

Final Modification Report	At what stage is this document in the process?
<p><b>iGT092 iGT092A:</b>  <b>Implementation of Non-effective days for Project Nexus</b>  <b>Implementation [Maintaining a minimum of two Supply point system Business days] (Project Nexus transitional modification)</b></p>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;">01 Modification</div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;">02 Workgroup Report</div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;">03 Draft Modification Report</div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px; background-color: #f4a460;">04 Final Modification Report</div> </div>
<p><b>Purpose of Modification:</b>            These Modification Proposals identify arrangements relating to the requirement for ‘non-effective days’ to enable an orderly and efficient transition from current iGT UNC arrangements to the iGT UNC and subsequent UNC regime identified within iGT UNC Modification 039 and subsequent UNC Modifications 0432, 0434 and 0440</p>	
	<p>Panel consideration is due on 15 February 2017  <i>(delete as appropriate following Panel’s decision)</i>            The Panel recommends implementation <i>(or)</i>            The Panel recommended implementation of</p> <ul style="list-style-type: none"> <li>• Modification iGT092</li> <li>• Modification iGT092A</li> </ul>
	<p><i>(delete as appropriate following Panel’s decision)</i>            The Panel does not recommend implementation <i>(or)</i>            The Panel did not recommended implementation of</p> <ul style="list-style-type: none"> <li>• Modification iGT092</li> <li>• Modification iGT092A</li> </ul>
	<p>High Impact:            Independent Gas Transporters and Pipeline Users</p>
	<p>Medium Impact:            None</p>



Low Impact:  
None

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## Timeline

### Modification timetable:

Initial consideration by Workgroup	6th December 2016
Amended Modification considered by Workgroup	5th January 2017
Workgroup Report presented to Panel	10th January 2017
Variation Request presented to Panel	10th January 2017
Draft Modification Report issued for consultation	13th January 2017
Consultation Close-out for representations	3rd February 2017
Final Modification Report available for Panel	8th February 2017
Modification Panel decision	15th February 2017



**Any questions?**

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## 1 Summary

**Note the following Summary and Solution Sections are taken from the latest version of the iGT092 Modification (v3). Also included are the details where iGT092A differs to the iGT092 modification. These differences are shown in RED.**

### What

To enable a smooth and efficient transition to the new supporting systems it is necessary to set out terms within the iGT UNC and UNC Transition Document which identify the dates when iGT systems and the UK-Link System will not be available for normal transactions and processes as identified within the iGT UNC. This modification identifies when the relevant iGT systems would be taken off-line or subject to additional support measures impacting transaction processing.

### Why

As part of the UK-Link Replacement programme, iGT UNC Modification 039 and subsequent UNC Modifications 0432 and 0440 will be implemented on Project Nexus Implementation Date (PNID). As a consequence, some elements of iGT systems and the UK-Link system will not be available for a period of time to enable critical activities such as migration and recovery to be supported. Clarity in respect of the above would facilitate a smooth, transparent and efficient implementation of the UK Link System and transition for interfacing systems in other industry participants' estates.

### How

This modification addresses required changes to the iGT UNC and identifies a series of 'non-effective days' when the relevant systems would be taken off-line. Separate modifications (UNC 0602 & 0602A) are being raised to address the issue of 'non-effective days' within the UNC and 'variant non-Business Days' when UK Link Systems shall be subject to additional support measures impacting transaction processing

## 2 Governance

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

Self-Governance procedures are not requested as this Modification is expected to have a material; impact on the switching process affecting consumers'. The implementation of non-effective days would amend the Supply Point transfer timescales pertaining to Pipeline User registration. Note: The UK-Link Programme (Project Nexus) Transition Progress Group (TPG) will consider the detailed transitional systems planning activity that will be detailed in the Low Level Transitional Design (note: This group does not meet under UNC governance.) It is proposed that the Distribution Workgroup develop the UNC modification in parallel with this activity. This modification does not meet the criteria for Fast Track Self Governance. Urgent procedures are not requested.

## Requested Next Steps

This modification should:

- proceed to Consultation

The iGT UNC Modification Workgroup have developed the iGT UNC Modification in parallel with activity under the development of the UNC Modification 0602 & 0602A.

**Note: The UK-Link Programme (Project Nexus) Transition Progress Group (TPG) will consider the detailed transitional systems planning activity that will be detailed in the Low Level Transitional Design (This group does not meet under UNC governance). It is proposed that the Distribution Workgroup assesses the UNC modification in parallel with this activity. It is further recommended that the assessment occurs in parallel with proposed changes to iGT UNC (iGT UNC Modification 092 refers).**

## 3 Why Change?

A number of iGT UNC non-effective days and variant non-Business Days are required to facilitate 'cutover' to the new systems being introduced by the Transporters Agency, Xoserve, under the UK-Link Replacement Programme; this proposal is a refreshed version of iGT UNC Modification 082.

For the purposes of clarity, it is important to distinguish a non-effective day and the variant non-Business Day from a non-Business Day.

- A non-Business Day is not specifically defined within the iGT UNC but has the same meaning as is reflected within the exceptions described within the UNC TPD Sections G1.10 - i.e. those Days which are other than a Business Day. Pipeline Users may continue to submit Supply Point Administration (SPA) files on non-Business Days but any such files would not be processed. In contrast, all UK-Link systems activity concerned with TPD Sections G and M, as referenced in iGT UNC following implementation of Modification 039, in particular that associated with updates to the Supply Point Register are typically suspended on a non-effective day.
- A non-effective day is a day during which files to update and maintain the Supply Point Register and for supply point administration activities cannot be submitted

To enable implementation of the UK-Link Replacement Programme in line with the revised PNID of 1st June 2017 it is essential that a number of non-effective days are introduced to the iGT UNC. For information, a number of variant non-Business Days will also be introduced to the UNC Transition Document (via the UNC modification 0602 & 0602A). These will apply to the processing of relevant submitted supply point administration files for iGT Supply Points on and post PNID in the same way that they will apply to Large Transporter Supply Points via the references in the iGT UNC to UNC processes, which are introduced by iGT039. As such, variant non-Business Days are not a specific requirement for this modification but will need to be considered by Shippers and iGTs when looking at impacts on the Supply Point Administration processes.

Extension of the timescales relating to Supplier switching may impact the consumer experience. The certainty that is afforded by the establishment of non-effective days (and variant non-Business Days) mitigates any risk of confusion or misunderstanding with respect to the switching process.

The absence of the clarity that this modification would provide could adversely affect timely implementation of the UK Link Replacement Programme at PNID.

iGT092A - It is proposed that a minimum of two (2) Supply Point System Business Days is maintained to provide suppliers sufficient time to manage their objections processes for those customers where a Shipper objects at their request. This reduces both the commercial risk to Shippers as well as the risk of some customers needing to be Erroneously Transferred. In addition, this approach would give Shippers the option to use the prior weekend period for the decommissioning of legacy interfaces and the implementation of updated systems.

## 4 Code Specific Matters

### Reference Documents

Detailed planning for systems Transition will take place in the Transition Progress Group (TPG). Papers are available here. (Note: This group does not meet under UNC governance and the link below is provided for information only)

<http://www.xoserve.com/index.php/our-change-programme/uk-link-programme/uk-link-programmeworkstream-updates/uk-link-programme-transition/>

The proposed definition of non-effective days would impact parts CI, CII, CIV, CV, D, E and I of the iGT UNC as referenced by the iGT UNC. As such it is recommended that the iGT UNC Modification Workgroup – whose familiarity with such sections – would be best placed to develop this modification given its members knowledge of the ‘retail’ related elements of the iGT UNC.

## 5 Solution

Modification of the iGT UNC is required to identify and incorporate a number of non-effective days within the iGT UNC. The proposed solution is based on the previous iGT Modification 082 which was raised for a PNID of 1st October 2016. This was itself based on iGT072 raised for the original October 2015 implementation date which was approved by Ofgem but never actually implemented.

It is proposed that nine non-effective days are introduced. For information it is also expected that three variant non-Business Days will be introduced into the UNC via the UNC Modification 0602 & 0602A.

iGT092A - It is proposed that a minimum of two (2) Supply Point System Business Days is maintained.

### Definition of Non-Effective days

Non-effective days are defined by the modifications that introduce them.

The non-effective day period is proposed to be 23rd May 2017 to 31st May 2017 inclusive based on the setting of PNID as the 1st June 2017. This period of nine non-effective days (PNID-1 through to PNID-9) prior to Project Nexus implementation date would have the following features:

- Such days would not constitute iGT UNC Business Days.
- No Supply Point Confirmations can be submitted on these days.
- No revision of the Supply Point Register can be made.

None of the following Code Communications may be made:

- Agreed Opening Meter Reading;
  - C&D Information;
  - C&D Notification;
  - Capacity Revision Application;
  - Daily Meter Readings;
  - Emergency Contacts
  - Meter Fix Reading;
  - Meter Fit Report;
  - Meter Information Notification;
  - Meter Information Update Notification;
  - Meter Read;
  - Opening Meter Reading;
  - Proposing User's Estimate;
  - Proposing User Read;
  - Revised Meter Reading;
  - Supply Point Confirmation;
  - Supply Point Confirmation Cancellation;
  - Supply Point First Nomination;
  - Supply Point Nomination;
  - Supply Point Objection;
  - Supply Point Offer;
  - Supply Point Reconfirmation;
  - Supply Point Registration;
  - Supply Point Registration Date;
  - Supply Point Registration Number;
  - Supply Point Renomination;
  - Supply Point Second Nomination;
  - Supply Point Withdrawal.
  - Threshold Rate Increase
- No communication (under the Code or any other contract between the Transporters and Users) pursuant to which Transporter would be required to revise the Supply Point Register may be made.

### Definition of variant Non-Business Days – for information only

The period of variant non-Business Days would include the PNID of 1<sup>st</sup> June and the subsequent days that would have otherwise been Supply Point System Business Days being 2<sup>nd</sup> June and 5<sup>th</sup> June 2017. These days would have the following features<sup>1</sup>:

- Such days would not constitute iGT UNC Business Days.
- Supply Point Confirmations can be submitted.

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<sup>1</sup> This will be set out in greater detail in the associated UNC Mod 0602 and is for information only in this modification

- The variant non-Business Days are expected to apply to UNC TPD Sections G and M as referenced by iGT UNC following implementation of iGT039. Communications may be made by Users to Transporters: Supply Point Enquiry, Supply Point Nomination, Supply Point Offer, Supply Point Confirmation, Supply Point Objection, Supply Point Withdrawal, request for Isolation, application to increase or reduce Supply Point Capacity, Amend Supply Point Offtake Rate, Revisions to Annual Quantity or NDM Meter Reading and Meter Information Notifications and Meter Information Update Notifications.
- Communications may be made by Transporters to Users, including response files to the above.

Whilst variant Non-Business Days do not directly appear in the iGT UNC because they only relate to days in June 2016 when Single Service Provision Rules apply and elements of the iGT UNC such as Supply Point Registration point directly to the UNC, they have an impact on the amended timings for the submission of Supply Point Confirmations and are thus reflected in the tables set out below for the extension to Minimum Confirmation Timescales and Consumer impacts.

### Extension to Minimum Confirmation timescales to enable one (two)-day period for Supply Point Objections

During preliminary discussions of this modification, Users have indicated that they would require a minimum of one day with which to raise a Supply Point Objection which could only be accommodated by extending the minimum Confirmation timescale. Without extension of the minimum Confirmation timescale the incumbent User would not have an opportunity to raise a Supply Point Objection.

iGT092A - In addition, Users have advocated the merits of utilising the weekend prior in order to decommission the Legacy UK-Link System interfaces and implement their solutions to interface with the UK-Link System following the UK-Link Programme implementation. In order to achieve this, Users have advocated that the period within which to raise a Supply Point Objection must be at least two Supply Point System Business Days.

The proposal for three variant non-Business Days, in addition to the nine non-effective day period, means that for certain Supply Point Registration Dates the incumbent User would not be afforded a two Supply Point System Business Day period to raise a Supply Point Objection where the proposing User provides the minimum Confirmation timescale as set out in UNC G 2.5.8(b).

iGT092A - The proposal for three variant non-Business Days, in addition to the nine non-effective day period, means that for certain Supply Point Registration Dates the incumbent User would not be afforded a two Supply Point System Business Day period to raise a Supply Point Objection where the proposing User provides the minimum Confirmation timescale as set out in UNC G 2.5.8(b).

For the PNID of 1<sup>st</sup> June 2017, this Supply Point Registration Date range is between 1<sup>st</sup> and 8<sup>th</sup> June 2017 (iGT092A 31<sup>st</sup> May and 9<sup>th</sup> June 2017.)

In order to accommodate this one-day (iGT092A two-day) objection period the minimum Confirmation timescale would need to be extended as follows and this needs to be reflected in the iGT UNC to ensure that any submitted Confirmations complies with the timescales as amended.

iGT092

Supply Point Registration Date	Confirmation submission deadline (normal operation)	Confirmation submission deadline (extended Confirmation timescale)	15 Day Switching (days)	Revised length of Minimum switch period (days)
1 <sup>st</sup> June 2017	18 <sup>th</sup> May 2017	17 <sup>th</sup> May 2017	15	16
2 <sup>nd</sup> June 2017	19 <sup>th</sup> May 2017	17 <sup>th</sup> May 2017	15	17
3 <sup>rd</sup> June 2017	20 <sup>th</sup> May 2017	17 <sup>th</sup> May 2017	15	18
4 <sup>th</sup> June 2017	21 <sup>st</sup> May 2017	17 <sup>th</sup> May 2017	15	19
5 <sup>th</sup> June 2017	22 <sup>nd</sup> May 2017	17 <sup>th</sup> May 2017	15	20
6 <sup>th</sup> June 2017	23 <sup>rd</sup> May 2017	17 <sup>th</sup> May 2017	15	21
7 <sup>th</sup> June 2017	24 <sup>th</sup> May 2017	18 <sup>th</sup> May 2017	15	21
8 <sup>th</sup> June 2017	25 <sup>th</sup> May 2017	21 <sup>st</sup> May 2017	15	19

iGT092A

Supply Point Registration Date	Confirmation submission deadline (normal operation)	Confirmation submission deadline (extended Confirmation timescale)	15 Day Switching (days)	Revised length of Minimum switch period (days)
31 <sup>st</sup> May 17	17 <sup>th</sup> May 2017	16 <sup>th</sup> May 2017	15	16
1 <sup>st</sup> June 2017	18 <sup>th</sup> May 2017	16 <sup>th</sup> May 2017	15	17
2 <sup>nd</sup> June 2017	19 <sup>th</sup> May 2017	16 <sup>th</sup> May 2017	15	18
3 <sup>rd</sup> June 2017	20 <sup>th</sup> May 2017	16 <sup>th</sup> May 2017	15	19
4 <sup>th</sup> June 2017	21 <sup>st</sup> May 2017	16 <sup>th</sup> May 2017	15	20
5 <sup>th</sup> June 2017	22 <sup>nd</sup> May 2017	16 <sup>th</sup> May 2017	15	21
6 <sup>th</sup> June 2017	23 <sup>rd</sup> May 2017	16 <sup>th</sup> May 2017	15	22
7 <sup>th</sup> June 2017	24 <sup>th</sup> May 2017	17 <sup>th</sup> May 2017	15	22
8 <sup>th</sup> June 2017	25 <sup>th</sup> May 2017	18 <sup>th</sup> May 2017	15	22
9 <sup>th</sup> June 2017	26 <sup>th</sup> May 2017	21 <sup>st</sup> May 2017*	15	20

\*In order to ensure that UK-Link may process such transactions consistently the earliest Supply Point Registration Date that may be requested on 19th May 2017 shall be 9th June 2017.

Sample timelines are provided in appendix 1 to illustrate the timeline around a Change of Shipper event and PNID, and the contingency date.

## 6 Impacts & Other Considerations

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

This Modification Proposal impacts the industry programme for replacement of UK-Link systems. This is because it is necessary to make provision in the iGT UNC for activities (such as those associated with Supply Point Administration) where non-availability of iGT systems has a direct consequence for Pipeline Users, Suppliers and ultimately consumers.

It is essential to the success of the UK Link Replacement Programme.

### Workgroup Impact Assessment

The workgroup considered both modifications together with the paper produced to highlight the main differences which can be found in appendix 1. The Main areas discussed are as follows:

092 – offers the benefits of the least disruption to the 21 days switching obligations for Suppliers as these will be impacted on only 3 days across the implementation period. However, this may be a more technically involved system solution requiring industry participants to make changes to processes or systems to manage the changes to the objection window.

092A – offers the benefits of reducing the risk of erroneous transfers by maintaining a minimum of two days' objection window. It also offers a more simplistic approach to implementation as there will be no need to amend systems to cater for the 1-day window. However, this will result in an increase in impacted days from 3 to 6 days where the Suppliers 21 day switching obligations cannot be achieved.

It was noted that erroneous transfers can cause significant increases in workload and processing costs. It was suggested that it might take around 6 weeks to correct an erroneous transfer back to the pre transfer position.

It was noted that should Shippers take systems offline the weekend ahead of 22nd May, this may create an additional backlog of files which need to be processed by central systems once systems go live. This was considered to be a programme issue, although it was confirmed that no additional non variant business days would be required to manage this risk. If suppliers do implement their changes on the weekend before the NEDs begin the extra objection day will allow suppliers to use existing automated objection processes to clear their objections before they implement their changes on the Friday and avoid manual management of objections on the Monday. This reduces the impact on Xoserve, as they will have less to process against what will be potentially in flight supply points on the Monday night before they shut down for the NEDs.

There was some discussion about how the two-day objection window would operate in practice if iGTs operated under their current code requirement to respond to a submitted confirmation within up to 48 hours. It was noted that if the maximum period allowed was used there may be very limited or no opportunity for the current shipper to object. When Xoserve provided the block timetable it wasn't clear that this was not based on the full 48-hour processing timescales therefore not considering iGT processing. Whilst it is understood the majority of iGT domestic CoS processing is fully automated, this is not the case for all. With this in mind the alternate Modification may help in ensuring that there is at least a day during which current shippers may receive the notice and respond with an objection if necessary.

As such the Workgroup noted that it would be to the benefit to all parties if iGTs could ensure they responded to supply point transfer requests as soon as possible.

## Consumer Impacts

This modification proposes a total of nine non-effective days. If the minimum Confirmation timescales are used the incumbent User would not have an opportunity to raise a Supply Point objection; Users have requested a minimum of one day with which to raise any objections. In order to accommodate this objection period, the minimum Confirmation timescale would need to be extended.

With respect to the 1<sup>st</sup> June 2017 PNID, the period where Users may not submit Code Communications shall mean that Users need to submit Confirmations by 22<sup>nd</sup> May 2017 where the Supply Point Registration Date is 9<sup>th</sup> to 14<sup>th</sup> June 2017.

**iGT092A - With respect to the 1<sup>st</sup> June 2017 PNID, the period where Users may not submit Code Communications shall mean that Users need to submit Confirmations by 22<sup>nd</sup> May 2017 where the Supply Point Registration Date is the 10<sup>th</sup> to the 14<sup>th</sup> June 2017.**

This potentially impacts consumers as switches for the Supply Point Registration Date range of 12<sup>th</sup> to 14<sup>th</sup> June 2017 cannot be completed within the timescales set out in Supplier's Standard Licence Condition 14A: 'Customer Transfer' which requires gas suppliers to ensure that customer transfers can take place within three weeks of the contractual cooling-off period ending. Confirmations must be submitted by Monday 22<sup>nd</sup> May 2017 for the above Supply Point Registration Date range.

**iGT092A - This potentially impacts consumers as switches for the Supply Point Registration Date range of 6<sup>th</sup> to 8<sup>th</sup> June 2017 and 12<sup>th</sup> to 14<sup>th</sup> June 2017 cannot be completed within the timescales set out in Supplier's Standard Licence Condition 14A: 'Customer Transfer' which requires gas suppliers to ensure that customer transfers can take place within three weeks of the contractual cooling-off period ending.**

Standard confirmation timings will resume for Supply Point Registration dates of the 15<sup>th</sup> June 2017 onwards.

The following table details the impact of this on the Revised Minimum Lead time for the submission of Confirmations and this needs to be reflected in the iGT UNC to ensure that any submitted confirmations comply with the timescales as amended:

### iGT092

Supply Point Registration Date	Confirmation submission deadline (normal operation)	Confirmation submission deadline (extended Confirmation timescale)	15 Day Switching (days)	Revised) length of minimum switch period (days)
9th June 2017	26 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	15	19
10th June 2017	27 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	15	20
11th June 2017	28 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	15	21
12th June 2017	29 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	15	22

13th June 2017	30 <sup>th</sup> May 2017	22nd May 2017	15	23
14th June 2017	31st May 2017	22nd May 2017	15	24
15 <sup>th</sup> June 2017	1 <sup>st</sup> June 2017	1 <sup>st</sup> June 2017	15	15

## iGT092A

Supply Point Registration Date	Confirmation submission deadline (normal operation)	Confirmation submission deadline (extended Confirmation timescale)	15 Day Switching (days)	Revised) length of minimum switch period (days)
6th June 2017	23rd May 2017	16th May 2017	15	22
7th June 2017	24th May 2017	17th May 2017	15	22
8th June 2017	25th May 2017	18th May 2017	15	22
9th June 2017	26th May 2017	21st May 2017	15	20
10th June 2017	27th May 2017	22nd May 2017	15	20
11th June 2017	28th May 2017	22nd May 2017	15	21
12th June 2017	29th May 2017	22nd May 2017	15	22
13th June 2017	30th May 2017	22nd May 2017	15	23
14th June 2017	31st May 2017	22nd May 2017	15	24
15th June 2017	1st June 2017	1st June 2017	15	15

## Workgroup Impact Assessment

There were concerns raised that consumers may not be able to enjoy the full benefits of switching to a new tariff where 21 day switching obligations cannot be met. In the worst case this impact could be up to 3 days' loss of benefit for an individual consumer. This impact only arises for 092 on a maximum of three switching days, whereas 092A this impact would apply to 6 switching days. Previous analysis suggests this could impact 1,700 or 3,400 consumers (3 and 6 impacted days respectively).

The alternate proposal results in customer switching taking longer than the prescribed 21 days on 6 occasions, which means there is a delay to customer of new tariff realisation, although the group felt the materiality of the customer impact is offset by the low volume of gas consumed during the summer months and the wider customer benefits of facilitating a smooth transition to the new Nexus arrangements.

## Cross Code Impacts

An equivalent modification has been raised to the Uniform Network Code. Modification 0602 & 0602A. This can be found on the Joint Office website or using the link below:

<http://www.gasgovernance.co.uk/0602>

No impacts have been identified to any other Codes.

## EU Code Impacts

None identified.

## Central System Impacts

This modification proposal is essential for the implementation of the Single Service Provision.

## 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	Impacted (see comment below)
(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	Positive
(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 is required to enable implementation of Single Service Provision. The measures identified can therefore be expected to facilitate relevant objective f) 'Promotion of efficiency in the implementation and administration of the Code. The modification will also replace iGT072 provisions that were drafted and approved on the basis of Project Nexus being implemented on the 1st October 2015.

Given that the effect of the Modification would be to extend the timescales for transfer of Pipeline User within the transition period there could be a minor negative effect on competition between Shippers because of a delay to the switching timescales. This Modification therefore does not facilitate relevant objective d) Securing of effective competition between Shipper Users. It should be noted that the overall introduction of Nexus and Single Service Provision will deliver significant benefits to Consumers, which it is believed outweigh any negative impacts caused by the short term above switching delays.

**iGT092A - The modification proposes to maintain a minimum of two days with which to raise a Supply Point Objection in order to reduce the risk to customers that objections cannot be made.**

**Retention of this two-day period affords Shippers the opportunity to manage System Implementations in a manner consistent with other large scale implementations.**

### Workgroup View

The Workgroup supported the statements made in both modifications regarding the impacts on the Relevant Objectives

## 8 Implementation

This Modification should be implemented upon direction and it would be desirable if this Modification were implemented by 1st April 2017, noting that the UNC is planning to implement no later than the 1st March if possible, or earlier to add certainty for all market participants.

### Workgroup View

Whilst the workgroup supports implementation as soon as possible it also seeks to get clarity on the whole process so that the various businesses can continue their planning for cutover to Nexus.

## 9 Legal Text

### Note for information on reading the Legal Text

The (revised minimum lead time) Days that have been used in Appendix CI-3 are based on the current legal text method of determining the earliest possible Proposed Supply Point Registration Date relevant to when a Supply Point Confirmation is submitted.

These “Days” differ to the numbers set out in the Tables earlier in the Modification where the Days relate to the way the 15 Day switching period is calculated which includes the day on which the confirmation was submitted. The impact on where the Confirmation Date has had to be brought forward because of the introduction of Non-Effective Days and variant non Business days has the same effect regardless.

It should also be noted that these changes are only required in the iGT UNC legal text which applies up until the implementation of Single Service Provision on the 1<sup>st</sup> June 2017. The legal text which has been developed under iGT039 for implementation on PNID will not need to contain this text.

Following a Final Review of the Legal Text that was included with both modifications and taking into account comments made at the Workgroup, the iGTs have made a small change to that provided for iGT092 to note that for a confirmation that is submitted on the 17<sup>th</sup> May 2017 for a Supply Point Registration date of the 31<sup>st</sup> May 2017, whilst normal lead times can be applied, the Code process will only create a Single Day on which an Objection may be raised by the incumbent Shipper.

Also the definition for a “Variant Non-Business Day” that was included in the text provided by the raisers of the modification proposals has been removed from this final version of the Legal Text as it is not required to be referenced in the iGT UNC.

### PART CI

12.7 The Proposed Supply Point Registration Date shall be:

(a) Not more than 30 Supply Point Systems Business Days after the Supply Point Confirmation is submitted; and

(b) [Subject to Clause 12.7 \(c\)](#), not less than 14 Days commencing on the Day after the Supply Point Confirmation is submitted unless:

(i) at the time the Supply Point Confirmation is submitted a Supply Point Withdrawal has been submitted by the Existing Registered User in respect of each Existing Supply Point; or

(ii) There is no change in the identity of the Registered User in respect of the Supply Point in which case the Proposed Supply Point Registration Date shall not be less than 4 Supply Point Systems Business Days after the Supply Point Confirmation is submitted.

[\[iGT092\] \(c\)](#) Where the Proposed Supply Point Registration Date is a date between the 1<sup>st</sup> June 2017 and the 14<sup>th</sup> June 2017 (inclusive) then the Proposed Supply Point Registration Date must be not less

than the Revised Minimum Lead Time (as set out in Appendix CI-3) commencing on the Day after the Supply Point Confirmation is submitted.

[iGT092A]: (c ) Where the Proposed Supply Point Registration Date is a date between the 31<sup>st</sup> May 2017 and the 14<sup>th</sup> June 2017 (inclusive) then the Proposed Supply Point Registration Date must be not less than the Revised Minimum Lead Time (as set out in Appendix CI-3) commencing on the Day after the Supply Point Confirmation is submitted.

## Appendix CI-3

### iGT092

Supply Point Registration Date	Confirmation submission deadline (normal operation)	Confirmation submission deadline (extended Confirmation timescale)	Standard Minimum Lead Time	Revised Minimum lead time (days)
31 <sup>st</sup> May 2017	17 <sup>th</sup> May 2017	17 <sup>th</sup> May 2017	14	14*
1 <sup>st</sup> June 2017	18 <sup>th</sup> May 2017	17 <sup>th</sup> May 2017	14	15
2 <sup>nd</sup> June 2017	19 <sup>th</sup> May 2017	17 <sup>th</sup> May 2017	14	16
3 <sup>rd</sup> June 2017	20 <sup>th</sup> May 2017	17 <sup>th</sup> May 2017	14	17
4 <sup>th</sup> June 2017	21 <sup>st</sup> May 2017	17 <sup>th</sup> May 2017	14	18
5 <sup>th</sup> June 2017	22 <sup>nd</sup> May 2017	17 <sup>th</sup> May 2017	14	19
6 <sup>th</sup> June 2017	23 <sup>rd</sup> May 2017	17 <sup>th</sup> May 2017	14	20
7 <sup>th</sup> June 2017	24 <sup>th</sup> May 2017	18 <sup>th</sup> May 2017	14	20
8 <sup>th</sup> June 2017	25 <sup>th</sup> May 2017	21 <sup>st</sup> May 2017	14	18
9 <sup>th</sup> June 2017	26 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	14	18
10 <sup>th</sup> June 2017	27 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	14	19
11 <sup>th</sup> June 2017	28 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	14	20
12 <sup>th</sup> June 2017	29 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	14	21
13 <sup>th</sup> June 2017	30 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	14	22
14 <sup>th</sup> June 2017	31 <sup>st</sup> May 2017	22 <sup>nd</sup> May 2017	14	23

iGT092A

Supply Point Registration Date	Confirmation submission deadline (normal operation)	Confirmation submission deadline (extended Confirmation timescale)	Standard Minimum Lead Time	Revised Minimum lead time (days)
31 <sup>st</sup> May 2017	17 <sup>th</sup> May 2017	16 <sup>th</sup> May 2017	14	15
1 <sup>st</sup> June 2017	18 <sup>th</sup> May 2017	16 <sup>th</sup> May 2017	14	16
2 <sup>nd</sup> June 2017	19 <sup>th</sup> May 2017	16 <sup>th</sup> May 2017	14	17
3 <sup>rd</sup> June 2017	20 <sup>th</sup> May 2017	16 <sup>th</sup> May 2017	14	18
4 <sup>th</sup> June 2017	21 <sup>st</sup> May 2017	16 <sup>th</sup> May 2017	14	19
5 <sup>th</sup> June 2017	22 <sup>nd</sup> May 2017	16 <sup>th</sup> May 2017	14	20
6 <sup>th</sup> June 2017	23 <sup>rd</sup> May 2017	16 <sup>th</sup> May 2017	14	21
7 <sup>th</sup> June 2017	24 <sup>th</sup> May 2017	17 <sup>th</sup> May 2017	14	21
8 <sup>th</sup> June 2017	25 <sup>th</sup> May 2017	18 <sup>th</sup> May 2017	14	21
9 <sup>th</sup> June 2017	26 <sup>th</sup> May 2017	21 <sup>st</sup> May 2017	14	19
10 <sup>th</sup> June 2017	27 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	14	19
11 <sup>th</sup> June 2017	28 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	14	20
12 <sup>th</sup> June 2017	29 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	14	21
13 <sup>th</sup> June 2017	30 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017	14	22
14 <sup>th</sup> June 2017	31 <sup>st</sup> May 2017	22 <sup>nd</sup> May 2017	14	23

**Definitions**

**Sub section introductory text (to be included at beginning of CI, CII, CIV, CV, D, E, I).**

The following provisions of Part [CI] are subject to the Non-Effective Day requirements as set out in Part O.

**Part O<sup>2</sup>**

1.1. In order to enable changes to be performed in respect of iGT Agency Services as set out in IGT039 Use of a Single Gas Transporter Agency for the common services and systems and processes required by the IGT UNC (directed by the Authority on the 11/03/2015) and UNC modification UNC0440 Project Nexus – iGT Single Service Provision (directed by the Authority on the 14th January 2015) , there will be a period of Non-Effective Days during which no updates to the Supply Point Register can be made by the Pipeline Operator.

1.2. For the purposes of paragraph 1.1 a “**Non-Effective Day**” shall be any of the following Days, PNID-9 up to and including PNID-1.

1.3. For the avoidance of doubt, a Proposed Supply Point Registration Date may be a Non-Effective Day.

1.4. Subject to paragraph 1.6 any communication as set out under paragraph 1.7 may not be submitted on any Non-Effective Day.

1.5. Any of the communications listed in paragraph 1.7 which are sent by a Pipeline User to a Pipeline Operator on PNID-10 must be received by the Pipeline Operator before 17:00 hours on PNID-10.

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<sup>2</sup> The introduced new Part has been called Part O and will replace Part N that was set out in the Legal Text for iGT072 which has a status of deferred. If implemented this modification will replace any legal text associated with iGT072. Part O has been used to avoid any confusion with the legal text that will be introduced by iGT039 which introduces a Part N – Pipeline Operator Agency

1.6. Where the Pipeline Operator receives any communications as set out in paragraph 1.7 on either PNID-10 or PNID-11, it must send any communications to a Pipeline User as required under the Code at the latest on PNID-9.

1.7. For the purposes of this Part N, the communications which cannot be sent on a Non-Effective Day are as follows:

- 1.7.1. Agreed Opening Meter Reading;
- 1.7.2. C&D Information;
- 1.7.3. C&D Notification;
- 1.7.4. Capacity Revision Application;
- 1.7.5. Daily Meter Readings;
- 1.7.6. Emergency Contacts
- 1.7.7. Meter Fix Reading;
- 1.7.8. Meter Fit Report;
- 1.7.9. Meter Information Notification;
- 1.7.10. Meter Information Update Notification;
- 1.7.11. Meter Read;
- 1.7.12. Opening Meter Reading;
- 1.7.13. Proposing User's Estimate;
- 1.7.14. Proposing User Read;
- 1.7.15. Revised Meter Reading.
- 1.7.16. Supply Point Confirmation;
- 1.7.17. Supply Point Confirmation Cancellation;
- 1.7.18. Supply Point First Nomination;
- 1.7.19. Supply Point Nomination;
- 1.7.20. Supply Point Objection;
- 1.7.21. Supply Point Offer;
- 1.7.22. Supply Point Reconfirmation;
- 1.7.23. Supply Point Registration;
- 1.7.24. Supply Point Registration Date;
- 1.7.25. Supply Point Registration Number;
- 1.7.26. Supply Point Renomination;
- 1.7.27. Supply Point Second Nomination;
- 1.7.28. Supply Point Withdrawal.
- 1.7.29. Threshold Rate Increase

1.8 For the purposes of paragraph 1.7, a Bulk Confirmation can be sent on a Non-Effective Day.

1.9 To facilitate the provisions of this Part O, the Pipeline Operator shall provide a Portfolio Extract to each Pipeline User by 17:00 on PNID-8 with details of Supply Meter Points processed on PNID-9. The Portfolio Extract shall be issued in either comma separated value or Microsoft Excel spreadsheet format.

## Definitions

### CI 5.6

In this Parts C and Parts D and E any reference to a "Supply Point Systems Business Day" is a reference to a Day other than a Non-Effective Day or a Saturday, Sunday or a bank holiday in England or Wales.

New Definitions in Part M:

**"Project Nexus Implementation Date ('PNID')"** is 1 June 2017;

**"Non-Effective Day"** shall have the meaning in Part O1.2;

**"Revised Minimum Lead Time"** shall have the meaning in Appendix CI-3 of Part CI

## Work Group Comments

The Workgroup understood the legal text set out in both Modifications and believed that it properly delivered the requirements of each respective modification.

However, it was highlighted that for a Supply Point Confirmation for Registration Date of the 31<sup>st</sup> May, whilst the Confirmation may still be submitted under normal minimum lead times, by using minimum timescales the process would only deliver a single Objection Day.

**Note from the Code Administrator:** The Workgroup comments on the Legal Text were based on the Text included with the Modifications. This Legal Text has been amended as above in Section 9 and now reflects these comments.

## 10 Consultation

Panel invited representations from interested parties on 13<sup>th</sup> January 2017. 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
Xoserve (Systems Operator)	092A – Support 092 – Oppose	F - positive	<ul style="list-style-type: none"> <li>Modification 092 cannot be implemented in the UK Link system without negatively impacting the Project Nexus Implementation Date. Modification 092A can be implemented without impact to the Project Nexus Implementation</li> </ul>
npower (Pipeline User)	092A – Support 092 – Oppose	092A - F - positive	<ul style="list-style-type: none"> <li>We believe that both modifications iGT UNC 092 and 092A would deliver the required Non Effective Days and Variant Non Business Days for the successful implementation of Project Nexus on 1st June 2017. However, we feel that there are significant advantages to customers and the successful delivery of the Nexus programme associated with the npower modification of iGT UNC 092A.</li> <li>Although iGT 092A has the consequence of increasing the switching timescales to 22 days for 3 additional days, we believe the wider benefits to customers of reduced erroneous transfers and the reduced risk to implementation for shippers, suppliers and their customers as well as Xoserve, makes iGT UNC 092A the better solution.</li> <li>We would like to see modification iGT 092A implemented by 1st April 2017 or earlier, noting that the UNC is planning to implement no later than the 1st March if possible, to add certainty for all market participants</li> </ul>
British Gas	092A –	092A - F -	<ul style="list-style-type: none"> <li>iGT092A can be supported by the CDSP, IGTs and shippers</li> </ul>

(Pipeline User)	Support 092 – Oppose	positive	<p>without extensive system changes. This is therefore a lower cost solution for the whole industry. This solution does not pose a significant risk to the Project Nexus June implementation. The solution meets the requirement for parties to have at least one day for objections, which will ensure customers are less like to fall into the Erroneous Transfer process. This avoids delays to ET customer switches and reduces shipper ET processing costs. Maintaining two objection days will allow shippers to clear their objections before they implement 'Friday 19th May system changes' and this avoids manual management of objections on the Monday, which makes it easier for Xoserve to process.</p> <ul style="list-style-type: none"> <li>• We believe most parties; including consumers will understand that a smooth transition to a new IT system is a price worth paying, as opposed to a messy transition where the system implementation is further delayed or non-functioning after go-live.</li> <li>• Therefore, on balance considering IGT092 will require industry wide system changes, which will total £m's and the higher ET costs for consumers and shippers, there is a clear business case for IGT092A.</li> </ul>
BU-UK (Pipeline Operator)	092A – Support 092 – Oppose	092A - F - positive	<ul style="list-style-type: none"> <li>• BU-UK support implementation of iGT092A as it positively assists with the transition of business processes during the cutover of Project Nexus. We recognise by maintaining a minimum of two days in which to object, the risk of erroneous transfers is reduced therefore minimising the impact to consumers through the switching process. We recognise the minimum confirmation timescales will need to be extended to accommodate the one-day objection period.</li> <li>• BU-UK note if iGT092A is implemented the two-day objection window may be reduced should the iGTs require the full 48-hour processing time for Change of Supply therefore, shortening the objection window to one day.</li> <li>• We recognise Consumers may be impacted as the switching timescales cannot be adhered to, therefore consequently iGTs may experience higher volume of customer calls.</li> </ul>
First Utility (Pipeline User)	092A – Support 092 – Qualified Support	F - positive	<ul style="list-style-type: none"> <li>• First Utility supports the intentions of both modifications and believes they will fulfil the relevant objectives of the iGT UNC. We are however concerned by the limited objection window defined within iGT 092. The 2-day objection window defined within iGT 092A offers more assurance to shippers that the objections process will operate with limited risk and help ensure erroneous transfers will be kept.</li> </ul>

			<ul style="list-style-type: none"> <li>• We expect to see more Erroneous Transfers through the Non-Effective Day period if iGT092 is implemented. This could have a detrimental impact on consumer confidence in the industry.</li> <li>• We would like to see an immediate decision made to ensure our processes are aligned in readiness for Project Nexus Implementation Date.</li> </ul>
ESPUG (Pipeline Operator)	092A – Qualified Support  092 – Qualified Support	F - positive	<ul style="list-style-type: none"> <li>• ESPUG had originally raised iGT092 modification as a mirror modification of UNC602. ESPUG considers that both scenarios can be supported.</li> <li>• ESPUG believe the relevant objectives have been addressed in iGT092; however, having an additional day for objections (iGT092A) may be beneficial in preventing erroneous transfers.</li> </ul> <p><b>092- Objectives served</b></p> <ul style="list-style-type: none"> <li>• ESPUG believe that objectives (a) and (f) are best served as this is a short term modification to help implement a long term objective for the wider industry, and with less days and risk to the consumer.</li> </ul> <p><b>092A-Objectives served</b></p> <ul style="list-style-type: none"> <li>• ESPUG believe that objectives (a) and (f) are best served as this is a short term modification to help implement a long term objective for the wider industry and also provides greater clarity on objections, arguably reducing the risk to consumers and to PNID.</li> <li>• The comparison highlights that modification 92A would be in the consumers' interest to have.</li> </ul>
E.ON (Pipeline User)	092A – Qualified Support  092 – Qualified Support	F - positive D - negative	<ul style="list-style-type: none"> <li>• We believe there is a high possibility that information prudent to iGT UNC decision making might be identified through the UNC responses due to additional review and information gathering e.g. discussions have continued in regards to iGT migration times. We would therefore request the iGT UNC Panel also considers anything which may be identified after the UNC consultation close out in their determinations.</li> <li>• The further discussions regarding UNC0602/UNC0602A have highlighted concerns in feasibility of delivery of the 2 options and because of this we have concerns the iGT UNC options may not have been provided all the relevant information to confidently support the most appropriate option.</li> <li>• We have concerns the data migration time being utilised within iGT092/iGT092A might not be sufficient to migrate the data within timeframes allotted and we believe there is still a</li> </ul>

			<p>likelihood the timings may require variation.</p> <ul style="list-style-type: none"> <li>• We are also concerned the number of objection days suggested in iGT092/iGT092A will have detrimental customer impacts and mitigations previously offered e.g. Ofgem announcement are yet to be fully outlined.</li> </ul>
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In summary:

- Seven responses were received to the consultation for iGT092/iGT092A, incorporating four responses from Pipeline Users, two responses from Pipeline Operators, and one response from Xoserve.
- All responses offered support or qualified support to the implementation of Alternate Modification iGT092A.
- Four responses noted opposition to the implementation of Modification iGT092, with the remaining three responses offering qualified support.
- Where indicating support, all respondents agreed that the Modifications better facilitated Relevant Objective F) Promotion of efficiency in the implementation and administration of the Code.
- One party noted that the Modifications could negatively affect Relevant Objective D) Securing of effective competition, as a result of anticipated consumer impacts.
- All respondents agreed that the Modifications did not meet the criteria for Self-Governance.
- All respondents agreed that if a decision was made to implement, the Modification should be implemented as soon as reasonably practicable. One party sought implementation no later than 1<sup>st</sup> March 2017, one further party stated a latest preferred implementation date of 1<sup>st</sup> April 2017.
- All respondents agreed that the proposed Legal Text supported the requirements of the solution.

## 11 Panel Discussions

### Discussion

Insert text here

### Consideration of the Relevant Objectives

Insert text here

### Determinations

Insert text here

## 12 Recommendations

### Panel Recommendation [to Authority]

Members recommended:

- that Modification 092/092A should [not] be implemented
- that Modification 0092/092A better facilitates the Relevant Objectives than Modification 092/092A

*The Code Administrator may set alternative subheadings appropriate to the specific Code.*

### Insert subheading here

Insert text here