one or more other relevant gas transporters	None
(C) Efficient discharge of the licensee's obligations	None
(D) Securing of effective competition: (i) between relevant shippers;	None

(ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers	
(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

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

The Modification aims to assist in aligning the IGT UNC with the UNC. This direct referencing between the two Codes (IGT UNC and UNC) ensures that a uniform approach is delivered for gas industry parties. The Modification consequently promotes efficiency in the implementation and administration of the Code as it ensures that the Code is aligned with the UNC and prevents risks of unintentional non-compliance.

8 Implementation

We would recommend that the Modification is implemented as soon as possible, conditional to the implementation of UNC0884. We would recommend that the Modification should be implemented on a date that is aligned with the potential implementation of UNC0884.

This will help ensure that the risk of unintended non-compliance with the Code would be negated and would be a benefit to industry participants and consumers.

9 Legal Text

Text Commentary

The legal text under Clause 11.2 of Part E of the IGT UNC shall be updated to help alignment of the IGT UNC with the UNC.

Suggested Text

For the suggested legal text for this Modification, please refer to the suggested text document on the Modification webpage.

Other Considerations

We, the Proposer, and the Code Administrator have been in discussions surrounding IGT177, and that IGT177 will amend the same area of text. However, the changes proposed do not clash directly with the IGT178 changes, nor will either set of drafting impact the intent of the other.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to agree that this Modification:

- should be treated as an Authority Direction Modification Proposal;
- should be assessed by a Workgroup; and
- proceed to consultation.