

iGT UNC Modification Workstream 15-10

Tuesday 3rd November 2015 at 10.00am

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee	Initials	Organisation
Steve Ladle (Chair)	SL	Gemserv
Dave Addison *	DA	Xoserve
Laura Cahill	LC	SSE Supply
Kirsty Dudley	KD	E.ON
Maria Hesketh *	MH	Scottish Power
Gethyn Howard *	GH	Brookfield Utilities
Adam Iles	Al	British Gas
Anne Jackson	AJ	SSE Supply
Mark Jones	MJ	SSE Supply
Kishan Nundloll	KN	ESP
Paul Orsler	РО	Xoserve
Trevor Peacock *	TP	Fulcrum
Jenny Rawlinson	JR	Brookfield Utilities
Nicky Rozier	NR	Brookfield Utilities
Kirandeep Samra	KS	npower
Paul Rocke	PR	Gemserv

^{*}Attended via teleconference.

1. Welcome and Apologies for Absence

SL welcomed attendees to the meeting of the iGT UNC Modification Workstream. Apologies for absence had been received from Bryan Hale (EDF), Andrew Margan (British Gas) and Katy Binch (ESP).

2. Confirmation of Agenda

The Chair invited any further items for discussion not on the agenda. All requested to raise an additional item with regards to the continuation of the Meter Fit Report. SL agreed that the item would be added to the end of the agenda. It was also agreed to move iGT082 up the agenda to allow GH to join the discussion.

3. Confirmation of Minutes and Actions

The minutes of the iGT UNC Modification Workstream meeting held on 6th October 2015 were reviewed, and a small number of typographical amendments were agreed.



Please refer to the table at the end of the minutes for further actions arising and updates.

4. <u>iGT071 - Updating the iGT AQ Review Procedures Ancillary Document</u>

The Chair reminded the workgroup that the intention of iGT071 was to amend the Ancillary Document for the iGT AQ Review Procedure to align with new processes expected to be introduced under Single Service Provision. JR noted the progress against outstanding action 15/09-02, remarking that she was working to prepare those data items within the NExA Table that were relevant to be considered within the new process under Single Service Provision, to better understand how and when the relevant information to complete the process would be provided. JR noted the intention to have prepared all relevant information in advance of the next workgroup on 1st December 2015.

5. <u>iGT078: Ancillary Document for the New Connections process</u>

KS (as Proposer of iGT078) noted that she had updated the Ancillary Document associated with the Modification; however, she had not circulated the revised document due to late comments received from Naomi Nathanael (Utility Warehouse) which KS was keen to share with the workgroup. The group proceeded to consider the comments raised.

Firstly, it was requested that the 'FREE_TEXT_LINE_1 (256) field' for plot address/developer details might be mandatory within the PSR1, rather than the current optional. JR considered that the iGT would always expect to have plot number information, although TP countered that this may not be available in some instances, including for infill projects. The workgroup agreed that the plot number (where known) would be captured by other fields within the PSR1 file and therefore, were the field above to be mandatory, there would be a duplication of the inputted data.

Secondly, Naomi queried whether there was an agreed format for iGTs to communicate with Shippers in the event that developers' details were to change. The group concurred that the events that triggered an updated PSR1 file to be sent were captured in Section 2.1.1 of the associated Ancillary Document; this would include a change in developer details, and would result in a revised PSR1 to be sent by the iGT to the Shipper up to the point of meter fit (post-meter fit, updates would be managed via the existing supply point maintenance process).

Finally, Naomi had queried whether any additional PSR rejection codes had been agreed other than those within the current version of the associated Ancillary Document. The group concurred that no further rejection codes had been identified as necessary, and that an 'other' code had been included to avoid precluding rejection reasons outside of the agreed examples.

AJ raised a further point for consideration, suggesting that Shippers should have the ability to respond to iGTs if that MAM allocation was incorrect. The group agreed that the PSR2 response file would be the appropriate means of overwriting incorrect MAM information; however, the workgroup did concur that an additional field to positively identify where a change has been made to the named MAM would be beneficial, in order than the iGTs may clearly recognise where the Shipper has named them the appointed MAM for a site.



Furthermore, it was noted that the MAM ID field did not include an 'Option' identifier, 'Field' type, or 'Length' description. The group concurred that MAM ID in the PSR2 should be optional, text and with a length of three characters.

Al sought confirmation that Shippers would receive a revised PSR1 in a number of circumstances:

- 1. Where the PSR contains a plot number and postal address, and the plot number changes;
- 2. Where the PSR contains a plot number but no postal address, and the plot number changes;
- 3. Where the PSR contains a plot number and postal address, and the postal address changes;
- 4. Where the PSR contains no plot number but a postal address, and the plot number changes;
- 5. Where the PSR contains no plot number but a postal address, and the postal address changes.

The group concurred that the iGT would send a revised PSR1 to the Shipper in all instances noted above, as a PSR1 file would be sent each time a plot number or postal address changed. However, the current version of the associated Ancillary Document would require an amendment to ensure that the requirement to send a revised file on change of plot number was captured.

KS noted that a further addition to the PSR template had been made but was not reflected in the current version, which introduced an additional field to identify whether the site was non-domestic or domestic. SL noted that this addition would facilitate the same framework to be utilised for iGT078 and iGT079, which was concerned with a non-domestic new connections process.

The workgroup proceeded to consider the legal text, which had been produced by the Code Administrator at the request of the workgroup. SL noted that two versions of the legal text had been drafted to take account of the possibility that the Modification might be implemented in advance of (particularly if there was any further delay to Project Nexus) or subsequent to the delivery of Single Service Provision arrangements. The workgroup concurred that this dual-approach to legal text drafting should be continued for iGT078 and iGT079. The workgroup agreed that the legal text for iGT078 was appropriate as drafted.

There was some extended discussion around whether the implementation of iGT078 may result in an inability to process new connections for small commercial supply points if iGT079 were to not be implemented, due to the movement from an emphasis on large and small supply points to an approach which instead differentiated between domestic and non-domestic supply points. Those iGTs in attendance agreed that the same processes used for larger commercial supply points could be used for smaller commercial supply points, and that the current bulk confirmations were only used for domestic supply points in any case, with any exceptions solely agreed bilaterally between iGT and Shipper. Therefore, the group concurred that existing processes existed within Code to take account of the scenario.

SL asked the workgroup to consider whether the Modification continued to meet the criteria for self-governance, as originally proposed. The workgroup unanimously agreed that all criteria for self-governance were met.



KS agreed to incorporate all the comments and agreed amendments into a final version of the Modification Proposal, Ancillary Document and PSR templates, and circulate to the workgroup in advance of a final workgroup meeting on 1st December 2015.

Action MWS15/10-01: KS to produce final versions of all documentation for iGT078 and circulate to the workgroup ahead of a final workgroup meeting on 1st December 2015.

6. iGT079: Adding Non-Domestic New Connections Framework Ancillary Document

The Chair noted that Andrew Margan (Proposer of iGT079) had circulated an amended version of the Modification Proposal for iGT079 to the workgroup as a late paper, and asked AI to present the revisions on his behalf. Several workgroup members noted their concerns at the lateness of the paper, which had allowed attendees insufficient time to fully consider any impacts of the amendments.

SL noted that the changes to the Modification Proposal resulted in an increase of the Modification's scope to include *all* commercial new connection processes, which Al considered was intended in order to increase certainty by introducing a single commercial process. JR noted that the Modification did not appear to exclude the Siteworks process, rather it obligated the use of the PSR process. KD considered the importance of understanding the overall effect of how the Modification changed existing processes, including where and how events, including the sending of the PSR, were triggered. Al noted the anticipated principle was that the PSR process would occur in advance of the existing nominations and confirmations process; British Gas was developing a process diagram to clarify how the intended changes would work in practice.

The group considered whether introducing a PSR process in addition to a robust and proven nominations and confirmations process may be superfluous. KD suggested that a PSR process may not deliver additional benefit further than mirroring the process for the domestic framework, and therefore delivering a degree of consistency.

The workgroup considered to defer any further development of the Modification in the absence of the Proposer; however, the workgroup attendees agreed to consider the impacts of the changes to the Modification Proposal that had been put forward in advance of the meeting.

Action MWS15/10-02: iGTs and Shippers to consider the impacts of the amendments to the Modification Proposal for iGT079, particularly the Business Rules which appear to widen the scope of the Modification to incorporate all commercial new connection processes.

7. iGT080: Mandating iGT use of Xoserve Portfolio Data for Shipper Transportation Billing

MJ (Proposer of iGT080) noted that he had circulated a revised version of the Modification Proposal in advance of the meeting, incorporating substantial amendments to most sections of the change, including the title, rationale for change, solution, and legal text. MJ noted that he will still awaiting



information regarding mismatches between the iGT portfolios and the Supply Point Register, which would add further evidence to the rationale for change.

There was extended discussion with regard to the appropriateness of the title of the Modification Proposal, primarily due to the ownership of the Supply Point Register. Consequently, the workgroup provisionally agreed that the title should be amended to "Mandating iGT use of data as administered by the Pipeline Operators' Agency for Shipper Transportation Billing".

JR considered that the rationale for change required a further review, as much of the existing content might be considered irrelevant, inaccurate or inflammatory. Notably, JR considered that iGTs are incentivised to correct data held on the Supply Point Register, through both NExA obligations and a deference to safety. Furthermore, JR considered that a significant part of the rationale was concerning a solution to an issue that may already be solved by Single Service Provision, and therefore JR noted that it could be considered unjustified to argue that a solution was required at this point. MJ agreed to revisit the rationale for change with JR outside of the meeting.

KD queried the end-of-day cut-off requirement for entry of information, recognising that there could be a slight delay in submission of data. MJ indicated that the intention of the Modification was not to penalise iGTs for late entry of information, and that further guidance would be added that, "for the avoidance of doubt, any adjustments due to timing will be rectified in the following invoicing run".

JR drew the workgroup's attention to the third business rule within the solution of the Modification:

3. iGTs can only charge Shippers for Supply Meter Points from the date they become effective on the Xoserve database.

JR considered that on occasion the iGT will not be made aware of a meter installed by a third party until later in the process, and suggested that the rule above would not allow the iGT to backdate charging. PO was uncertain whether Xoserve could record an effective date for the meter point creation record, and would seek to confirm ahead of the next meeting. JR considered whether the third business rule was superfluous in any case, and believed that the intention of the Modification was delivered by the first two rules.

AJ was unsure why SSE should be providing a benefits case for iGT080 that went further than highlighting that the implementation of a single database for invoicing was a part of the benefits case for Project Nexus, and therefore not implementing the change would lead to an erosion of that benefits case.

In consideration of how the proposal facilitated the Relevant Objectives, JR considered that Objective (d) 'securing effective competition' was not better facilitated as there was no proof that Shippers would be picking up inaccurate charges under Single Service Provision. AJ countered that by mandating



invoicing off a single database, the risk of invoicing information being inconsistent would be minimised. JR queried how Shippers intended to reconcile the information between the central databases and the individual iGT portfolio; AJ noted that, whilst SSE intended to reconcile the information, the methodology behind this was commercially confidential. Whilst recognising this sensitivity, the workgroup agreed that parties should provide high level feedback on the cost-benefit case associated with implementation (and non-implementation) of iGT080.

Regarding implementation timescales, SL noted that the Modification Proposal states a requirement for an implementation date four months following implementation of Project Nexus changes. The workgroup concurred that the four month delay was based on a more complex solution, and based on the current requirements, implementation could be aligned with Project Nexus. However, KD noted that the change should be reticent of the fact that the solution can only apply for charging from 1st October 2016.

MJ agreed to amend the Modification Proposal following the discussions within the workgroup, and recirculate to parties in advance of the next Modification Workstream on 1st December 2015.

Action MWS15/10-03: MJ and JR to discuss proposed amendments to the rationale for change for iGT080, with changes to be incorporated into a revised Modification Proposal.

Action MWS15/10-04: MJ to revise the Modification Proposal for iGT080 based on discussions within the workgroup, and recirculate to parties in advance of the Modification Workstream on 1st December 2015.

Action MWS15/10-05: All Parties to provide high level feedback to the Code Administrator on the cost-benefit case associated with implementation (and non-implementation) of iGT080.

8. iGT082: iGT Single Service Provision, non-effective Days for cutover in 2016

SL and GH presented the new Modification Proposal iGT082, which had been sent to the Modification Workstream for further development following the Modification Panel meeting on 21st October 2015. The Modification sought to create seven non-effective days in advance of the Project Nexus Implementation Date, to enable data preparation and cut-over to the arrangements created by iGT039. The Proposal sought to replace iGT072, which had been accepted based on Project Nexus Implementation Date being 1st October 2015. Following the year-long delay to implementation of Project Nexus, iGT072 was deemed irrelevant, and Ofgem therefore agreed to indefinitely postpone its implementation pending the agreement of revised industry arrangements.

The workgroup unanimously agreed that the proposed Terms of Reference were appropriate.

PO considered that it may be prudent to align the progression of iGT082 with its equivalent UNC Modification UNC0532. AJ considered that iGT082 should be considered for implementation no later than UNC0532, as she considered that if a seven day non-effective period was deemed appropriate



within the iGT UNC, there should be no issue within the UNC; however, the same might not be true of the reverse. The Code Administrator agreed to speak with the Joint Office to ensure that the development of the Modifications in the iGT UNC and UNC could proceed with the greatest possible alignment.

GH (as Proposer of the Modification) clarified that the amendments from iGT072 were minimal, and solely sought to increase the number of non-effective calendar days from six to seven. The workgroup agreed the need to make absolutely clear that implementation of iGT082 would overwrite all changes agreed within iGT072.

SL noted that there was a preference from parties for a consistent number of non-effective days within both iGT UNC and UNC to ensure cross-code consistency and uniformity of messaging to consumers. AJ considered the importance of a clear explanation to Ofgem that there would be no difference between iGT072 and iGT082 with respect to the number of impacted business days. PO agreed to provide a detailed summary of the justification for the requirement for the additional non-effective day, for inclusion in the Workgroup Report for iGT082.

GH noted that the Workgroup Report for iGT072 contained an accompanying report covering much of the additional detail and impacts of the change. GH agreed that he would revisit that accompanying report and amend for iGT082, assessing where the additional non-effective day would incur further impacts.

Action MWS15/10-06: Code Administrator to speak with the Joint Office to coordinate the development and progression of iGT082 and UNC0532.

Action MWS15/10-07: GH to consider the analysis that accompanied the Workgroup Report for iGT072 and prepare a revised version for iGT082 taking into account the changes and impacts of the additional non-effective day.

9. Enduring Transformation Rules – UK Link Programme

In respect of the preparation of iGT data for Single Service Provision, PO noted that a number of transformation rules had been captured which supported data availability for market trials related to iGT meter points. PO noted that some of the current data did not fit the SAP system for the purposes of market trials, which the transformation rules looked to overcome.

Xoserve had previously recommended for Transformation Rules to be discussed and agreed at an iGT UNC Workgroup, however Shipper representatives at UK Link Industry Engagement Forum (UKLIEF) have requested that the rules are taken to UK Link Committee for Shipper approval. Detailed rules, and the volumes associated with the rules, will first be considered by iGTs at the SSP review meeting before being discussed and agreed at the Data Cleansing Workgroup. Once a rule has been widely accepted, the proposal will be to take this to UK Link Committee for formal approval with the Shipper



community. The UK Link Committee has agreed plans to agree the enduring rules. Detailed rules, and the volumes associated with the rules, will be considered by the Data Cleansing Workgroup to be agreed by Shippers, and a separate forum to be agreed by the iGTs. Once a rule is widely accepted, it would be taken to the UK Link Committee to sign off the enduring transformation rule.

10. Address Data Quality Working Group

The Forum considered a presentation sent through by Katy Binch (ESP) with respect to the outputs of the Address Data Quality Working Group. It was widely considered that the workgroup had been unable to provide substantial recommendations, as insufficient time had been provided by Ofgem to ensure that thorough impact assessments could be completed.

11. Continuation of Meter Fit Report

Al presented a proposal for a Modification that British Gas was considering to table with respect to the continued provision of the Meter Fit Report as an interim measure following the implementation of Single Service Provision. SL considered that the change to the iGT UNC as a result of iGT039 does not remove the concept of the Meter Fit Report, but does amend the data items contained therein. Al considered that it had become evident that the report would no longer contain plot information.

Al noted that British Gas intended to raise the new Modification Proposal at the November Modification Panel meeting, and invited initial comments.

12. Date of Next Meeting

The next meeting of the Modification Workstream will be held on 1st December 2015.

iGT UNC Modification Workstream Action Table

Action Ref	Meeting Date	Action	Owner	Status Update
MWS15/03-05	7 th April 2015	KD to investigate the proportion of aborted visits for iGT sites only, to assist with the cost-benefit analysis for iGT075.	KD	Carried forward
MWS15/08-02	1 st September 2015	(iGT071) Xoserve (PO) to confirm with iGTs the information they can provide to iGTs regarding the AQ Review Procedures Process and iGT's to review and respond confirming the timescales and data they can provide.	Xoserve	Closed. Superseded by 15/09-02.
MWS15/08-07	1 st September 2015	Xoserve (PO/SN) to refine options for Provision of Plot Summaries and parties to submit any further proposals over the next two months, in time for the 3 rd November Modification Workstream meeting.	Xoserve	Carried forward. PO advised that data is unlikely to be available until 2016.



MWS15/08-08	1 st September 2015	Gethyn Howard (Brookfield Utilities) and Xoserve to liaise in regards to New Effective days, with the view to raising a replacement Modification to iGTUNC072.	Gethyn Howard/ Xoserve	Closed. IGT082 raised.
MWS15/09-01	6 th October 2015	Gemserv to amend Workgroup 15-08 minutes and circulate the draft to attendees for approval prior to publishing them on the iGT UNC website.	Gemserv	Closed. Complete.
MWS15/09-02	6 th October 2015	Xoserve (PO) and Brookfield Utilities (JR) to continue developing iGT071 outside of the Workgroup, to ascertain what data Xoserve can provide to iGTs, so they can determine how they can complete the revised data table.	Xoserve/ Brookfield Utilities/ iGTs	Carried forward.
MWS15/09-03	6 th October 2015	npower (KS) to amend Modification iGT078 with agreed changes and to circulate the final version to the Workgroup for information only.	npower	Closed. Complete.
MWS15/09-04	6th October 2015	Xoserve (PO) to provide Gemserv with the link to the MDD (Market Domain Data) displayed on the Xoserve website, and Gemserv to circulate this information to iGT UNC parties.	Xoserve/ Gemserv	Closed. Complete.
MWS15/09-05	6th October 2015	SSE Supply (MJ) to receive feedback from parties regarding iGT080 and present re-drafted Modification/Business Rules in advance of the Modification Workstream in November.	SSE Supply	Closed. Complete.
MWS15/09-06	6 th October 2015	British Gas (AM) to update iGT079, and following internal sign off, submit to the iGT UNC Code Administrator for circulation.	British Gas	Closed. Complete.
MWS15/09-07	6 th October 2015	Gemserv to write to iGTs to get a better idea of the likely need for any further MPRN range allocations over the next year.	iGTs/ Gemserv	Closed. Complete.
MWS15/09-08	6 th October 2015	Xoserve (PO) to supply any papers for the Operational Update to the iGT UNC Secretariat (Gemserv) for circulation prior to the relevant Modification Workstream.	Xoserve/ Gemserv	Closed. Complete.
MWS15/10-01	3 rd November 2015	KS to produce final versions of all documentation for iGT078 and circulate to the workgroup ahead of a final workgroup meeting on 1st December 2015.	KS	



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MWS15/10-02	3 rd November 2015	iGTs and Shippers to consider the impacts of the amendments to the Modification Proposal for iGT079, particularly the Business Rules which appear to widen the scope of the Modification to incorporate all commercial new connection processes.	iGTs / Shippers	
MWS15/10-03	3 rd November 2015	MJ and JR to discuss proposed amendments to the rationale for change for iGT080, with changes to be incorporated into a revised Modification Proposal.	MJ/JR	
MWS15/10-04	3 rd November 2015	MJ to revise the Modification Proposal for iGT080 based on discussions within the workgroup, and recirculate to parties in advance of the Modification Workstream on 1st December 2015.	MJ	
MWS15/10-05	3 rd November 2015	All Parties to provide high level feedback to the Code Administrator on the cost-benefit case associated with implementation (and non-implementation) of iGT080.	All	
MWS15/10-06	3 rd November 2015	Code Administrator to speak with the Joint Office to coordinate the development and progression of iGT082 and UNC0532.	Gemserv	
MWS15/10-07	3 rd November 2015	GH to consider the analysis that accompanied the Workgroup Report for iGT072 and prepare a revised version for iGT082 taking into account the changes and impacts of the additional non-effective day.	GH	