










Final Modification Report	At what stage is this document in the process?
<h1>IGT145S: Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4</h1>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; width: 100%;">01 Modification</div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; width: 100%;">02 Workgroup Report</div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; width: 100%;">03 Draft Modification Report</div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; width: 100%; background-color: #f4a460;">04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>To create an obligation for Shippers to move Supply Points with low Valid Meter Reading submission performance from Classes 2 and 3 into Class 4, following a consecutive period of poor performance. The CDSP will automatically move any Supply Points not moved by the Shipper in such a scenario (after an allowed period of time).</p>	
	<p>Panel consideration is due on 29th October 2021</p>
	<p>High Impact:</p>
	<p>Medium Impact:</p>
	<p>Low Impact: Shippers, Transporters</p>

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Timeline

Modification timetable:	
Initial consideration by Workgroup	10 September 2020
Amended Modification considered by Workgroup	8 October 2020
Workgroup Report presented to Panel	24 September 2021
Draft Modification Report issued for consultation	27 September 2021
Consultation Close-out for representations	18 October 2021
Variation Request presented to Panel	dd month year
Final Modification Report available for Panel	22 October 2021
Modification Panel decision	29 October 2021

1 Summary

What

Modification UNC 0664VVS was initially developed at Performance Assurance Committee (PAC) and is being monitored by PAC.

Post Nexus delivery Unidentified Gas (UIG) is shared out using weighting factors determined by the Allocation of Unidentified Gas Expert (AUGE), and currently less UIG is apportioned to Class 2 and Class 3 Supply Points than to Class 4 Supply Points. However, poor performance in the obtaining of Valid Readings from Supply Meters at Supply Points in these settlement classes does not improve the situation regarding temporary UIG but hinders it further. The PAC has been monitoring the situation over recent months, and it has become clear that poor performance can continue with no incentive (beyond Uniform Network Code (UNC) breach) to rectify the situation in the short term. For this reason, the PAC is seeking to create additional incentives in this area to ensure Shippers reach and maintain a minimum level of Valid Meter Readings that are submitted to the CDSP for both Classes 2 and 3 as established in the UNC.

Why

At present, while Valid Meter Reading submission performance targets are clearly laid out in the UNC TPD Section M, there is no further incentive to ensure Valid Meter Reading performance reaches a suitable level and is maintained. As it stands, without additional incentives, Shippers are able to move large numbers of sites (with potentially high associated energy consumption) into Classes 2 and 3 and, therefore, reduce their UIG exposure. Whilst reading submission in these classes has improved recently, there remain a number of shippers with significant sized portfolios in these classes who are submitting very low numbers of Valid Meter Readings to the Central Data Service Provider (CDSP) and appear not to be operating effective business processes that meet the requirements of these classes.

How

The solution will create a new IGT UNC cross-reference to the UNC for the changes proposed under Modification UNC 0664VVS which will create an obligation for Shippers to transfer those Supply Points in Classes 2 and 3 where the percentage of Valid Meter Readings obtained from the Supply Meters is below the minimum required standard into Class 4. Valid Reading submission performance will be measured at Supply Point level, with those Supply Points falling below a specified benchmark for a consecutive period being automatically transferred to Class 4. After an allowed period of time, where a Shipper does not move Supply Points that have fallen below the threshold in accordance with the obligation, the CDSP will automatically move those Supply Points into Class 4. There will be no requirement to transfer those Supply Points from Classes 2 and 3 into Class 4 that have had a change of Supplier during the consecutive period where the minimum required Valid Meter Reading standard has not been reached.

2 Governance

Justification for Urgency, Self-Governance or Fast Track Self-Governance

This Modification should follow Self-Governance procedures, as it is only creating a cross-reference to the UNC to enable IGT UNC supply points to be treated in the same manner as UNC Supply Points.

Modification UNC 0664VVS is subject to Self-Governance procedures as it is unlikely to have a material effect on competition in, or commercial activities related to, the shipping, transportation or supply of gas.

Requested Next Steps

This Modification should:

- proceed to Consultation

Workgroup Comments

October 2020 Workgroup Comments

The Workgroup support the proposers view that this should proceed as Self-governance. The Workgroup discussed the difference in approach to the two Modifications. This Modification has a slightly different nuance to UNC0664V as the question being asked in the IGT UNC is whether parties are happy for IGT Supply points to be treated the same as GT supply points under the new rules. The Workgroup discussed that although the two Modifications were on different timeframes, that the group were comfortable that the Panel were being to make a decision on this dependant on the implementation of UNC0664V.

September 2021 Workgroup Comments

Subsequent to the last Workgroup Considerations in October 2020, UNC664VVS changed to Self-Governance and has been passed for implementation by the UNC Panel. The potential risks associated with the two Modifications being considered under different governance has now been resolved. The Workgroup agreed with the Proposers view that IGT145S should proceed as Self-governance as there are no material changes being made in the IGT UNC.

3 Why Change?

It is important for all Supply Points to be treated the same and, therefore, the need to insert a clause into the IGT UNC to reference the changes being made via UNC 0664VVS is imperative to ensure parity.

As a reference the rational for change in UNC 0664VVS is detailed below:

As it stands currently, performance targets for Valid Meter Reading submissions are clearly laid out in the UNC for all settlement classes. The current Valid Meter Reading submission targets for Class 2 and 3 Supply Points as stated in UNC TPD Section M, stands at 97.5% of a Shipper's portfolio for Class 2, and 90% of a Shipper's portfolio per month for Class 3. However, Shippers can benefit from lower UIG weighting factors by moving sites into Classes 2 and 3, but with no incentive or link to minimum levels of Valid Meter Reading submission performance. Without this link, the additional readings available in these classes will not help the temporary UIG situation, but would further hinder it, potentially creating more unreconciled gas in these categories.

Since November 2017, the PAC has been monitoring levels of Valid Meter Reading submissions for Classes 2 and 3 as the post Nexus settlement classes have been taken up by Shippers and there are now some 2.1 million Supply Points currently in Class 3. However, the post Nexus regime is now over two years old, and read submission performance remains poor, despite the CDSP offering and giving support to Shippers to improve meter reading submission levels. Given that this educative approach has not been successful to date, the PAC feels that further incentives are needed in this area to improve read submission levels for the new settlement classes.

Read submission levels (anonymised) are below (as at October 2019) and are included in Modification UNC 0664VVS.

Read Performance as of Oct-19

Shipper Name	PC1	PC2	PC3	PC4-Monthly Read	PC4-Annual Read
Ankara	96.77%	-	-	-	-
Apia	-	-	-	40.00%	95.18%
Baghdad	-	-	-	0.00%	74.56%
Banjul	-	-	90.32%	66.67%	84.98%
Berlin	-	-	0.00%	50.00%	95.31%
Bern	-	-	-	0.00%	95.49%
Bishek	-	-	28.83%	0.00%	75.60%
Bissau	-	-	-	50.00%	-
Bratislava	-	-	-	0.46%	5.71%
Brazzaville	100.00%	100.00%	17.90%	25.46%	93.65%
Bucharest	-	-	87.83%	19.07%	75.46%
Castries	-	-	-	-	96.99%
Dili	-	-	80.00%	36.48%	95.76%
Djibouti	-	-	0.00%	62.13%	94.44%
Dublin	-	-	-	100.00%	96.90%
Gaborone	-	-	-	50.00%	81.50%
Gitega	84.51%	95.21%	76.90%	37.07%	83.80%
Hamilton	-	-	-	28.11%	90.65%
Islamabad	-	-	-	23.27%	96.18%
Kampala	-	-	70.00%	50.00%	83.64%
Kinshasa	-	-	-	44.00%	91.85%
Lisbon	-	-	0.07%	18.38%	87.28%
Luanda	-	58.71%	92.89%	80.72%	84.93%
Luxembourg	-	-	-	28.57%	93.34%
Majuro	-	-	-	72.50%	95.17%
Malabo	-	-	64.17%	79.63%	94.73%
Manama	-	-	9.05%	64.67%	97.05%
Maputo	-	-	-	12.50%	-
Marigot	-	-	-	100.00%	100.00%
Mogadishu	-	-	-	28.57%	84.27%
Monaco	48.39%	-	81.72%	0.00%	-
Monrovia	-	-	-	75.79%	72.75%
Nairobi	-	-	-	50.00%	96.15%
Nassau	100.00%	-	-	-	100.00%
Nuuk	-	-	-	28.95%	97.05%
Oranjestad	-	-	-	27.47%	93.56%
Papeete	88.59%	83.38%	90.44%	75.03%	85.34%
Paramaribo	-	-	-	-	100.00%
Philipsburg	88.99%	70.22%	-	40.58%	92.06%
Prague	-	-	-	26.67%	93.47%
Praia	100.00%	0.00%	78.45%	41.60%	83.80%
Pyongyang	-	-	-	6.67%	16.67%
Quito	-	-	-	53.24%	96.76%
Ramallah	89.00%	0.00%	-	71.21%	95.83%
Reykjavík	80.23%	64.27%	65.32%	93.25%	95.33%
Riyadh	0.00%	-	0.00%	66.67%	93.41%
Rome	93.86%	73.90%	98.47%	88.39%	92.94%
Roseau	-	0.00%	45.24%	62.42%	71.13%
Saipan	92.93%	60.39%	48.39%	74.50%	85.62%
Sarajevo	-	-	-	50.67%	80.02%
Seoul	-	-	80.50%	81.53%	94.28%

Sukhumi	-	-	70.07%	46.94%	88.37%
Suva	-	-	-	-	90.07%
Taipei	-	-	80.35%	39.13%	94.28%
Tallinn	-	-	7.01%	41.39%	92.62%
Tarawa	-	-	-	27.34%	65.66%
Tehran	66.67%	100.00%	-	-	-
Thimphu	100.00%	39.52%	-	88.78%	85.51%
Tiraspol	-	100.00%	-	-	-
Tripoli	-	-	-	0.00%	96.31%
Tunis	-	-	-	83.33%	74.82%
Valletta	66.67%	-	-	66.67%	93.33%
Vilnius	-	-	-	83.28%	92.37%
Warsaw	83.33%	0.00%	-	0.00%	-
Washington	100.00%	53.76%	2.78%	74.60%	88.99%
Industry Total	82.22%	56.21%	52.57%	47.14%	86.95%

The CDSP will be entitled to charge Shippers on a Supply Point basis for all Supply Points that it reclassifies from Classes 2 and 3 to Class 4 on behalf of Shippers in each calendar month. The CDSP will set out the charging rates and invoicing arrangements within the DSC Contract.

The potential benefits of introducing this Modification are below:

SSE Analysis of Costs and Benefits

Table of Unidentified Gas Weighting Factors for Gas Year 2020/21

	Supply Meter Point Classification			
	Class 1	Class 2	Class 3	Class 4
EUC Band 1	0.22	5.28	45.30	120.98
EUC Band 2	0.22	5.28	13.68	117.79
EUC Band 3	0.22	4.93	9.17	15.29
EUC Band 4	0.22	3.87	9.17	11.76
EUC Band 5	0.22	2.47	8.56	8.04
EUC Band 6	0.22	1.13	6.30	4.79
EUC Band 7	0.22	0.33	5.14	2.47
EUC Band 8	0.22	0.22	0.42	1.55
EUC Band 9	0.22	0.22	0.22	0.22

Assumptions

UIG of 4% which equates to a 6% allocation on Class 4 in EUCs 1 & 2.

EUC1 usage is 400 therms (approx.12,000 kWh).

EUC2 usage is 3,500 therms (approx.100,000 kWh).

Price of Gas Is 40p / therm.

Potential UIG Avoidance Calculations Based on the above Assumptions

Multiplying the avoided UIG based on the table by the above assumptions gives the below results:

1. Avoidance of UIG from Class 4 to Class 3 in EUC1 is £6.15 per site. 100,000 sites = £615,000
2. Avoidance of UIG from Class 4 to Class 2 in EUC1 is £9.40 per site. 100,000 sites = £940,000
3. Avoidance of UIG from Class 4 to 3 in EUC2 is £72.38 per site. 10,000 sites = £723,800
4. Avoidance of UIG from Class 4 to Class 2 in EUC2 is £78.32 per site. 10,000 sites = £783,200

The CDSP has confirmed that there are 3.9m sites in Class 3 and also confirmed that the AQ at risk there is 170,000 sites in class 3 where no reads have been provided and noted that the analysis provided is modest and that these costs could be greater. Therefore, the benefits when compared to the costs, could be realised in a matter of months.

4 Code Specific Matters

Reference Documents

UNC TPD Section M <https://www.gasgovernance.co.uk/TPD>

Supplemental Report for Modification 0664

Variation Request for Modification 0664V

5 Solution

Only one IGT UNC business rule is required. The IGT UNC will require a new clause to be inserted in order to enable the IGT UNC to reference the new clause of the UNC created as a result of UNC 0664VVS. Should Modification UNC 0664VVS not be implemented then the proposed changes to the IGT UNC should not be made.

IGT Business Rule

1, In respect to these business rules, the IGT UNC is required to mirror the obligations, requirements and governance being placed in the UNC by Modification UNC 0664VVS in all facets and its implementation is dependent on the implementation of that Modification as well. Consequently the CDSP, PAC and Parties will be able to operate on the assumption that these business rules will apply for all sites (whether under the UNC or IGT UNC) and will be mirrored to ensure that all relevant aspects in this Modification are applied in exactly the same way.

For reference, the Business Rules in Modification UNC 0664VVS are included in section 11 Appendix.

Workgroup Comments

October 2020 Workgroup Comments

The Workgroup agreed that the solution delivered the intention of the Modification.

September 2021 Workgroup Comments

The Workgroup discussed that the solution for UNC664VVS changed in its final iteration and that this has been reflected in the Appendix for IGT145SS (v1.1). The Workgroup discussed that the solution has not changed in IGT145SS since the previous consideration in October 2020. The Workgroup agreed that the solution delivered the intention of the Modification.

6 Impacts & Other Considerations

Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

None identified.

Consumer Impacts

It should be noted that settlement classes do not necessarily correlate to customer products (in that settlement read submission does not necessarily impact the type of product offered to the customer by a supplier). If this were to be the case, non-submission of meter reads could potentially be detrimental to the customer – this Modification seeks to ensure that Shippers are able to appropriately manage the expected performance levels before moving Supply Points into these settlement classes.

However, this will need further consideration by the workgroup as there may be links to customer contracts that the Modification may need to consider.

September 2021 Workgroup further impacts considerations

What is the current consumer experience?

The Workgroup discussed the direction given by the proposer in the original proposal. The Workgroup noted that the Proposers views on Consumer Impacts gave a good summary of the 'Now' and the potential for Read Submissions to be detrimental on the Consumer. It notes the mitigations IGT145S and UNC664VVS would bring into the Codes to help Shippers manage this.

What would the new consumer experience be?

The Workgroup discussed how this Modification may incentivise Shippers to submit Meter Readings to ensure better Settlement accuracy. The Workgroup also discussed how there may be a potential negative impact on customer expectations on self-reads by Suppliers/Shippers. The Workgroup discussed how there were more advantages to this Modification that aids to ensure settlement accuracy and therefore more accurate billing for consumers. The Workgroup also discussed the maintenance of meters (Smart or AMR) which are currently not submitting readings, Suppliers may be incentivised by Shippers and this Modification to ensure those meters are functional again.

Impact of the change on Consumer Benefit Areas

Area	Identified Impact
Improved safety and reliability	Neutral
<p>Lower bills than would otherwise be the case</p> <p>Reallocated UIG in more optimal way. Takes risks away from Shippers in UIG allocation and may be reflected in Supplier Charging. Also positive impact on more frequent reads throughout the year</p>	Potential Positive
Reduced environmental damage	None
<p>Improved quality of service</p> <p>More accurate readings would benefit quality of service to consumer, less contact for requesting reads. Better forecasting for Shippers could improve cost base and may be passed to the consumer</p>	Positive Potential
<p>Benefits for society as a whole</p> <p>Positive, works towards Net Zero by encouraging Smart Meter roll out. More accurate billing helps with network management.</p> <p>Negatives – Moving classes could encourage installation of daily read equipment and may result in less jobs in the sector.</p>	Potential Positive and Negatives

Cross-Code Impacts

This Modification is linked to UNC 0664VVS which this Modification heavily references for parties' information. The development and implementation of this change is exclusively linked to UNC 0664VVS being implemented, therefore, if UNC 0664VVS is not implemented, this Modification would be withdrawn by the Proposer.

UNC	<input checked="" type="checkbox"/>
REC	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input type="checkbox"/>

Environmental Impacts

None identified.

Workgroup Impact Assessment

October 2020 Workgroup Comments

The Workgroup discussed Consumer impacts highlighted in the Modification. The Workgroup discussed whether these Consumer impacts applied to IGT Supply Points in the same way as GDN Supply Points. The Workgroup resolved that the benefits to the IGT UNC would come through the UNC through the billing and settlement charges. There would not be any impact to billing and charging through the IGT UNC. The application of the solution in the UNC would have a positive efficiency impact on the IGT UNC.

The Workgroup also highlighted the efficiency in reporting across various forums e.g. Performance Assurance Committee.

The Workgroup agreed with the other impacts the proposer had identified and had no other comments.

September 2021 Workgroup Comments

The Workgroup discussed a more in depth analysis of Consumer and cross code impacts (Consumer impacts can be seen in the above section). The Workgroup discussed the potential impacts on the REC (as post 1st September 2021 meter reading obligations have now moved over to the REC for gas). The Workgroup did not identify any potential impacts on the REC from IGT145S.

7 Relevant Objectives

Impact of the Modification on the Relevant Objectives:

Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	None
(B) Co-ordinated, efficient and economic operation of (i) the combined pipe-line system; and/or (ii) the pipe-line system of one or more other relevant gas transporters	None
(C) Efficient discharge of the licensee's obligations	None
(D) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers	Positive
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	None
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

This Modification will result in IGT Supply Points being subject to the changes introduced under the UNC by Modification UNC 0664VVS which proposes additional incentives to ensure timely submission of Valid Meter Readings for the relevant classes to be used for settlement purposes and to increase the accuracy of UIG. As such, more accurate and frequent read submission data in central systems should lead to more accurate cost allocation and so, therefore, furthering competition and relevant objective D.

Workgroup Comments

October 2020 Workgroup Comments

The Workgroup agree with the proposers view that this would have a positive impact on Relevant Objective D.

September 2021 Workgroup Comments

The Workgroup reviewed their position in October 2020 and agreed with the proposers view that Relevant Objective D would be positively impacted by this Modification for Shippers and Suppliers. The Workgroup also discussed that there may be potential positive impacts on Relevant Objective F (Promotion of efficiency in the implementation and administration of the Code) as the same rules will now be brought in for both IGT and GDN Supply points. The Proposer noted that this may be the case for many IGT UNC mirror Modifications which align arrangements.

8 Implementation

Will be aligned with XRN 4990 being developed for Modification UNC 0664VVS. Therefore, it is important that the implementation dates for these three changes coincide.

Workgroup Comments

October 2020 Workgroup Comments

The Workgroup agree that all three changes should have linked implementations and that this was estimated as November 2021. The Workgroup noted that the driving factor in implementation is the XRN change proposal and that implementation should be discussed in the DSC Change Management Committee. The Workgroup discussed the possibility of deferring the implementation date at the IGT UNC Panel until the XRN4990 change has been better developed. The Workgroup noted that there should be enough notice from both Code Administrators to ensure industry have enough time to implement the transitional legal text of the change.

September 2021 Workgroup Comments

The Workgroup discussed that at present the UNC Panel had passed UNC0664VVS for implementation, however the driver for an implementation date was still XRN4990 which is still in development. The Workgroup discussed that possible implementation dates have been floated, however, these have not yet been considered fully by the DSC Change Management Committee. The current thinking was for implementation no earlier than November 2022 as these Modifications would be implemented post CSS (Central Switching Service) implementation. The Workgroup agreed that implementation for all three changes (IGT, UNC and XRN) will still need to be aligned.

9 Legal Text

Text Commentary

The revision to the IGT UNC legal text will need to refer to the new clause(s) in the UNC as a result of Modification UNC 0664VVS.

Text

PART E - METER READING

20 Consumption Adjustment

20.1 For the purposes of this Clause 20 the provisions of paragraph 1.9 of Section M of the UNC shall apply with the following changes: The references to “Transporter” shall be interpreted as a reference to “Large Transporter”.

21 Updated Meter Readings

21.1 For the purposes of this Clause 21 the provisions of paragraph 5.16 of Section M of the UNC shall apply:

22 Performance Assurance: Class 2 and 3 Supply Meter Points

22.1 For the purposes of this Clause 22 the provisions of paragraph 5.17 of Section M of the UNC shall apply.

22.2 For the purposes of this Clause 22 the transitional arrangements of paragraph 1.3.8 of PART IIC of the UNC Transition Document shall apply.

Workgroup Comments

October 2020 Workgroup Comments

The Workgroup agreed that the legal text facilitates the intention of the solution.

September 2021 Workgroup Comments

The Workgroup viewed the legal text and agreed with their position in October 2020 that the legal text facilitated the intention of the Solution.

10 Consultation

Panel invited representations from interested parties on 24th September 2021.

The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
Energy Assets Pipelines	Support	F - positive	<ul style="list-style-type: none"> This Modification is supported as it will bring the IGT UNC in line with the UNC, where an equivalent Modification has already been approved and as such ensure that the same rules apply to all supply point regardless of the type of network they are connected to. However it is noted that during the development of this Modification it has changed significantly, as has the mechanism for sharing UIG costs and as such the benefits are now quite limited This Modification should follow the self-governance route It is considered that this Modification would better facilitate Relevant Objective F, by ensuring the same arrangements are in place across both gas codes Changes to central systems by the CDSP will be required. It is understood that these will be funded 100% by Shippers and therefore there will be no additional costs to ourselves as an IGT This Modification should be implemented in line with the changes to central systems by the CDSP
Independent Pipelines Limited	Support	D - positive	<ul style="list-style-type: none"> It is agreed with the proposal that it would be prudent to create additional incentives to ensure Shippers reach and maintain a minimum level of Valid Meter Readings submitted to the CDSP for both Classes 2 and 3, in line with the UNC It is agreed with the Proposer that the Modification positively impacts Objective (D) It is supported that the proposed implementation approach, as noted by the September 2021 Workgroup, to align implementation for all three relevant changes (inclusive of UNC0664VVS & XRN4990)
Indigo Pipelines Ltd	Support	D - positive	<ul style="list-style-type: none"> This Modification has little direct impact on us as an IGT however the principle of introducing

			<p>incentives to improve Shipper meter reading performance and to address UIG is supported</p> <ul style="list-style-type: none"> • It is agreed with the proposer that this Modification should be self-governance as it has no material impact on Code or Code Parties, it merely ensures that IGT supply points are subject to the same incentives as UNC supply Points • It is agreed with the proposer that this Modification has a positive impact on Objective D as improved meter reading submission performance will lead to more accurate cost allocation and settlement • IGT145 is associated with UNC 0664VVS & XRN 4990, and should aim to align implementation as far as practicable • The proposed legal text meets the objectives of the Modification
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Summary

Three responses were received to the consultation for IGT145, all of which were from Pipeline Operators and none from a Pipeline User;

All three respondents offered full support for the Modification and agree it is a self-governance Modification;

Two agreed this Modification met the Relevant Objective D (Securing of effective competition) and one respondent agreed that it met the Relevant Objective F (Promotion of efficiency in the implementation and administration of the Code);

It was agreed that the implementation should be aligned with the equivalent UNC Modification UNC 0664VVS & XRN 4990 - Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4;

All respondents were satisfied that the proposed legal text meets the objectives of the Modification;

One respondent noted that during the development of this Modification it has changed significantly, as has the mechanism for sharing UIG costs and as such the benefits are now quite limited.

11 Panel Discussions

Discussion

Consideration of the Relevant Objectives

Determinations

12 Recommendations

Panel Recommendation

Members recommended:

- that Modification 145 should be implemented
- that the effective date for implementation of Modification 145 should be aligned with that of UNC 0664 VVS Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4.