

Consultation Response

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

Responses invited by: 22 Jun 2026

Respondent Details

Name: Catherine Fearon

Organisation: ES Pipelines Limited

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

As the proposer for this modification, we are supportive of implementation. The implementation of IGT181 ensures the intentions of UNC0854 are applied to IGTs, affording the same protections as for GDNs.

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](#))?

Yes, we agree this should be self-Governance.

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?

Yes.

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?

We agree that the Modification furthers Relevant Objective (F) Promotion of efficiency in the implementation and administration of the Code. This modification will also support code combination in the future.

Impacts and Costs

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

None.

Implementation

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

This modification should be implemented as soon as possible and in line with the two phased approach as discussed in the modification report.

Legal Text

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

Yes.

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