

Consultation Response

IGT178: PC4 Read Submission Window Extension

Responses invited by: 20 October 2025

Respondent Details

Name: Cher Harris

Organisation: Indigo Pipelines Limited

Support Implementation ☒ X

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We agree with the Proposer that IGT UNC should be re-aligned with UNC in regard to the Read Submission Window, to maintain a consistent approach across both Codes. This will make it easier for Parties to understand and comply with the rules.

The extension to the Read Submission Window is expected to increase the volume of meter readings submitted, which should have a positive impact on Settlements and UIG, and decrease the burden of 'Must Read' site visits.

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 should be treated as requiring Authority Consent, to align with the approach taken for related Mod UNC0884

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 maintaining a consistent approach across the two Codes, making it easier for industry parties to understand and comply with their obligations

Impacts and Costs

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

None identified

Implementation

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

We agree with the Proposer's suggestion that this Modification only be implemented if UNC0884 is implemented, and the implementation dates should align as close as possible

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