

iGT UNC Modification Panel Meeting 17-12

Wednesday 20th December 2017

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee	Organisation	Representing	As
Steve Ladle (SL)	Gemserv	Code Administrator	Chairman
Andrew Margan (AM)*	British Gas	Pipeline Users	
Mark Jones (MJ)*	SSE Energy Supply	Pipeline Users	
Kirsty Dudley (KD)*	E.ON	Pipeline Users	
Cher Harris (CH)*	Indigo Pipelines	Pipeline Operator	
Victoria Parker (VP)*	ESPUG	Pipeline Operator	
Jenny Rawlinson (JR)*	BU-UK	Pipeline Operator	
Roberta Fernie (RF)*	Ofgem	Authority	
Rachel Bird (RB)	Gemserv	Code Administrator	Secretariat

**Attended via teleconference*

1. Alternates, observers and apologies

The Chair welcomed attendees to the meeting of the iGT UNC Modification Panel meeting.

2. Confirmation of Agenda

The Chair asked the Panel if they had any additional items to add to the agenda for this meeting. The Panel was happy with the agenda and did not have any additional items to add.

3. Approval of the previous minutes

RB informed the Panel that no comments had been received regarding the November Panel meeting minutes before the meeting. RF noted that a reference to Ofgem closing down over the Christmas break is incorrect and should be changed to reflect the publishing moratorium that is taking place, RB noted that change. The minutes from the previous Modification Panel meeting (15th November 2017) were approved as a true and accurate record of the meeting.

4. Outstanding actions

17/11-01	Code Administrator to add 2018 Panel meeting dates to the Joint Office event diary and the iGT UNC website.	Completed. Closed.
17/11-02	Code Administrator to follow up with the Joint Office to discuss the meeting clash with the	Completed. Closed.

	iGT UNC Panel and PAC meetings.	
17/11-03	Code Administrator to add 2018 Workstream meeting dates to the Joint Office event diary and the iGT UNC website.	Completed. Closed.
17/11-04	Code Administrator to add iGT104 to the December Workstream meeting for discussion.	Completed. Closed.
17/11-05	Code Administrator to send out correspondence for parties to review Part K of the iGT UNC code in preparation for discussions on iGT104 at the December Workstream.	Completed. Closed.
17/11-06	Code Administrator to add question to the Draft Modification Report to request respondents to indicate if system changes would be required, and the minimum timescales for that system change in the solution of iGT102.	Completed. Closed.
17/11-07	Code Administrator to send the Draft Modification Report for iGT102 out for Consultation with the closing date of 6 th December 2017.	Completed. Closed.

RB concluded that all action points from the last meeting are now closed.

5. Short Notice Business

None

6. Panel decisions

Regulatory Sandbox

RB presented the paper to the Panel noting that in response to Ofgem's new Innovations work the BSC have raised a change Proposal which would introduce the concept of the Regulatory Sandbox into Code; this will allow innovators to trial innovative business propositions that will benefit consumers without incurring all of the usual regulatory requirements. Business propositions that are deemed eligible for sandbox support will receive bespoke guidance to help address regulatory barriers; innovators will be able to rely on the guidance for a defined period of time. Ofgem has proposed that where an innovative business model, product or service identifies a regulatory barrier,

they will reduce the regulations for a limited period of time (e.g. 18 months) in order to allow a trial. Ofgem proposes that they would do this through legally binding advice on the interpretations of the legal requirements. RB note that when speaking to Pamela Taylor of Ofgem she indicated that with regards to the Regulatory Sandbox the immediate concern is lifting the barriers currently in place in Code which would stop innovators from introducing a ground-breaking or significantly different proposition to what is currently in the market. Pamela Taylor did note that at the moment Ofgem is not considering the Regulatory Sandbox will deal with long-term policy changes, although recognised that this would develop hand-in-hand in the future. It is apparent that for this initiative to work an amount of unilateral cross-code working will need to take place to align the intention of the derogation process across the industry. At the November CACoP meeting, CAs were tasked to speak with their Panels with regards to the Sandbox. As a side, Ofgem has invited all Code Chairs and key stakeholders to attend a meeting in January to discuss this issue.

RB noted that there are currently no iGT UNC provisions to allow for the iGT UNC Panel to grant any derogation to parties with regards to relaxing regulations around implementation of a modification to the Code, or derogations against being in breach.

RF suggested that it may be beneficial to inform the Panel of the Innovation teams progress so far with the sandbox and offered to speak with colleagues in order for someone to attend a future panel to present. The Panel welcomed this and noted that the iGT UNC may want to work with the UNC on a unified approach. RB added that the UNC has not yet addressed the issue and were not in attendance at the CACoP meeting in question.

The Panel agreed to defer this issue until a member of Ofgem can attend the Panel meeting to discuss this concept.

Action 17/12-01: RF to discuss the possibility of a colleague from Innovations to attend the Panel to discuss the Regulatory Sandbox and their progress so far.

7. Update on Modification Workgroups

None.

8. Withdrawn Modifications

None.

9. Urgent Modification Proposal received

None.

10. Non-urgent Modification Proposals received

[iGT105 - Creating permissions for the CDSP to release data to Meter Asset Providers](#)

KD introduced the new modification proposal to the Panel. The modification proposal is a mirror of UNC442 (which was further developed by UNC637S) and seeks to ensure iGT data can be released

to Meter Asset Provider (MAP) organisations via the Central Data Services Provider (CDSP) where they provide the Meter Point Reference Number (MPRN) Meter Serial Number (MSN) and meter model to the CDSP. The CDSP conducts a validation check and where the details have a positive match the CDSP releases specific items related to Supply Point information to the enquiring MAP.

JR queried whether this would act as a blanket permission for iGT data to be released to MAPs and under what circumstances the data could be requested. KD noted that MAPs would need to meet certain criteria and that MAPs would only be provided with a select amount of data by the CDSP. KD continued that the UNC modifications were introduced before the concept of the SSP (Single service) covering the iGTs were fully scoped, and therefore had left them out.

The Chair noted that this modification points across to the established UNC permissions.

MJ queried whether the reference to 'GT ID' should, in fact, be 'iGT ID'. KD suggested that this was a defined term used by Xoserve for both iGT and GT meter point IDs, however, was happy to add additional clarification to the proposal.

The Panel noted that the proposal had been informally discussed at the December workstream with no major concerns raised by workstream attendees. The Panel was asked to vote on iGT105 and unanimously supported this Modification being sent out to Consultation.

Action 17/12-02: Code Administrator to send the Draft Modification Report for iGT105 out for Consultation with the closing date of 17th January 2018.

[iGT106 - Provision of access to Domestic Consumer data for Suppliers](#)

AM introduced the new modification proposal to the Panel. This is an enabling modification, which seeks to create the necessary permissions in iGT UNC to permit the release of domestic consumer data to Suppliers similar to the current arrangements that are in place for PCWs (iGT UNC modification 095). The release of data is subject to validations undertaken by the Transporter and would be pursuant to data protection principles.

CH queried whether Suppliers would be required to sign all agreements similar to Price Comparison Websites in order to access the data through the DES API solution. JR added whether there would be similar validation and restricted access measures such as the current checks in ECOES system. AM noted that this would be the case with only a subset of the current data provisions being made available to Suppliers. VP added that the restrictions and rules would be set out in the agreements Suppliers will be required to sign, however, questioned whether the current agreements include telephone services. AM noted that the intention for the modification would be to send to at least one Workgroup for development and discussion.

The Panel agreed to send this to at least one Workgroup and noted this should be added to the January agenda.

Action 17/12-03: Code Administrator to add iGT106 to the January Workstream meeting for discussion.

11. Fast-Track Modification Proposals received

None.

12. Workgroup Reports

[iGT104 - Permissions modification to allow the CDSP to release iGT supply point information under UNC MOD0520A](#)

The Chair introduced this Modification to the Panel and noted that the Workgroup completed its report for this Modification at the 5th December Workstream meeting. Noting that this modification seeks to create permissions to allow the CDSP to release iGT supply point information under UNC0520A. The Chair added that the workgroup agreed with the proposer's view that this modification should not be Self-Governance. The Chair noted that the Workgroup realised that there was some ambiguity in Code and on that basis agreed that the modification would give more clarity to the Code and would be beneficial in facilitating Relevant Objective F. The Chair added that during Workgroup discussions further clarity was suggested to include that the Performance Assurance Framework Administrator (PAFA) maintains confidentiality of iGT data as per the UNC text.

The Chair opened up discussions to the Panel on whether there were any comments regarding the Workgroup report for iGT104, however, had no further comments to make.

The Panel was asked to vote on iGT104, the Panel unanimously supported this Modification being sent out to Consultation.

Action 17/12-04: Code Administrator to send the Draft Modification Report for iGT104 out for Consultation with the closing date of 17th January 2018.

13. Final Modification Reports update

[iGT102 - Enduring solution for provisions that allow consecutive estimated invoicing in the event of System Failure by the CDSP](#)

The Chair Summarised the Consultation responses noting that five responses were received and of the five, three Pipeline Operators offered support to the Modification, one Pipeline User offering qualified support and one Pipeline User opposed the modification. Panel members discussed whether the modification should be Self-Governance. RF noted that Ofgem is of the opinion that this modification may not present a material impact and therefore, it is at the discretion of the Panel to determine its status. JR stated that the modification's intent is to prevent serious cash flow implications which could have a material impact to industry. This view was generally supported by other Panel members who whilst agreeing that there should be no consumer impact as consumer billing was not directly connected to iGT billing, also understood that a prolonged period of significant

problems with the daily delta from the CDSP could have a material impact on iGT revenues. All Panel members bar one supported the view that the Modification merited an Authority decision.

The Chair highlighted that during the Consultation of this modification suggested changes were made to the legal text by a Pipeline User. JR noted the comments but stated that their view was that the legal text fully delivers the intent of the modification. Pipeline User comments on clauses 9.1.1 & 9.1.1 (c) relate to pre-iGT97 and iGT102 text, and no changes have been made. JR noted that they believe changing this would be out of the scope of iGT102 and any further changes to these clauses would need to be considered in a separate modification. The Proposer acknowledged that comments made by the KD on 9.2.4 (including 9.2.4 vii and 9.2.4i) are valid, however, noted that any change to the modification would require a change to the delivery of the solution and a possible re-consultation. JR suggested that the issue of all iGTs following the same process during invoicing can easily be solved by taking a pragmatic approach rather than mandating iGTs to a strict process in the legal text which may need to be adapted case-by-case.

Finally, JR stated that with regards to comments received on 21.2(c)(i) this modification is only intended to be invoked when a catastrophic event occurs outside of the iGTs control, therefore, if a system failure happens 'in-house' these rules would not apply. KD thanked the Proposer for considering their comments.

The majority of Panel members agreed that this Modification meets the criteria set out in Objective's A and F for the reasons as set out in the Modification and in the consultation responses, however, KD noted a negative effect on Relevant Objective F.

The vote was carried out with three Pipeline Users and three Pipeline Operators. The Panel recommended that the Modification should be implemented by a majority vote of 4-to-2.

The Panel discussed which category this modification falls under according to the Code rules and their associated lead implementation times. The Panel decided that this modification would come under a system change modification with a six-month implementation window after the date of direction or consent by the Authority.

Action 17/12-05: Code Administrator to send the Final Modification report for iGT102 to the Authority for decision on its implementation.

14. Authority Update

None.

15. AOB

Faster switching review group

The Chair noted that the UNC has raised a review group to discuss Faster Switching (UNC630R) and suggested that the iGT UNC should raise a similar group to discuss Faster Switching issues. The Chair added that the iGT UNC would need to be changed in accordance with any UNC changes to

maintain single service. MJ noted that the UNC will next be meeting to discuss UNC630R on 26th January 2018 and this should give some steer to industry as Ofgem's recommendations will have been published.

The Chair noted that a modification will need to be raised to create the review group and noted the Panel's suggestion to delay this until after the January meeting.

The next Modification Panel meeting will be convened on 17th January 2018.

Summary of Actions

Action Reference	Date	Action	Owner	Status
17/12-01	20 th December 2017	RF to discuss the possibility of a colleague from Innovations to attend the Panel to discuss the Regulatory Sandbox and their progress so far.	CA	New
17/12-02	20 th December 2017	Code Administrator to send the Draft Modification Report for iGT105 out for Consultation with the closing date of 17 th January 2018.	CA	New
17/12-03	20 th December 2017	Code Administrator to add iGT106 to the January Workstream meeting for discussion.	CA	New
17/12-04	20 th December 2017	Code Administrator to send the Draft Modification Report for iGT104 out for Consultation with the closing date of 17 th January 2018.	CA	New
17/12-05	20 th December 2017	Code Administrator to send the Final Modification report for iGT102 to the Authority for decision on its implementation.	CA	New