

Consultation Response

IGT178: PC4 Read Submission Window Extension

Responses invited by: 20 October 2025

Respondent Details

Name: Helen Gilbert

Organisation: National Energy System Operator (NESO)

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

NESO supports the proposed modification as it primarily aligns the Independent Gas Transporters Uniform Network Code (IGT UNC) with the forthcoming implementation of UNC0884. This alignment facilitates the extension of the submission window for Class 4 Supply Meter Point (SMP) reads beyond the current deadlines of the 10th and 25th Supply Point System Business Days (SPSBD). By introducing further staggered targets, additional read submissions will be permitted up to the 45th and 80th SPSBDs, with the recognition that for non-domestic sites, submissions are only allowed up to the 45th SPSBD.

The harmonisation of these codes helps to prevent any non-compliance or contradictions between the IGT UNC and UNC. Additionally, providing parties with extended timeframes for submitting Class 4 reads will enhance settlement accuracy and reduce the obligations for "must read" scenarios, thereby decreasing the volume of Unidentified Gas (UIG).

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?

NESO concurs with this being an Authority Direction Modification, as UNC0884 has been determined as such and because of the 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.

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

None

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

(F) Promotion of efficiency in the implementation and administration of the Code

NESO agree that the Modification has a positive impact on (F), as the alignment between IGT UNC and UNC ensures a uniform approach across the two codes.

Impacts and Costs

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

NESO is not an impacted party to this Modification. We have no comments relating to impacts and costs.

Implementation

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

NESO is not an impacted party to this Modification. We have no comments relating to implementation timeline.

Legal Text

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

NESO are satisfied that the legal text will deliver the intent of the Solution.

Further Comments

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

None

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