

IGT039 Meeting #26
FINAL Minutes

Participants:

<i>Dave Bowles (DB)</i>	<i>FPL</i>		
<i>Elaine Carr (EC)</i>	<i>Scottish Power</i>	<i>Kish Nundloll (KN)</i>	<i>ESP</i>
<i>Gethyn Howard (GH) (Chair)</i>	<i>GTC</i>	<i>Kristian Pilling (KP)</i>	<i>SSE</i>
<i>Jonathan Kiddle (JK)</i>	<i>EDF Energy</i>	<i>Kiran Samra (KS)</i>	<i>NPower</i>
<i>Steve Ladle (SL)</i>	<i>Gemserv obo.</i>		
	<i>IGT UNC</i>		

1) Introductions

The meeting attendees introduced themselves. GH confirmed that in line with the previous meeting, the intention of the meeting was to highlight the main areas of change to the legal drafting since the previous 039 meeting and to review the issues log which had been previously circulated. GH also confirmed that a general update on the legal review would be provided and the draft work group report would be reviewed which had been progressed since the last 039 meeting.

2) Review of actions

- 1) JD to undertake further analysis on SSP funding.
See agenda item 6 – carried over
- 2) GH to speak to JD about potential options to progress Xoserve development cost recovery.
- 3) *See agenda item 6 – carried over*
- 4) GH to provide an update on the external legal review following his call with the law firm.
GH outlined that an update had been provided following the call (4th August) but a further update had not been provided until the next steps for the review had been agreed by the AIGT. GH confirmed an update on the current situation would be provided under agenda item 3 - closed
- 5) GH to add a plain English summary to each section.
GH confirmed that SL had provided this and that this would be reviewed under agenda item 4 - closed
- 6) AM to confirm if the .CD file is the correct flow for meter fit report purposes..
Email from AM states “The file referred to serve’s the purpose of the “meter fit” report. It is in the diagram in the BRD. The iGT MAM / iGT advises Xoserve of the meter installation, we send a copy of this file to the Shipper – this is the “meter fit” report for the purposes of your [IGT] charging” – closed¹
- 7) GH to speak to SL regarding the text in F11.1-11.3.
GH confirmed that this discussion had taken place and that the amendments would be outlined under agenda item 4 - closed

¹ Update received from AM afternoon of meeting.

3) General Progress Update

GH confirmed that the plain English summary had been drafted by SL and the skeleton work group report had been fleshed out and would be reviewed under agenda item 8.

GH summarised that the AIGT had appointed an external legal firm to conduct the drafting review. It was confirmed that the original intention was for the review to be split into two week-long parts; the first to review the approach and feedback to the AIGT with the second to make any drafting changes as required. GH confirmed that feedback on the approach had confirmed that the pointing to approach was sufficient but that it did hold the potential for parties to misinterpret the Code requirements as relied to some degree on a base understanding of the IGT UNC and processes. As such the AIGT were considering whether this approach could be built on to provide further clarity on the Code obligations which was expected to be concluded on by August 22nd. This would then allow the external law firm to progress with the second part of the review which was now expected to take a further two weeks from the date the instruction is given to proceed which is expected to be early w/c 25th August. GH confirmed that he would be on leave from 22nd August returning September 1st and would provide a progress update on his return.

4) Legal Drafting Review and Feedback

The group discussed the drafting changes made following the last meeting including a number of amendments made following review on handover to the external law firm. The following tables outline the changes and discussion points for each section of the IGT UNC:

Part B

Para	Update	WG Observation	Response
3.1 & 3.2a	amended drafting from aggregated EUC level to individual supply point level	ok	ok

Section CI

Para	Update	WG Observation	Response
6.2(a)	now refers to infill properties under special condition 1 (allows infill not to use NExA table)	ok	ok
14.5	Amended IGT Arrangements Document ref to IGTAD	ok	ok

Section CIII

Para	Update	WG Observation	Response
1.2	Hadn't changed this in previous drafts but have amended 2 refs from NExA to IGTAD under para 1.2	ok	ok

Section E

Para	Update	WG Observation	Response
1.2	Added new Transporter carve out	ok	ok

1.3	New para 1.3 as we previously had this in another section but removed it. It refers to “metering general” in the UNC so is needed and we did have “transporter” carve outs for this under para 1.2 so looks like we forgot to add it back in to the text.	Should this refer to Section E rather than just Clause 1.3?	GH to pick up with lawyers
7.2	to clarify a Shippers are to provide IGTs with class 1 reads	ok	ok
3 onwards	Para numbering issue fixed	ok	ok
14	Para 14 (opening meter reads) has new para to replace one in the UNC regarding User Pays	ok	ok
17.2	changed marking cleaned up regarding LDZ CSEP Ancillary Document	ok	ok

Section F

Para	Update	WG Observation	Response
11.1 & 11.2	removed as no longer required	Remove “smaller” from drafting so applies to all supply points	GH to amend drafting
11.3 & 11.4	amended to refer to individual rather than aggregated supply point process	ok	ok

Section M

Para	Update	WG Observation	Response
	Meter read frequency definition added back in as appears in IGT UNC	ok	ok
	Pipeline Operator Agency and Pipeline Operator Agency Activities added in as are outlined in Part X	ok	ok
	User EUC CSEP removed as no longer used	ok	ok

Section X

Para	Update	WG Observation	Response
	This is based on TPD V6.5 so have updated the references and terminology to set out what services the SSP will do for IGTs.	ok	ok

With regards to “Section X”, GH confirmed that this was a copy and paste of V6.5 from the UNC and had been amended to

- update UNC terms to IGT UNC terms
- amend relevant references to parts of the IGT UNC
- remove any processes that the agency will not undertake for IGTs.

There were no comments or issues raised with the drafting.

GH confirmed that the drafting that had been provided for meeting #26 was that which had been provided to the AIGT's external law firm. As such, it was not expected that there would be a substantial deviation from the drafting and that if parties wanted to use this "baseline" to bring colleagues up to speed on the work, it would serve such purpose.

An overview was provided of the plain English summary which SL had drafted. It was outlined that the text will not form part of the Code and exist as a pretext to outline how the Code was drafted, the background to SSP and how the Code was to be interpreted. GH highlighted that the current drafting had two alternate final paragraphs which differed in terms of using the UNC and IGT UNC terminology when describing how to read the IGT UNC. GH suggested the latter paragraph may be preferable on the basis that the text is describing how to read the IGT UNC and as such, the use of IGT UNC terms may be desirable for consistency. It was noted however that should the more detailed drafting approach be taken forwards a different paragraph may be used to explain how to read the IGT UNC. The group agreed that there were no alterations to be made to the drafting at this stage.

Action – GH to review drafting with lawyers for E1.3.

GH to amend drafting to remove smaller under F11.1

5) Progressing Changes to Ancillary Documents

It was noted that changes will be required to most (if not all) of the ancillary documents, a number of which are outlined in the draft work group report. GH suggested that several documents required changes which could not necessarily be determined at present (such as specific file formats for new data items such in the portfolio extract or query file formats for SoS) and suggested that the review of each ancillary document is taken forwards outside of the IGT039 modification. It was suggested that all areas that will require review would be recorded in the work group report (as currently drafted) which would provide a formal record of further work to be carried out outside of IGT039. SL commented that it is likely there would be a number of additional ancillary documents which would be impacted in addition to those currently listed and GH agreed to review these to outline the documents which would require further review. The group agreed with this approach on the basis that it would allow the IGT039 modification to conclude and go to consultation with minimal delay.

GH agreed to create an overview document which would provide a framework for the Shipper work group to conduct its review on the basis that this hadn't originally been provided for the SoS review and consequently the work took longer than anticipated to start as the scope was unclear.

Action – GH to draft overview of review requirements for ancillary documents to be reviewed and amended outside of IGT039 and list in work group report.

6) Update on Funding Issues

During the review of actions, GH confirmed he received an update from Jon Dixon (JD) on the funding matters. GH confirmed that JD had explained that the update was to be provided as close to the meeting as possible to ensure its accuracy as much of the work was ongoing. This has been set out in this section for clarity. The headlines from JD's email are as follows:

- Work on the methodology for determining the iGT contribution on demonstrable RPC funding is ongoing.
- This will cover the day to day operational costs of SSP only – and for an anticipated 6 months until FGO is implemented.
- It is considered that modifications are highly unlikely to be implemented in this period, unless they are necessary 'fixes' to Nexus which we would likely consider to have already been funded. Anything genuinely new to SPA will almost definitely be a shipper driven User Pays service. It is unlikely that such a 'new' mod would be implemented in the 6 month interim period, so we feel could appropriately be captured under the funding arrangements to emerge from FGO – i.e. we don't believe there is a need to create a User Pays mechanism at this stage to recover mod costs for iGTs.
- That consultation for the IGT licence condition and associated funding methodology is now slipping into Sept, but cannot be any later as we want to make decisions on the licence mod, UNC440 and UNC467 before the end of Oct to meet critical date on Xoserve's planning.

KS queried whether it was expected for the funding aspects to be agreed before IGT039 is sent to consultation. It was agreed that this would be necessary in order for parties to be aware of the cost implications on their businesses which would form an important aspect of their consultation responses to IGT039.

7) Review of Issues Log

GH ran through the issues log outlining the areas that had been progressed since the last IGT039 meeting. JK queried the provision of SOQ as outlined in CI 2.2 of the log and confirmed that this was a required field in the invoice backing data file format for RPC supply points. GH commented that the feedback received had suggested that not all IGTs actively store this data item which indicated that it may be derived and that feedback provided indicated that a backfill exercise to store the figure was not desirable. GH agreed not to close the issue on the log and it was suggested that the issue being a current issue, could be discussed at the next Shipper work group meeting and a modification raised if deemed appropriate to resolve the issue ahead of SSP (or to be implemented at the same time). KS agreed to draft an overview paper of the issue in preparation for the next IGT Shipper work group meeting. The status of the log can be found in Appendix 1 with updated areas highlighted in blue.

Action – KS to draft overview paper of SOQ issue in advance of next IGT Shipper Workgroup meeting.

8) Review of Skeleton Work Group Report

GH provided an overview of the progress made on the skeleton work group report since the last meeting. The main updates could be found in change marked format and mainly fleshed out the existing text by filling in discussions held at previous meetings such as around the various governance approaches that were reviewed. Other new additions to the report were further detail on costs and funding based as taken from the Xoserve pre modification consultation for SSP (which had also been attached as an appendix to the report) as well as providing further detail on work to be taken forwards outside of IGT039, split into that which is and isn't directly related to SSP but was discussed during work group discussions. SL commented that the work group report did not recommend that the modification should proceed to consultation. It was agreed that as the Panel had instructed the work group to undertake the development work and produce the work group report this would be added as a recommendation by the group. GH agreed to add this to the report.

Action – GH to add recommendation in the work group report that IGT039 proceeds to consultation.

9) Next Steps and Work Plan Review:

In terms of next steps, GH confirmed that he expected the AIGT to instruct the external law firm to commence any required drafting changes early/mid w/c 25th August with a 2 week frame for completion. It is expected that the AIGT will wish to review and discuss the work following the drafting exercise so GH anticipates that the complete legally reviewed draft will be available to send to the industry towards the end of September.

GH commented that he had mapped out a timeline for the completion of IGT039 but due to the AIGT process taking longer than anticipated, the timeframe would require further review. It was expected however that the IGT039 modification should be able to proceed to consultation towards the end of 2014/early 2015.

Action – GH to review and circulate revised timeline for completion of IGT039 work.

10) Future Meeting Dates:

On the basis that the next meeting will be relatively short, consisting mainly of progress updates, it was agreed to hold the next IGT039 meeting at the next Shipper Work Group meeting on 22nd September. It was agreed that as the external legal review will be nearing completion at this date, that the date for the legal review meeting could be discussed at this meeting.

11) AOB:

There was no AOB

Actions:

- 1) JD to undertake further analysis on SSP funding.
- 2) GH to speak to JD about potential options to progress Xoserve development cost recovery.
- 3) GH to review drafting with lawyers for E1.3.
- 4) GH to amend drafting to remove smaller under F11.1
- 5) GH to draft overview of review requirements for ancillary documents to be reviewed and amended outside of IGT039 and list in work group report.
- 6) KS to draft overview paper of SOQ issue in advance of next IGT Shipper Workgroup meeting.
- 7) GH to add recommendation in the work group report that IGT039 proceeds to consultation.
- 8) Action – GH to review and circulate revised timeline for completion of IGT039 work.

Appendix 1 – Issues Log as of 21st August 2014.

Part	Paragraph	Raised by	Comment	Response	Action Complete?	
A	2		This could be where RDL new drafting on overview and interpretation sits in the IGT UNC	Complete under A5	Yes	
	2.10		Look at removing as this will no longer be applicable (check how bulk confirmations are referenced however)	Keep in as there may be some areas which are stil used such as PSR process. Where currently there is the option to deviate to the "Manual" under SSP, all references have been removed	Yes	GH
	4		NExA description needs review i.e. should all refs be updated to IGTAD or should this simply say "or future replacement documents".	IGTAD reference used	Yes	
			Plain English Summary required	Now drafted - to be inserted at beginning of Code but as non-legally binding text	Yes	GH/SL

Part	Paragraph	Raised by	Comment	Response	Action Complete?	
B	3	GH	Needs tidying up as still refers to LMNs	Drafting updated	Yes	GH

Part	Paragraph	Raised by	Comment	Response	Action Complete?
CI	General		C1 3 of the IGT UNC is Called Daily Read Requirement & C1 5 Supply Point Classification. This ties to UNC G1.5 & M6.2 respectively but there are cross overs in content	CI 3 renamed classes of supply point and this part carved out of CI 5	Y
	1.2	SL	1.2 should stay in IGT UNC as sets out one user per supply point rule	ok	Y

2.2	JK	Should "entry SOQ" also be listed as a required field?	This can be calculated by Shippers who have access to load factors. Not all IGTs store this in their systems currently so would suggest that this is subject to a separate change proposal so it can be evaluated in its own right.		
2.8-2.12		2.8-2.12 may need to be removed pending section D and E drafting as the IGT is unlikely to be updating the supply point register with meter info	Agreed to retain at meeting #24. This is an operational process between the IGT and the Shipper and Parts D and E do not overwrite these paragraphs	Y	
3		Daily read equipment needs further review as could be defined in UNC (is referred to in part D)	CI 3.5(b) has been drafted to make it clear that the equipment and responsibilities are those of the GDN	Y	GH/RDL
3.6		Will LDZ CSEP Ancillary Agreement still be correct terminology?	Yes - NEXA definition needs to be amended however	Y	RDL/AM
5.5		to be pointed across but define "days" not business days	Complete	Y	AM/CW
6.1	AP	6.1 needs a way of carving out infill	Draft content now added to text	Y	GH
6.1		this section needs to refer to the x3 types of AQ and link to UNC for rolling AQ where possible	Draft content now added to text	Y	AM
6.2 & 6.3	JK	May be an issue with infill with the current drafting as may be swept up with NEXA table.	Additional text added as follows: <i>"and is not subject to a surcharge under paragraph 5 of Special Condition 1 of the Pipeline Operator's Licence"</i>	Y	GH
6.3		Not clear why this is needed? UNC process should pick this up? Also risk that this may undermine the AQ to which IGT charges are based.	Agreed at meeting #24 to retain as is not captured elsewhere	Y	
6.4		SOQ is not defined using the same term in the UNC so need to identify this and undersand if this acheieves the same thing as SOQ - is this held by Xoserve?	Defintion updated to align with UNC ("Supply Point Capacity")	Y	

		3 types of AQ need to be listed	Added as per email from AM oin 04/06/14	Y	To be taken forwards outside of IGT039
		3 types of SOQ may need to be listed IGTs will still undertake annual review of NEXA table and Xoserve will provide the information to do this. Text needs to reflect this.	Waiting for Xoserve to confirm - 2 types required and both are now added to CI and M	Y	
6.5(b)		IGT AQ review procedures needs to be amended	Draft content now added to text	Y	
6.4		to report procedures		Y	
6.6		6.6 can be removed as follows GDN process	Removed	Y	
8.1.2		8.1.2 can be removed as won't over ride IGT UNC arrangements. However changes needed to iGTAD to link them together	8.1.2 has been removed. Proposal is to update IGTAD to link in termination notices together or at least for NG to check/notify the IGTs.		
9.1		See note - should TPD G2.2.4 be excluded? 10.4 can be removed as class 1 will be DM mandatory so the clause will not be applicable	Yes	Y	c
10.4		post NEXUS	Removed	Y	RDL
12		RDL to consider	Parts of text pointed to the UNC	Y	
13		RDL to revise opening paragraph drafting		Y	
14.6-8		Need to check if is DM or class 1	class 1	Y	
18		Removed from UNC and not replaced - have emailed CW to ask why	Now mirrored in IGT UNC	Y	
19		Not clear what this is trying to achieve. Doesn't appear in UNC so unlikely to be needed.	RDL to review as looks like poor layout/drafting - deleted	Y	
CII		points across but 5.6.3 refers to "total system"	Needs to be covered off under UNC terminology section	Yes	AM

<div style="border: 1px solid black; height: 20px; width: 100%;"></div>					
CIV	2.4.3	need to check with Xoserve that closing read for withdrawal is required under IGT UNC CIV 2.4.2(d)(iii)	No - process to mirror GDN/UNC process	Y	GH/RDL - DONE 039/Xoserve
	3.1	Need to check if reference to E6 in 3.1 is required - depends on what Part E drafting looks like]	Reference removed because E6 points across. Xoserve have confirmed their involvement in the process so have pointed across as will be dealt with in the same way	yes	
	£7.00	Need to check with Xoserve whether they are involved in the re-establishment business process May need to retain this as sets out when IGTs can charge for re-establishment. Could redefine GDN transportation charges in UNC but may be best to retain in IGT UNC?		Y	
			Has been retained for simplicity so as not to try to redefine definitions within the UNC definition	Y	
CV	1-3	Can paras 1-3 point to UNC? Will this impact contractual standing? One off connections under Code require nomination but in practice uses a one line PSR as an IGT to Shipper process. Code implies this should be Shipper driven but haven't anticipated this and Xoserve don't have this mapped out. Need to discuss collectively	Retained in IGT UNC as a mixture of obligations and SSP process. Further complication that some of the definitions if pointed across won't work as the definitions themselves have defined terms within	Y	
	2		Xoserve have confirmed that the process in the BRD will be able to support one off connection process	Y	
D	2.7	point to UNC M4		Y	
	3	Contractual terms for provision of metering so needs to stay in IGT UNC		Y	

	5	How does clamping work in terms of flows and can Xoserve support this?	agreed to align with GDN process	Y	Chris Warner
	6	Not for this mod but tis section needs review Does UK link set out file format for transporter notification to Shipper for transporter installed meter and do Xoserve send this on behalf of the transporter? - M3.2.1(b) (for Xoserve to answer).			
	7.1(b)		clarified under 7.2	Y	AM GH
E	1	Carve out for M5.1.1 and M5.1.3 for transporter definition but not actually referred to in text	Was missed out from previous iteration so new E1.3 added to apply M5.1	Y	GH/RDL
	1.5.2	Daily read Equipment is now referred to as "Transporter" Daily read Equipment - why is this? Is this so that it refers to class one specifically?	Yes	Y	GH/SL
	18	This points to data ownership under K25 so needs to be retained in IGT UNC	Retained and tweaked to extend to 3rd party systems operated on behalf of the IGT		
	14	Points across but includes userpays under 5.13.14© and 5.13.17 for agreed opening reads and EOMRs - Point to user pays but will be recovered by Xoserve under NCUP contract. Likely that charge will be 0.	all ok. Is covered off under para 13 which is correct.	Y	
	14	JK Query on whether "Meter Fit Report" will be the .CD file and whether this could be referenced to avoid confusion Likely this will now use existing user pays mechanism so reference to NCUP can be removed. However, Activity under M5.13.14(d) points to sub para (b) which will be carried out by the GDN. GH to revise text to carve out this instance of Transporter in the IGT UNC drafting that points across..	Confirmed the .CD file will be the file used in line with the SSP BRD	Y	AM
	14		Complete and redefinition added for Transporter term under E1.2	Y	GH

F	11.1-11.3	JK	Review of paras required as may no longer be required	13.1 & 13.2 removed, 13.3 tweaked and kept as a reminder. 13.4 retained.	Y	GH/SL
I			references to NEXA - how will this be defined? i.e. IGTAD or simply amend NEXA definition to include future replacement docs	New IGTAD Definition added to Part M	Y	RDL
K	25		Liabilities to stay in IGT UNC but needs to be tweaked to include UK Link	Looking at clause 26 I the current drafting is ok going forwards as is about general liabilities	Y	CW
	25.1		Needs tweaking to refer to UK link but Xoserve are acting as the IGT agent and so this also needs to be backed off in the iASA.	k25.1 25.1 updated to extend to 3rd party systems operated on behalf of the IGT	Y	
	34		May need reference to UK Link	Para 34 relates to notices and communication "other than one which is given as a System Communication". "Systems Communication" definition has been expanded to include UK Link so is now ok	Y	