

| Final Modification Report                                                                                                                                                                                                                                                                                                                                                                                                  | At what stage is this document in the process?                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <h1>IGT177:</h1> <h2>Aligning IGT “must read” obligations within the IGT UNC</h2>                                                                                                                                                                                                                                                                                                                                          | <div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>                                                      |
| <p><b>Purpose of Modification:</b></p> <p>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.</p> |                                                                                                                                                                                                |
|                                                                                                                                                                                                                                                                                                                                         | <p>The Panel considered this Modification on <b>29<sup>th</sup> August 2025</b>.</p> <p>The Panel has unanimously determined that this Self-Governance Modification should be implemented.</p> |
|                                                                                                                                                                                                                                                                                                                                         | <p><b>High Impact:</b></p> <p>None</p>                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                                                         | <p><b>Medium Impact:</b></p> <p>None</p>                                                                                                                                                       |
|                                                                                                                                                                                                                                                                                                                                         | <p><b>Low Impact:</b></p> <p>IGT UNC, Shippers, Suppliers, Transporters, Consumers, CDSP</p>                                                                                                   |

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Any questions?

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## Timeline

### Modification timetable:

|                                                   |                                       |
|---------------------------------------------------|---------------------------------------|
| Modification raised                               | 21 <sup>st</sup> May 2025             |
| Initial consideration by Workgroup                | 12 <sup>th</sup> June 2025            |
| Workgroup Report presented to Panel               | 27 <sup>th</sup> June 2025            |
| Draft Modification Report issued for consultation | 30 <sup>th</sup> June 2025            |
| Consultation close-out for representations        | 21 <sup>st</sup> July 2025            |
| Final Modification Report available for Panel     | 21 <sup>st</sup> August 2025          |
| Modification Panel decision                       | 29 <sup>th</sup> August 2025          |
| Appeal window close-out                           | 19 <sup>th</sup> September 2025       |
| <b>Extraordinary Implementation Date</b>          | <b>26<sup>th</sup> September 2025</b> |

## 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 Uniform Network Code (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 UNC Transportation Principle Document (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 0908](#)<sup>1</sup> 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 UNC0908 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

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<sup>1</sup> 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.

### Initial requested next steps

This Modification should:

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

### Workgroup discussions and conclusions

#### May 2025

The Workgroup, having considered discussions and conclusions on the Modification, considered the governance route for IGT177.

The Proposer advised that what had been discussed by the Workgroup did not change their views with regards to the Modification being progressed as a Self-Governance Modification Proposal. The Workgroup agreed with the Proposer that IGT177 should be subject to Self-Governance for the reasons set out above.

### Panel initial views

#### May 2025

The Panel, having considered the views of the Proposer and the Workgroup, unanimously agreed that this Modification continues to meet the Self-Governance Criteria and should therefore continue to be progressed as a Self-Governance Modification Proposal.

### Panel decision

#### August 2025

The Panel considered all consultation responses and agreed unanimously that this Modification continues to meet the Self-Governance Criteria.

### 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 and final Legal Text documents can be found 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.

## Workgroup discussions and conclusions

### May 2025

The Proposer provided the Workgroup with an overview of the Modification, including the intent of UNC0908 as set out within this document.

A Workgroup member referenced the principle of UNC0908, which is looking to improve the scrutiny around Meter Reading performance and therefore the area of Code changing will be referencing the UNC Performance Assurance Committee (PAC). It should be assumed that these new provisions will also apply to IGTs. They noted discussions regarding the positives of this Modification, though this could be dampened by IGT177.

The Chair responded, noting that whilst UNC0908 might say there may be a better approach, it should not detract from the benefits of IGT177. The member responded that IGT177 is pre-empting the fact that these provisions will be removed from Code.

The Proposer advised that they understood the argument, however the proposed protection is based on the information available to us today and the provisions that are in Code today. There is nothing stopping UNC0908 from bringing other improvements to industry and there is nothing stopping anyone raising a Modification to the IGT UNC to replicate that in the future, when there can be an evidence-based assessment of both approaches. They added that there is evidence to suggest that not all Shippers agree with UNC0908 and that the PAC may not agree with it either, so there are arguments for and against and introducing the protection of current provisions into the IGT UNC does not impact that.

There were no further comments or areas of consideration raised by the Workgroup with regards to the solution.

## Panel initial views

### May 2025

The Panel considered the proposed solution as well as Workgroup discussions and conclusions.

A Panel member acknowledged that most members of the Panel were in attendance at the Workgroup meeting where this Modification was considered. They confirmed that they have no further comments beyond what was said in the Workgroup and are happy that no further work is required on the Modification.

Other Panel members agreed with this view. One member noted that, whilst they were not in attendance at the meeting, they reviewed the minutes of the meeting and are happy with the discussions and had nothing further to add.

The Panel unanimously agreed that the solution delivers the intent of the Modification and that no further work was required by the Workgroup.

## Panel decision

### August 2025

The Panel considered all consultation responses and agreed unanimously that the solution delivers the intent of the Modification and that no further work was required by the Workgroup.

## 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 an SCR, nor will it impact a significant industry change project.

#### Workgroup discussions and conclusions (May 2025)

The Workgroup considered the potential impacts of this Modification on an SCR or a significant industry change project. The Workgroup agreed with the Proposer that this Modification will not have an impact on either.

#### Panel initial views (May 2025)

The Panel considered the Proposer and Workgroup views regarding impacts of this Modification on an SCR or significant industry change project. The Panel unanimously agreed that IGT177 will not have an impact on either.

#### Panel decision (August 2025)

The Panel considered all consultation responses and agreed unanimously that IGT177 will not have an impact on an SCR or 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:

- a) by acting as an incentive on Suppliers to undertake regular Meter Readings and;
- b) 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 to 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   | <u>Proposer</u> : Positive<br><u>Workgroup</u> : Neutral |
| Reduced environmental damage                   | None                                                     |
| Improved quality of service                    | <u>Proposer</u> : Positive<br><u>Workgroup</u> : Neutral |
| Benefits for society as a whole                | None                                                     |

## Other considerations

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

The “must read” 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 consequential negative impact on the consumer experience.

## Workgroup discussions and conclusions (May 2025)

The Proposer provided their rationale regarding the positive impacts on consumers and other considerations as set out above to the Workgroup. They noted that the positives highlighted are from the perspective of protecting the positives in place already via the existing Code. So, these benefits will be realised by protecting current processes and obligations.

A member noted that, as this Modification is only looking to allow for current processes to continue, they do not feel that there is a positive impact. Another member agreed, thought they noted that nothing within the process is changing, and they are happy with this. The Proposer agreed that whilst nothing is changing, IGT177 is protecting the existing benefits from being inadvertently removed as a result of UNC0908.

The Workgroup considered the rationale provided by the Proposer. The Workgroup agreed with the principle of the Modification, though three Workgroup members felt that the Modification had a neutral impact on benefits to consumers.

There were no other views provided by the Workgroup. Workgroup members agreed that the Workgroup’s view on the Modification is that it has a neutral impact on consumers.

### Panel initial views (May 2025)

The Panel considered the Proposer and Workgroup views, as well as conclusions regarding impacts on consumers. The Panel unanimously agreed that all matters had been concluded and that no further work was required by the Workgroup.

### Panel decision (August 2025)

The Panel considered all consultation responses and unanimously agreed that all matters had been concluded and that no further work was required by the Workgroup.

### Cross-Code impacts

This Modification does not propose to change the process, so the Proposer does not foresee any cross-Code impacts. UNC0908 is not intended to include IGTs, who operate under a different process to Large Transporters.

|       |                                     |
|-------|-------------------------------------|
| UNC   | <input type="checkbox"/>            |
| REC   | <input type="checkbox"/>            |
| Other | <input type="checkbox"/>            |
| None  | <input checked="" type="checkbox"/> |

### Workgroup discussions and conclusions (May 2025)

The Workgroup considered the potential cross-Code impacts as a result of the Modification.

The Chair suggested that UNC0908 should record an impact on the IGT UNC due to the potential unattended consequential impacts of DNOs pulling out of the Must Reads process. They added that if IGT177 is not implemented some action may be needed under the IGT UNC due to the removal of UNC provisions currently referenced within the IGT UNC.

The Proposer agreed with this view. The Workgroup agreed that IGT177 will not have any cross-code impact. However, it was acknowledged that UNC0908 is discussing the same area of legal drafting and that a cross-code impact on the IGT UNC should be noted.

### Central Data Service Provider (CDSP)

A member noted that there is currently no reference to potential CDSP impacts within the Proposal Form. They acknowledged that, due to the transitional nature to this Modification, you could argue that there are no CDSP impacts as all this is doing is lifting existing Code. However, there may be costs in the future. The Member asked the Proposer for clarification on the approach to the legal text and whether it is a simple lift of text or if anything has been excluded. The Proposer confirmed that they have lifted the relevant paragraphs, only making minor amendments to terms etc. to make it IGT UNC relevant.

The Proposer added that if discussions under UNC0908 continue in line with the current solution approach then the must read obligations will be removed for the Distribution Network Operators (DNOs). They added that they would still expect the current arrangements and CDSP processes to remain for IGTs regardless of the UNC Modification.

The member added that this Modification seeks to keep the status quo meaning that if UNC0908 goes through there may be a chain of consequences as the CDSP may need to take action as a result of

DNO's pulling out of this process. There could be a point where funding splits need to be discussed as part of the DSC change process. Though not as a result of this Modification.

The Proposer agreed that it is important to note these impacts but recognise that these discussions need to happen under UNC0908. They clarified that there will be no additional costs to any parties, including IGTs, as a result of IGT177. What transpires as a result of UNC0908 would transpire regardless. The Workgroup agreed with this view.

### Panel initial views (May 2025)

The Panel considered the Proposer and Workgroup views regarding cross-Code and CDSP impacts.

A Panel member, who had reviewed the Workgroup meeting minutes but had not attended the meeting, was not convinced that IGT177 would not result in an increase in cost to IGTs.

The Chair confirmed, having attended the latest UNC0908 Workgroup meeting, that a Rough Order of Magnitude (ROM) had been formally requested. A Panel member asked whether that ROM was expected to include any cost of providing the "must read" services to IGTs only. The Chair advised that the UNC0908 Proposer had expressed a view in the meeting that they would be disappointed should costs arise as a result of UNC0908. They added further that IGT177 was not discussed in reference to the ROM. They noted that whilst Xoserve are aware of both Modifications they anticipate the ROM will include the removal of the process from the UNC for Large Transporters only.

Another Panel member referenced the content of the Workgroup Report and considered whether it was reflective enough of the discussions, noting that the CDSP had challenged the impacts of IGT177 on UNC0908 and acknowledged that the IGT UNC Modification should stand alone, with any discussion on UNC0908 being had on its own merits. They referenced the most recent UNC0908 Workgroup meeting where an action had been taken to determine why IGT177 had been raised. They added further that the Proposer of UNC0908 had made it clear that the UNC Modification was to only apply to Large Transporter sites and was not intended to apply to IGT sites.

The Chair confirmed that they had picked up this action and that an item of AOB will be added to the July IGT UNC Workgroup meeting to support in a response to the action. The Chair reiterated a point raised during the IGT177 Workgroup meeting that if a further change to the process is required, a Modification can be raised at a later date.

The Panel considered discussions had by the IGT UNC Workgroup debating potential costs incurred as a result of IGT177. The majority of Panel members agreed with the Workgroup that IGT177 will not result in costs and that any future costs to the service as a result of UNC0908 will be related to UNC0908 only. A Panel member disagreed with this view, noting that this Modification will retain the service that UNC0908 will be removing. Another member acknowledged the views of the other member and asked the member to consider what additional costs might be incurred following the implementation of this Modification on its own as they did not feel there would be any, reiterating previous views made.

The Panel member who disagreed considered whether it was instead a timing issue with the implementation of the Modifications, as a result of the way the CDSP deals with the cost of services. They determined that if IGT177 is implemented before UNC0908 there should be no additional costs but feels there may be costs incurred if it is not implemented before.

The Panel, having considered the views and discussions of the Proposer and Workgroup, agreed unanimously that there was no further work required by the Workgroup with regards to cross-Code impacts.

## Panel decision (August 2025)

The Panel considered all consultation responses and agreed unanimously that there is no further work required by the Workgroup with regards to cross-code impacts.

## Environmental impacts

No environmental impacts have been identified.

## Workgroup discussions and conclusions (May 2025)

The Workgroup considered the potential environmental impacts of this Modification and agreed that there are none.

## Panel initial views (May 2025)

The Panel considered the Proposer and Workgroup views and unanimously agree that there was no further work required by the Workgroup with regards to environmental impacts.

## Panel decision (August 2025)

The Panel considered all consultation responses and unanimously agree that there was no further work required by the Workgroup with regards to environmental impacts.

# 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 <ul style="list-style-type: none"> <li>(i) the combined pipe-line system; and/or</li> <li>(ii) the pipe-line system of one or more other relevant gas transporters</li> </ul>                                                                                       | None              |
| (C) Efficient discharge of the licensee's obligations                                                                                                                                                                                                                                                                     | None              |
| (D) Securing of effective competition: <ul style="list-style-type: none"> <li>(i) between relevant shippers;</li> <li>(ii) between relevant suppliers; and/or</li> <li>(iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers</li> </ul> | 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

## Proposer's rationale

### (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.

### Workgroup discussions and conclusions (May 2025)

A member referenced Objective (F) and noted that there has been some debate across Codes around how this Objective should be applied. However, they feel that the rationale provided by the Proposer is a good example of the benefits under this Objective. They feel that from a pure Code perspective, what the IGTs are seeking to do here is exert their right to maintain an element of Code and specifically move it within the IGT UNC in light of UNC0908 and the potential consequences.

They noted the Proposer's rationale and the point specifically stating that “*IGTs will continue to operate as a backstop to improve settlement, in undertaking Meter Reads which have been missed*”. They feel that this may be a stretch so far as how it fits within Objective (F), as this element of their rationale may only be realised if UNC0908 is implemented. However, they do feel that the Modification still has a positive impact on Objective (F).

Some Workgroup members agreed with this view. The Workgroup agreed that IGT177 has a positive on Objective (F).

### Panel initial views (May 2025)

The Panel considered Proposer and Workgroup views and unanimously agreed in line with their views that IGT177 has a positive impact on Objective (F).

### Panel decision (August 2025)

The Panel considered all consultation responses and agreed unanimously that IGT177 will have a positive impact on Objective (F) in line with the rationale above.

## 8 Implementation

### Implementation approach

IGT177 is proposed to be implemented 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 Code Administrator will look to implement this Modification 5 Working Days after the closure of the 15 Working Day appeal window.

## Proposer's suggested approach

The Proposer recommend that the Modification be 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.

## Workgroup discussions (May 2025)

The Workgroup considered the discussions and conclusions on the Modification overall and the view that the Modification should proceed as a Self-Governance Modification Proposal.

The Code Administrator asked for views on the implementation in light of UNC0908 and whether the Modification should be implemented as part of an Extraordinary Release or as part of the next available scheduled Release, which would be November 2025.

The Proposer suggested that, on consideration of the potential dependencies on UNC0908 implementation, that IGT177 should be implemented as part of an Extraordinary Release.

The Code Administrator confirmed that, as the legal text as written is not complex, it would be able to accommodate the Extraordinary Release but that it would be subject to the usual 15 Working Day Appeal Window.

## Workgroup conclusions (May 2025)

The Workgroup unanimously agreed that IGT177 should be implemented 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.

## Panel initial views (May 2025)

The Panel considered the Proposer and Workgroup views, with a Panel member asking why the Modification needed to be implemented as part of an Extraordinary Release rather than waiting to see what happens with UNC0908.

Another Panel member responded, noting that the rationale for the implementation approach was that IGT177 is a standalone Modification, and the next available scheduled Release is not until November 2025. If UNC0908 were to be implemented before this Release it may result in a misalignment in governance.

A Panel member asked what might be needed should UNC0908 not be implemented and questioned whether there would still be a need for IGT177. Another Panel member responded that there would be no adverse impacts of having the “must read” governance in both the IGT UNC and the UNC, making reference to other instances with the Codes where this is also the case.

A Panel member asked whether IGT177 creates a dual governance issue and whether that had been a consideration of the Workgroup. A Panel member responded that IGT177 would not cause a dual governance issue and that there are other shared processes that are written out in both Codes, so this Modification is not introducing a new precedent or a dual governance issue. The Code Administrator agreed noting that there are aspects of the “must read” process that are different for IGTs and so this would further add to that.

The Panel, having discussed the views of the Proposer and the Workgroup, unanimously agreed with the proposed implementation approach as set out above.

## Panel decision (August 2025)

The Panel considered all consultation responses and agreed unanimously with the proposed implementation approach as set out above.

## 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 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

All drafts and approved legal text changes can be found in the legal text documentation on the [IGT177 webpage](#).

### Workgroup discussions and conclusions (May 2025)

The Workgroup considered the draft legal text provided by the Proposer.

A member asked the proposer to confirm that the intent of the Modification is to simply take what is currently referenced within the UNC and put it into the IGT UNC. The Proposer confirmed that this was indeed the intent of the Modification. The member had no further questions or comments.

The Workgroup agreed that the legal text provided delivered the intent of the solution.

### Panel initial views (May 2025)

The Panel considered the Proposer and Workgroup views, as well as the draft legal text, and agreed that no further work was required and that the draft legal text delivers the intent of the solution.

### Panel decision (August 2025)

The Panel considered all consultation responses and agreed unanimously that no further work was required and that the draft legal text delivers the intent of the solution.

## 10 Consultation

Panel invited representations from interested parties by 21<sup>st</sup> July 2025. The summaries in the following table are provided for reference on a reasonable endeavours basis only. The Code Administrator recommends that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

## Representations were received from the following parties:

| Organisation             | Response | Relevant Objectives | Key Points                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------|----------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BUUK                     | Support  | F – Positive        | <ul style="list-style-type: none"> <li>• Support the implementation of the Modification, noting it 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.</li> <li>• Agreed with Self-Governance.</li> <li>• Agreed with views that IGT177 will have a positive impact on Objective (F).</li> <li>• Do not see an expected cost associated with IGT177.</li> <li>• Support the implementation approach and agree that IGT177 should be implemented as part of an Extraordinary Release.</li> <li>• Agree that the legal text delivers the intent of the Modification.</li> <li>• Noted that IGT177 does not look to introduce the “must reads” process into Code, but looks to maintain its presence under the IGT UNC, and with that the existing benefits the “must read” obligation brings. 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.</li> </ul> |
| Indigo Pipelines Limited | Support  | F – Positive        | <ul style="list-style-type: none"> <li>• Support the implementation of the Modification. Though they noted that whilst they 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 applies to Large Transporters, it is not clear to us that all IGTs will wish to retain an obligation that Large Transporters no longer have.</li> <li>• Agreed with Self-Governance.</li> <li>• Agreed with views that IGT177 will have a positive impact on Objective (F).</li> <li>• Agree that IGT177 on its own does not add any additional costs or impact existing procedures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

|  |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--|--|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  |  | <p>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.</p> <ul style="list-style-type: none"> <li>• Support the implementation approach and agree that IGT177 should be implemented as part of an Extraordinary Release.</li> <li>• Agree that the legal text delivers the intent of the Modification.</li> </ul> |
|--|--|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Summary of responses

There were 2 responses to the IGT177 consultation, both were from IGTs.

It is recommended that all consultation responses are looked at individually. All responses to the IGT177 consultation can be found [here](#).

## Governance

All respondents agreed that the Modification should be treated as a Self-Governance Modification Proposal.

## Support for implementation

All respondents supported the implementation of the Modification.

## Relevant Objectives

All respondents agreed that the Modification would a positive impact on Relevant Objective (F), with views in line with the Proposer and the Workgroup.

## Legal text

All respondents agreed that the Legal Text delivers the intent of the Modification.

## Implementation

All respondents agreed with the implementation approach.

## Impacts and costs

All respondents agreed that IGT177 will not result in direct costs to industry. Thought it was noted by one respondent that, 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.

## Panel decision (August 2025)

A Panel member noted a comment raised by a respondent saying that should UNC0908 be implemented, IGTs may incur costs as a result of being the sole user of the CDSP process. The member indicated that Shippers also engage with the process and therefore the statement of IGTs being the sole user is incorrect.

The Panel agreed that there may be impacts under the UNC Modification and that these may fall on Shippers as well as IGTs.

The Panel considered all consultation responses and agreed unanimously that no further work was required on this Modification and no new issues had been raised.

## 11 Panel Discussions and Determinations

### Panel discussions

Discussion with regards to Panel decisions can be found in the relevant sections of this FMR.

### Panel determinations

The Panel considered the IGT177 FMR and **unanimously agreed**:

- that IGT177 does not have an impact on any SCRs or other significant industry projects;
- that IGT177 is a Self-Governance Modification Proposal;
- that Impacts and costs set out in the report are accurate and appropriate, and they had nothing new to add;
- that IGT177 will have a positive impact on Objective (F);
- with the proposed implementation approach;
- that the IGT177 solution delivers the intent of the Modification; and
- that the legal drafting delivers the intent of the solution.

The Panel **unanimously agreed** that:

- that IGT177 should be implemented.