

Final Modification Report	At what stage is this document in the process?
IGT178: PC4 Read Submission Window Extension	01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final 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.	
	Panel considered this Modification on 31st October 2025. The Panel agreed unanimously that this Self-Governance Modification Proposal should be implemented.
	High Impact: N/A
	Medium Impact: IGTs, Shippers, Suppliers
	Low Impact: IGT UNC, Consumers, CDSP

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Timeline

Modification 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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Any questions?

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.

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.

Proposer's requested next steps

This Modification should:

- be treated as an Authority Direction Modification Proposal.

Workgroup views and conclusions (September 2025)

The Workgroup considered the Proposer's justification for Authority direction.

The Workgroup agreed unanimously that IGT178 should be treated as an Authority Direction Modification Proposal.

Initial Panel views (September 2025)

The Panel agreed unanimously that IGT178 should continue be treated as an Authority Direction Modification Proposal.

Panel decision (October 2025)

A Panel member noted that the Authority has approved UNC0884. The member questioned whether there is still a need for this Modification to have an Authority decision.

Another member agreed that it was a good point to raise. They suggested that the Panel reassess the Modification and determine if it meets the Self-Governance criteria or not. If it does, and the only reason it's being issued to the Authority is due to its relationship to UNC0884, then it might not be necessary.

The Ofgem representative in attendance advised that each Modification should be assessed on its own merits. If the Modification meets the Self-Governance criteria, the Panel should consider treating it as such.

The Panel reviewed the current Self-Governance Criteria. A Panel member noted that IGT178 would have a positive impact on consumers under the IGT UNC. The Panel considered whether this would be seen as material. A member advised that they did not feel there is a material impact under the Self-Governance Criteria and therefore felt it can be treated as such.

The Panel, having considered all consultation responses and having reassessed the Modification, agreed unanimously that it should be treated as a Self-Governance 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

Proposed 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 with the alignment of the IGT UNC with the UNC.

The suggested solution can be found in the suggested [legal text document](#) associated with this Modification.

Workgroup views and conclusions (September 2025)

The Proposer provided the Workgroup with an overview of the Modification. The Code Administrator also took the Workgroup through the approach to the Proposer's legal drafting to provide further context on the intent of the solution.

A member of the Workgroup agreed with the intent of solution and added that the approach made sense. Another member agreed with this view.

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

Initial Panel views (September 2025)

The Panel agreed unanimously that no further work was required on the solution.

Panel decision (October 2025)

The Panel, having considered all consultation responses, agreed unanimously that no further work was required on the solution.

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 views and conclusions (September 2025)

The Workgroup considered the Proposer's views on impacts on SCRs and other significant industry change projects.

The Code Administrator referenced Energy Code Reform but advised that the impacts on this significant industry change project are not yet known as there is not enough information on the future outputs. The Chair added that as we are further aligning the IGT UNC with the UNC via the cross references it means that the Codes will be easier to merge. It was noted by the Workgroup that the IGT UNC and the UNC will, in future, form a new Gas Network Code (GNC).

The Workgroup agreed unanimously that IGT178 will not impact an SCR or any other significant industry change project.

Initial Panel views (September 2025)

The Panel agreed unanimously that IGT178 will not impact an SCR or any other significant industry change project.

Panel decision (October 2025)

The Panel, having considered all consultation responses, agreed unanimously that IGT178 will not impact an SCR or any other significant industry change project.

Consumer impacts

Proposer's initial views

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	Neutral
Reduced environmental damage	None
Improved quality of service	Positive
Benefits for society as a whole	None

Lower bills than would otherwise be the case:

The Proposer initially indicated, mirroring the discussions of UNC0884, that the change to the read submission window being used in the intended way – to accommodate difficult reads, that there should be a slight improvement in settlement accuracy. However, following Workgroup discussions this was changed to neutral, with a positive impact noted on “Improved quality of service”. See below Workgroup views and conclusions for further information.

Workgroup views and conclusions (September 2025)

The Workgroup considered the Proposer’s views regarding consumer impacts, specifically those seen to be positive against “Lower bills than would otherwise be the case”.

A Workgroup member referenced the Proposer’s rationale regarding positive impacts to “lower bills...”. They advised that while the Modification may improve the accuracy of customer billing, it cannot be confidently said that the impact of the improved accuracy will result in a lower bill as it is possible for a bill to be higher. They added that the impact was more likely to be neutral and that it may lead to an improved quality of service more than guaranteed lower bills.

The Proposer advised that they agreed with the Workgroup Member’s analysis. They confirmed that they were happy to indicate a positive impact on “Improved quality of service” due to the improved accuracy of customer billing and change the impact to “lower bills...” to neutral.

The Workgroup agreed unanimously that IGT178 will have a positive impact on “Improved quality of service”.

Initial Panel views (September 2025)

The Panel agreed with the views of the Workgroup regarding consumer impacts.

The Panel agreed unanimously that there was no further work required with regards to this matter.

Panel decision (October 2025)

The Panel, having considered all consultation responses, agreed unanimously that there was no further work required with regards to this matter.

Cross-Code impacts

The Proposer did not identify any cross-Code impacts. However, they note that 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	☒

Workgroup views and conclusions (September 2025)

The Workgroup considered the Proposer’s views regarding cross-Code impacts.

A Workgroup member asked if referencing a related UNC Modification, but indicating no impact on the Code, was always the approach taken. The Code Administrator explained the different circumstances in which a cross-Code impact would or would not be noted and that it all depends on the effect that an IGT UNC Modification or UNC Modification is expected to have on the other Code. In the instance, the IGT UNC Modification is not expected to have an impact on the UNC or UNC0884. Therefore, the UNC Modification was acknowledged but no impact noted.

The Workgroup agreed unanimously that IGT178 will not have any cross-Code impacts.

Initial Panel views (September 2025)

The Panel agreed unanimously that there was no further required with regards to this matter.

Panel decision (October 2025)

The Panel, having considered all consultation responses, agreed unanimously that there was no further work required with regards to this matter.

Environmental impacts

The Proposer indicated no environment impacts being identified.

Workgroup views and conclusions (September 2025)

The Workgroup noted the Proposer’s view that there are no environmental impacts because of this Modification.

The Workgroup agreed unanimously that IGT178 will not have any environmental impacts.

Initial Panel views (September 2025)

The Panel agreed unanimously that there was no further work required with regards to this matter.

Panel decision (October 2025)

The Panel, having considered all consultation responses, agreed unanimously that there was no further work required with regards to this matter.

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

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.

Workgroup views and conclusions (September 2025)

The Workgroup considered the Proposer's views regarding positive impacts on Relevant Objective (F).

The Workgroup agreed unanimously that IGT178 will have a positive impact on Relevant Objective (F) for the reasons outlined by the Proposer.

Initial Panel views (September 2025)

The Panel agreed unanimously that there was no further work required with regards to this matter.

Panel decision (October 2025)

The Panel, having considered all consultation responses, agreed unanimously that IGT178 will have a positive impact on Relevant Objective (F) for the reasons as set out above.

8 Implementation

Implementation Approach

The Proposer and the Workgroup recommend the following implementation approach:

- IGT178 is implemented as soon as possible;
- IGT178 is implemented in line with UNC0884; and
- IGT178 is only implemented if UNC0884 is implemented.

Proposer's initial recommendation

The Proposer recommended that the Modification is implemented as soon as possible, conditional to the implementation of UNC0884. They 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.

Workgroup views and conclusions (September 2025)

The Workgroup considered the Proposer's initial views on implementation as well as the Code Administrator's suggested implementation approach.

A Workgroup member asked whether it was necessary to have this Modification implemented only if UNC0884 is implemented. They wondered whether there was a need for this and if the IGT UNC should simply cross reference the UNC regardless.

The Code Administrator advised that if UNC0884 was rejected and IGT178 was implemented, the IGT UNC would lose the obligation that currently states that Shippers do not have to pay for a "must read" submitted outside of the agreed settlement window of 25 SPSBD's. The Code Administrator added that what is in the UNC now would automatically apply under the IGT UNC in this circumstance. The Proposer added that this would go against the intent of the Modification which is to align the IGT UNC with the intent of UNC0884.

The Workgroup agreed unanimously agreed with the above implementation approach.

Initial Panel views (September 2025)

The Panel agreed unanimously that there was no further work required with regards to this matter.

Panel decision (October 2025)

The Code Administrator advised that UNC0884 has recently been approved by the Authority. They added that the related Xoserve change ([XRN 5906](#)) is currently targeted for implementation on 27th February 2025. However, this date is subject to change.

The Panel, having considered all consultation responses, agreed unanimously with the proposed implementation approach.

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

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.

Workgroup views and conclusions (September 2025)

The Workgroup reviewed the Proposer's draft legal text changes.

The Workgroup agreed unanimously that the draft legal text delivers the intent of the solution.

Initial Panel views (September 2025)

The Panel agreed unanimously that there was no further work required with regards to this matter.

Panel decision (October 2025)

The Panel, having considered all consultation responses, agreed unanimously that the draft legal text changes deliver the intent of the solution.

10 Consultation

Panel invited representations from interested parties by 20th October 2025. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend 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	- Believe the Modification is simplistic and will aid in aligning the IGT UNC with the UNC via the changes proposed under UNC0884. - Agree the Modification should be Authority Direction. - Agree the Modification has positive impacts on

			Objective (F) as it will align the IGT UNC with the changes to the UNC under UNC0884 and ensures a uniform approach between the two Codes. • No expected development or ongoing costs. • Support implementation approach. • Agree that the legal text will deliver the intent of the Modification. • No new or additional issues raised.
NESO	Support	F - positive	• Believes the Modification aligns the IGT UNC with UNC0884 and the harmonisation of these Codes will help prevent any non-compliance or contradictions between the IGT UNC and the UNC. Further, it would provide extended timeframes for submitting Class 4 reads and will enhance settlement accuracy. • Agree the Modification should be Authority Direction. • Agree the Modification has positive impacts on Objective (F) as the alignment between IGT UNC and UNC ensures a uniform approach across the two Codes. • NESO is not an impacted party and therefore didn't have any comments with regards to costs, impacts and implementation. • Agree that the legal text will deliver the intent of the Modification. • No new or additional issues raised.
Indigo	Support	F - positive	• Believe the IGT UNC should be re-aligned with UNC in regard to the Read Submission Window and to maintain a consistent approach across both Codes. Further, 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. • Agree the Modification should be Authority Direction. • Agree the 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. • No additional costs or impacts identified. • Agree with the proposed implementation approach.

			• Agree that the legal text will deliver the intent of the Modification. • No new or additional issues raised.
Centrica	Support	F - positive	• Believe this Modification as it ensures alignment to the IGT UNC following implementation of UNC0884 and that the IGT UNC is reflective of the increase Read Window across Domestic and Non-Domestic customers. • Agree the Modification should be Authority Direction. • Agree the Modification has a positive impact on Objective (F) as aligning the IGT UNC to the UNC ensures a uniformed approached delivery to parties. • No additional costs or impacts identified. • Agree with the proposed implementation approach. • Agree that the legal text will deliver the intent of the Modification. • No new or additional issues raised.

Summary of responses

There was a total of four responses received to the consultation; two were IGTs, one was from a Shipper, and one was from NESO.

The Code Administrator recommends that all consultation responses are looked at individually. All response to the IGT178 consultation can be found [here](#).

Governance

All respondents agreed that IGT178 should be treated as an Authority Determined Modification Proposal.

Support for implementation

All respondents supported the implementation of the Modification. A summary of rationale is set out below, with full details included in their individual response:

- Will align the IGT UNC with the UNC with the forthcoming implementation of UNC0884.
- Facilitates the extension of the submission window for Class 4 Supply Meter Points (SMP) meaning additional read submissions will be permitted.
- Harmonisation of UNC and the IGT UNC will help prevent non-compliance or contradictions between the two.
- Extended timeframes for submitting Class 4 reads will enhance settlement accuracy and reduce the obligations for “must read” scenarios, thereby decreasing the volume of UIG.
- Maintains a consistent approach across UNC and IGT UNC.

Relevant Objectives

Summary of views against Objectives

Obj.	Positive	Negative	Neutral	Overall View
A	-	-	-	-
B	-	-	-	-
C	-	-	-	-
D	-	-	-	-
E	-	-	-	-
F	4	-	-	Unanimous view is positive
G	-	-	-	-

A summary of respondent's views against the Objectives is below. We encourage readers to review all rationale provided in individual consultation responses.

- **Objective F**
 - Positive: alignment of PC4 read submission window continues the direct referencing between IGT UNC and UNC and ensures uniform approach, making it easier for industry parties to understand and comply with their obligations.

Legal text

All respondents agreed that the legal text delivers the intent of the Modification.

Implementation approach

Three respondents (IGTs and Shipper) agreed with the proposed implementation approach. One respondent didn't have any comments on implementation as they are not an impacted party.

Impacts and costs

Three respondents (IGTs and Shipper) indicated that there would be no direct costs associated with the implementation of this Modification and no new impacts identified. One respondent didn't have any comments on impacts and costs as they are not an impacted party.

Panel discussions and conclusions (October 2025)

The Panel considered all consultation responses and agreed unanimously that no further work is required by the Workgroup, and no new issues had been raised.

11 Panel Determinations

Panel Determinations

The Panel considered the IGT178 FMR and unanimously agreed:

- that IGT178 does not have an impact on any SCRs or significant industry change projects;
- that IGT178 is a Self-Governance Modification Proposal;
- that the impacts and costs set out in the report are accurate and appropriate;
- that IGT178 will have a positive impact on Objective (F);
- with the proposed implementation approach;

- that the IGT178 solution delivers the intent of the Modification; and
- that the Legal Drafting delivers the intention of the solution.

The Panel unanimously agreed that:

- IGT178 should be implemented.

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