

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: Helen Gilbert
Organisation: NESO

Support Implementation	X
Qualified Support	☐
Neutral	☐
Do Not Support	☐

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

NESO supports this Modification as it seeks to align the IGT UNC with UNC0854 and extend the application of existing UNC arrangements for Virtual Last Resort User (VLRU) and Contingent Procurement of Supplier Demand (CPSD) to IGT Supply Meter Points. In doing so, it strengthens the framework available to manage system imbalance risk in circumstances where a User becomes subject to UK Government sanctions through the use of a User Premises Termination Notice (UPTN) and associated mechanisms.

The Modification largely mirrors existing UNC arrangements, with the key change being the extension of the Supplier Undertaking, VLRU and CPSD processes to IGT Supply Meter Points through the introduction of the UPTN construct. These processes are already established and understood by industry participants, and rely on existing CDSP services and operational workflows, which should support their practical implementation within the IGT UNC.

NESO agrees with the staged implementation approach, which delivers the core functionality in Stage 1, including the UPTN construct and the activation of Supplier Undertaking, VLRU and CPSD mechanisms, ahead of Stage 2 following the wider structural changes associated with IGT UNC Modification 176 introducing National Transmission System (NTS) Sites to IGT UNC. This allows the primary policy intent of the Modification, namely mitigating imbalance risk in Government sanctions scenarios, to be delivered without unnecessary delay.

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](#))?

NESO acknowledges that the Modification has been raised and progressed on a Self-Governance basis, on the grounds that it is an enabling change intended to align the IGT UNC with UNC0854 and is not expected to give rise to any material impacts. We also note that UNC0854 was approved by the Authority.

However, NESO considers that this Modification should be assessed on its own merits, rather than by reference to a similar change progressed under a different Code. The approval of UNC0854 by the Authority does not, in itself, automatically justify equivalent treatment for an IGT UNC Modification under Self-Governance. At the same time, we recognise the potential duplication of effort that may arise where the Authority is asked to consider a like-for-like change. In those circumstances, we would support a proportionate and light-touch review by the Authority, rather than an unduly burdensome assessment.

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?

NESO agrees with the Priority Category being Standard.

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 agrees that the Modification supports Relevant Objective (F). This is achieved through aligning the IGT UNC with UNC0854 and ensuring consistent application of existing UNC arrangements across both GDN and IGT supply points.

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