

Consultation Response

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

Responses invited by: 22 Jun 2026

Respondent Details

Name: Cher Harris

Organisation: Indigo Pipelines

Support Implementation	☒
Qualified Support	☐
Neutral	☐
Do Not Support	☐

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

We support implementation of IGT181, as it aligns IGT UNC with UNC, and facilitates the same level of protection for IGTs 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](#))?

We are comfortable with this modification proceeding as Self Governance, following Ofgem's statement

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 that this should be prioritised as Standard

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 supports Objective F, by aligning the IGT UNC and the UNC, and delivering the same level of service to both IGTs & GDNs

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 support the 2-phase approach to implementation proposed in the modification, due to the links to implementation of IGT176.

Legal Text

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

We are satisfied that the legal test will deliver the intent of the modification

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