

Consultation Response

IGT181: Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers

Responses invited by: 22 June 2026

Respondent Details

Name: Aleksis Butler

Organisation: BUUK

Support Implementation

X

Qualified Support

☐

Neutral

☐

Do Not Support

☐

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

We support the implementation of IGT181 which seeks to align the IGT UNC with the changes implemented under *UNC0854 – Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers*.

Aligning with the changes implemented via UNC0854 will provide IGT Supply Meter Points with the relevant protections which the GDNs currently have.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to this Modification being treated as a Self-Governance Modification Proposal, considering Ofgem's statement on the matter (which can be found in Section 2 'Governance' of the [Draft Modification Report](#))?

We agree with the Modification Panel's determination that the Modification should proceed as Self-Governance. As stated by Ofgem, the Modifications governance can be altered if needed, dependent on issues or concerns raised by respondents.

Priority Category

Do you agree with the Modification Panel's determination with respect to whether or not this Modification should have a Priority Category of Standard?

We agree with the Modification Panel's determination that the Modification should be treated as Standard.

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

No new or additional issues to be considered.

Relevant Objectives

How would implementation of this Modification impact the Relevant Objectives?

We agree that the Modification furthers *Relevant Objective (F) Promotion of efficiency in the implementation and administration of the Code*. The implementation of the Modification will ensure that the original intent of *UNC0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers* is achieved, with the solution now also applying to IGT Supply Meter Points. This means the IGTs would have the same protections, as the GDNs have within the UNC.

Impacts and Costs

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

No costs or expected impact if this Modification was to be implemented.

We note that with the implementation of *UNC0854 – Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers*, XRN5695 was raised, and implemented. The XRN highlighted that there were no costs associated with the implementation of the Modification.

Implementation

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

No lead time is anticipated if this Modification is implemented. The two-phased approach for the implementation of this Modification makes sense, and we support the stages of implementation as suggested in the Draft Modification Report:

- Stage 1: All Stage 1 BRs and legal text to be implemented 1 Working Day following the closure of the 15 Working Day Appeal Window should IGT181 be approved.
- Stage 2: All Stage 2 BRs and legal text to be implemented on or after the implementation of IGT176.

Legal Text

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

We agree with the two-phased approach that has been adopted for the proposed implementation of the Modification, noting the anticipated implementation of *UNC0887 – Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS* and *IGT176 – Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'*.

We believe that this will deliver the intent of the Modification. If the Modification is implemented in two stages, we would recommend that the Legal Text is reviewed by the Code Administrator in relation to Stage 2, to ensure that Clauses in the IGT UNC still point to the relevant Paragraphs in the UNC.

Further Comments

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

No further comments.

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