

Potential IGT UNC Modification Proposal - Enhanced Transparency and Itemisation of IGT Charges

1. Purpose of the Modification

Centrica are currently considering raising a IGT UNC Modification Proposal related to IGT invoicing.

This is following a recently highlighted issue whereby certain IGT charges may be bundled within invoices in a manner that can make it difficult for Shippers to identify, validate and/or challenge individual cost components. As part of this Modification, Centrica would also like explore the introduction of system based IGT invoicing, considering the UK Governments plans to introduce mandatory e-invoicing for all VAT invoices, starting in 2029.

2. Potential areas of consideration

Centrica suggest that the following be considered as part of this Modification:

- Minimum standards for invoice transparency and charge breakdowns.
- Separate identification of distinct service categories where multiple charge types are included within a single invoice.
- Provision of sufficient supporting information to enable shippers to validate charges.
- Improved processes for dispute resolution where specific charge elements are contested.
- Increased assurance that only appropriate and justifiable costs are passed through to market participants and, ultimately, consumers.
- Introduction of system based IGT invoicing, considering the UK Governments plans to introduce mandatory e-invoicing for all VAT invoices, starting in 2029.

3. Next Steps

The above was presented to Panel on 25th September, who agreed that the information above should be brought to the Workgroup in October for initial discussion.

Centrica are seeking initial feedback from Workgroup Members regarding the scale of the issue noted above, any existing concerns across the market, and the most appropriate governance route to address it.