

## **iGT UNC Modification Workstream Meeting 18-03**

**Tuesday 6<sup>th</sup> March 2018**

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

| <b>Attendee</b> |      | <b>Organisation</b> |             |
|-----------------|------|---------------------|-------------|
| Steve Ladle     | (SL) | Gemserv             | Chairman    |
| Kate Mulvany*   | (KM) | Centrica            |             |
| Mark Jones      | (MJ) | SSE                 |             |
| Kirsty Dudley   | (KD) | E.ON                |             |
| Rob Johnson     | (RJ) | ES Pipelines        |             |
| Nicky Rozier*   | (NR) | BU-UK               |             |
| Paul Orsler     | (PO) | Xoserve             |             |
| Rachel Bird     | (RB) | Gemserv             | Secretariat |

### **1. Welcome and apologies for absence**

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

### **2. Confirmation of Agenda**

The Chair confirmed the items for discussion as outlined in the final agenda. NR requested that the iGT name be discussed as AOB. The Chair noted that this would be covered at the end of the meeting.

### **3. Approval of the Previous Minutes**

Attendees reviewed the minutes from the Modification Workstream meeting held on 6<sup>th</sup> February 2018 (18-02). The Workgroup did not have any comments on the previous minutes. The minutes were agreed and approved as a true and accurate record of the meeting.

### **4. Outstanding Actions**

Please refer to the table in Appendix 1 at the end of the minutes for updates on actions arising.

### **5. Cross-Code Modification Implications**

The Chair introduced a document prepared by the Code Administrator which is to be used to track UNC modifications which could have an impact on the iGT UNC.

The Workgroup reviewed the document and discussed the possible implications to the iGT UNC, the discussion is detailed below;

| Mod Ref | Description   | Workgroup determination  |
|---------|---|--|
| 651     | Replacement of the Retrospective Data Update provisions   | The Workgroup resolved to monitor this modification as legal text has not yet been released and this may have an effect on the iGT UNC.  |
| 650     | Minor Typographical Correction to UNC0638V Legal Text   | No implications on the iGT UNC.  |
| 649     | Update to UNC to formalise the Data Enquiry Service Permissions Matrix  | No implications on the iGT UNC in current legal text, however, the iGT UNC does not directly reference 'Data Enquiry Service' and it has been agreed to cover this off in the RG003 review group work.   |
| 648 S   | End dating the revised DM Read estimation process introduced by Modification 0634                                   | iGT107F has been raised and is currently out for Consultation with a closing date of 20th March 2018. This will then go to the March Panel for decision.   |
| 647     | Opening Class 1 reads to Competition  | This modification proposes to Open Class 1 reads to competition by introducing common arrangements for Class 1 and 2 by removing the DNO obligation to provide a Daily Read service to Shippers for non-telemetered Class 1 Supply Meter Points. There may be iGT UNC implications and Workgroup resolved to monitor this modification.  |
| 644     | Improvements to nomination and reconciliation through the introduction of new EUC bands and improvements in the CWV | No iGT UNC implications. However, could impact iGT systems as this proposes to make changes to the charging bands.   |
| 641 S   | Amendments to Modification 0431 - Shipper/Transporter - Meter Point Portfolio Reconciliation rules and obligations  | iGT103 has been raised and the workgroup report was completed at the March Workstream. This will then go to the March Panel for decision on its consultation.  |
| 640 S   | Provision of access to Domestic Consumer data for Suppliers   | iGT106 has been passed for implementation by the iGT UNC Panel however, this decision has been made before the UNC equivalent mod which will go before the UNC Panel on 15th March 2018. The iGT UNC Panel approved this modification with the recommendation that it is aligned with the implementation of UNC640S.   |
| 637 S   | Amending the permissions to release data to Meter Asset Provider organisations                                      | iGT105 has been passed for implementation by the iGT UNC Panel and will be incorporated into a special release on 22nd March 2018. <b>The Workgroup has resolved to remove this from the live list.</b>  |
| 635     | Reforms to incentivise accurate and timely DM reads to improve the accuracy of Unidentified Gas allocation          | This modification was withdrawn by the proposer on 20th February 2018. <b>The Workgroup has resolved to remove this from the live list.</b>  |
| 634     | (Urgent) - Revised estimation process for DM sites with D-7 zero consumption  | iGT107F has been raised and is currently out for Consultation with a closing date of 20th March 2018. This will then go to the March Panel for decision.   |
| 632 S   | Shipper asset details reconciliation  | The Workgroup noted that this may affect the iGT UNC and noted that this should continue to be monitored. WG noted the intention of this modification has changed slightly and therefore the Workgroup report has not yet been finalised. Although the iGT UNC points across to part of Section M it does not encompass all changes made to the UNC. Possible iGT UNC implications.<br><br><b>ACTION; CA to review the legal text of UNC632 to</b> |

|       |   | ascertain whether there is a catch-all statement which would include iGT details.  |
|-------|---|--|
| 630 R | Review of the consequential changes required in UNC as a result of the Ofgem Switching Programme                    | The Workgroup noted that this may affect the iGT UNC and noted that this should continue to be monitored. WG resolved to wait for more development in this review group before forming an iGT equivalent.  |
| 624 R | Review of arrangements for Retrospective Adjustment of Meter Information, Meter Point/Supply Point and Address data | This Review group has been closed and a modification (UNC651) raised as a result. <b>The Workgroup resolved to remove this from the tracker.</b>   |
| 623   | Governance Arrangements for Alternatives to Self-Governance Modification Proposals                                  | The Consultation is with the Authority for decision and the UNC Panel recommended its implementation. A mirror modification will be needed for the iGT UNC if parties require the iGT UNC process for self-governance alternate modifications.   |
| 619   | Application of proportionate ratchet charges to daily read sites  | 619, 619A & 619B are currently with the Authority for decision. iGT UNC to monitor which modification Ofgem approve as these are Authority decision modifications.   |
| 434   | Project Nexus – Retrospective Adjustment  | This mod was approved at the same time as the other Nexus Mods but implementation of certain parts was deferred until at least November 2018. It is recommended that the iGT UNC text be reviewed to determine whether any further changes are required to properly align with the UNC legal text for this modification.<br><b>The discussion is outlined below.</b> |

**Action MWS18/03-01: CA to update the Cross-Code modification implications tracker to close all modifications which do not implicate the iGT UNC.**

**Action MWS18/03-02: CA to review the legal text of UNC632 to ascertain whether there is a catch-all statement which would include iGT details.**

The Chair introduced a paper prepared for the meeting which summarised the review conducted of UNC434 and the current provisions in the iGT UNC. The Chair noted that generally most areas of UNC434 have been picked up in Code. There is one area where a correction to the iGT UNC may need to be made and that is with regard to the introduction of a reference to Updated Meter Readings (as per M5.16 of the UNC) which would appear to have been omitted when the FGO changes were being made.

PO noted that this is a live process and the CDSP would process such a request for updated meter reading for an iGT Supply point. KD noted that the gap should be bridged with a Fast track modification, which E.ON are happy to sponsor.

The Chair suggested some legal text which would bridge the gap in the text;

#### **Part E (new paragraph)**

#### **21 Updated Meter Readings**

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

#### **Part M (definitions)**

“Updated Meter Reading” shall have the meaning ascribed thereto in the UNC;

**Action MWS18/03-03: KD to raise a FT modification to bridge the current gap in Code as a result of the UNC434 review.**

#### **6. Modification Workgroup**

[iGT103 - Inclusion of reference within iGT UNC to UNC TPD Section G paragraph 2.12 – 2.14 inclusive - Meter Point Portfolio Reconciliation](#)

PO introduced the modification to the Workgroup noting that this modification seeks to ensure parity between both the iGT UNC and UNC, for the treatment of iGT Supply Meter Points, to improve the completeness of the data held within the Supply Point Register on behalf of industry parties by carrying out a MPRN portfolio reconciliation between Shipper records and CDSP systems. The Workgroup agreed that this modification qualified for Self-Governance status.

PO noted that a late change to the solution of UNC0641S has amended the proposed number of business days advance warning of the exercise. This has been changed from 90 days to 60 days and this has been reflected in the varied iGT Modification proposal and Workgroup report.

The Workgroup discussed possible system impacts which may be resultant of this modification. RJ and NR noted that generally there would be little impact for iGTs. For Shippers the parties present confirmed that they would have to make minor system changes but could not confirm that this would be the case for all Shippers, dependant on their portfolio size and whether or not they previously automated this process being of an ad-hoc nature. The Chair noted that the latest date to implement any required system changes would be prior to having to deliver the report in late November 2018 rather than the date at which the modification is formally implemented into the Code.

The Workgroup discussed the positive impact suggested by the proposers on Relevant Objective D. PO identified that the positive impact on competition would be to bring any identified unregistered supply points into the market. The Workgroup also agreed with the proposer that this improved the quality of data and Objective F in cross-code alignment.

The Workgroup discussed suggested implementation dates for this modification and discussed the notice period needed for industry to take a snapshot of their portfolio, which PO indicated has to be as close to the exercise as possible. KD noted that there would be some system changes, however, noted that these would likely not be significant changes. The Chair highlighted that as per the Code, system changes are normally required to give six months' notice for industry after Panel approval to implement, and the Workgroup recognised that the current timeline would not fit in with this.

The Workgroup resolved that the latest implementation date for this Modification is May 2018 and considered that there may be a need for an extraordinary release which would allow parties five months' notice period.

The Workgroup suggested that the Panel should accept a shortened Consultation period so this modification can be brought back to the April Panel for decision, with the 10-day appeal window expiring in early May 2018. KD added that the Panel may wish to consider adding a specific question to the Consultation which requests information on the extent of any likely system changes, and the notice period required to make these changes.

The Workgroup reviewed the proposed legal text and agreed that this supports the intended solution. KD queried whether the additional title of 'Supply Portfolio' was appropriate for the new process and PO resolved that this was a defined term in the UNC, therefore, to align this it was brought over to the iGT suggested text.

**Action MWS18/03-04: CA to finalise the Workgroup report for iGT103 and add this to the Final Agenda for the March Panel meeting.**

## **7. Review Group**

### [RG003 - Review of Data Permissions](#)

PO introduced this review group noting that the aim of this group seeks to undertake a review of data permission provisions within the iGT UNC and produce a summary of the Workgroups findings to the iGT UNC Panel for consideration. NR clarified that this group was around carrying out an exercise to compare the provision for data permissions in both Codes and not data access for third parties. NR noted that Brookfield would support the review of data permissions disseminated through the CDSP, however data access should be considered on a case-by-case basis and that they would not support a blanket permission for this. PO confirmed that this was a comparison of permission provisions in Code and any third party access would be carried out through confidentiality agreements and additional contracts, giving the recent Meter Asset Provider as an example (iGT105).

The Workgroup compared Section K of the iGT UNC and Section 5 of the UNC. The Chair noted that the results of this initial review will be put into a paper to be prepared for the next meeting.

The areas identified as a concern are;

- Consumers;
- Contractor or Agent;
- SPAA;
- ETTOS;
- TRAS;

- Annex V5;
- Theft of Gas; and
- Gas Safety Visits.

**Action MWS18/03-05: CA to extract the review group findings into a paper to be presented at the next meeting.**

## **8. iGT Portfolio extracts – ‘Planned sites’**

RB introduced this issue which had been brought to the group’s attention by Centrica. RB noted that following the meeting last month an email was sent to all iGTs to ascertain their interpretation of the Code and to ask whether they currently include planned sites in their monthly portfolio extract. RB noted that she had not had many parties feedback on this issue, however, those that had do not show a consistent approach across the industry. One iGT did include these in their extract (similarly BU-UK and ESPUG stated that they also include them). However, another did not and noted the reason for this is due to Shippers only using this to validate their billing files. KD noted that this was once the case, however, new processes have been introduced which involves new triggers for billing.

The Workgroup were all in agreement that the Code’s intention is to have planned sites included in the portfolio. The definition of the MPR on the Extract specifically states the words "or will be" connected to the gas network and the Meter Point Status Code has a definition PL - Planned.

The Chair highlighted that the legal text in part G reads ‘The Pipeline Operators shall provide a Portfolio Extract to each Pipeline User by the fifth Business Day of each month with details of Supply Meter Points as of the first Business day of that month.’ And does not specify whether these are live meter points.

KD suggested that all iGTs are contacted to ascertain whether they are willing to change their processes to incorporate planned sites as per the understood intention of the code and an expectation of when iGTs can deliver this. The Workgroup resolved that the Code Administrator would be best placed to address this issue.

**Action MWS18/03-06: CA to send out an email to all iGTs to ascertain whether they are willing to change their processes to incorporate planned sites as per the understood intention of the code and an expectation of when iGTs can deliver this by.**

## **9. PSR Process – Revised PSA data (Meter Point)**

RB introduced this issue which had been brought to the group’s attention by BU-UK. NR noted that they have been approached by a Shipper who has queried whether Meter Plot information should be included in the PSA. NR added that BU-UK currently does include this information on the revised PSA and that Code is not clear either way on what should/shouldn’t be included. RB noted that following the meeting last month an email was sent to all iGTs to ascertain their interpretation of the Code and to ask whether they currently include meter point data in their revised PSAs. RB reiterated that she



had not had many parties feedback on this issue. The one iGT which had replied does include this information in their revised PSA noting that this is the preferred method for many of their Shippers.

The Workgroup resolved that BU-UK should go back to the Shipper in question and let them know that if they would like to raise a modification to discuss this issue further they can progress the issue that way.

## **10. iGT UNC Known Issues register**

The Workgroup reviewed the current items recorded on the known issues register

### **Housekeeping of the iGT RGMA Guidance**

The Workgroup discussed the iGT RGMA Guidance document which will need to be aligned with the ongoing changes in SPAA. RJ noted that Katy Binch is developing the document and resolved to take away an action to see if this document will need to come back to the Workgroup before June 2018 to make sure this is fit for purpose after the SPAA changes have been implemented.

**Action MWS18/03-07: RJ to follow up with Katy Binch that the iGT RGMA Guidance document is progressing with all SPAA changes and whether this needs to be sent back to the Workgroup for comment.**

**Action MWS18/03-08: CA to update the Known issues register.**

## **11. AOB**

### **iGT UNC Branding**

NR noted that the AIGT have queried why the small 'i' in iGT UNC is still being used as they had a recent rebrand and would like all parties to use a capitalised 'I'. NR acknowledged that this would be a big task working through the Code, Ancillary Documents and the Website and suggested that Gemserv should propose whether they would have the capacity and the cost of this extra work to go back to the AIGT. The Chair noted that there may need to be a modification raised to enable this, however, suggested that it goes much further than the Code noting that Ofgem, the UNC and other industry parties all reference using the small 'i'.

NR resolved to speak with Jon Dixon (Ofgem) regarding this and gaining some steer on this should be undertaken.

### **RG004 – Review group Governance Arrangements**

MJ noted that SSE has raised a review group request to look into the current provisions of the iGT UNC governance arrangements and requested initial feedback from the Workgroup. The Workgroup was generally supportive of opening up the conversation of the future of the iGT UNC.

The review proposal covers three areas of discussion including;

- Amalgamating the iGT UNC into the UNC and having any iGT specific areas as an Ancillary document;
- Creation of a 'Super Modification' which would bridge both codes and would effect change using a standard process; or
- Amending the iGT UNC to point over at a very high level, which would eliminate the need to create the volume of alignment modifications currently processed.

PO noted that there may be some hurdles involved in amalgamating some iGT specific areas of Code under the current UNC governance arrangements as these could be vetoed by the Panel etc.

NR noted that the Code Administrator should send out a specific email to iGTs to encourage their active participation in this review group. KD noted that this also extends to a wider representation of Shippers and requested that it is also extended to them.

The Chair resolved that the Code Administrator should send out two emails, one to the full distribution list and another specifically to iGTs.

**Action MWS18/03-09: CA to send out two emails: One to all iGTs to encourage their active participation in RG004 review group and another to the wider distribution list to encourage Shipper participation.**

**The next iGT UNC Modification Workstream Meeting is on 3<sup>rd</sup> April 2018.**



## Appendix 1

|             |                               |  |    |                        |
|-------------|-------------------------------|--|----|------------------------|
| MWS17/11-05 | 7 <sup>th</sup> November 2017 | <b>NR to draft a modification proposal to change the CSEP NExA Table.</b>  | NR | <b>Carried Forward</b> |
| MWS18/01-02 | 9 <sup>th</sup> January 2018  | Nicky Rozier (BU-UK) to raise a FT modification to correct the Code with regards to Consumption adjustment reads.  | NR | Closed.                |
| MWS18/02-01 | 6 <sup>th</sup> February 2018 | <b>CA to discuss the various approaches to contact lists across all Codes at the next CACoP meeting.</b>   | CA | <b>Carried Forward</b> |
| MWS18/02-02 | 6 <sup>th</sup> February 2018 | CA to update the Cross-Code modification implications tracker to close all modifications which do not implicate the iGT UNC.                               | CA | Closed.                |
| MWS18/02-03 | 6 <sup>th</sup> February 2018 | Paul Orsler (Xoserve) to review the legal text of UNC632 to ascertain whether there is a catch-all statement which would include iGT details.              | PO | Closed.                |
| MWS18/02-04 | 6 <sup>th</sup> February 2018 | CA to review the legal txt for UNC434 and speak with the Joint Office with regards to an internal review and any possible implications.                    | CA | Closed.                |
| MWS18/02-05 | 6 <sup>th</sup> February 2018 | PO to speak with Andrew Margan (Centrica) to ascertain whether the change in legal text for 640S could impact the iGT UNC legal text for iGT 106.          | PO | Closed.                |
| MWS18/02-06 | 6 <sup>th</sup> February 2018 | CA to send over review group request template to PO to raise a review group on data sharing permissions.   | CA | Closed.                |
| MWS18/02-07 | 6 <sup>th</sup> February 2018 | CA to send out an email to all iGTs to ascertain their interpretation of the Code with regards to including planned meter points in the portfolio extract. | CA | Closed.                |
| MWS18/02-08 | 6 <sup>th</sup> February 2018 | CA to update the Known issues register and create a new tab dedicated to cross-code modifications being monitored for impacts on the iGT UNC.              | CA | Closed.                |
| MWS18/02-09 | 6 <sup>th</sup> February 2018 | CA to send out an email to all iGTs to ascertain their interpretation of the Code with regards to including Meter Plots in revised PSRs.                   | CA | Closed.                |

|             |                            |  |    |     |
|-------------|----------------------------|--|----|-----|
| MWS18/03-01 | 6 <sup>th</sup> March 2018 | CA to update the Cross-Code modification implications tracker to close all modifications which do not implicate the iGT UNC.   | CA | New |
| MWS18/03-02 | 6 <sup>th</sup> March 2018 | CA to review the legal text of UNC632 to ascertain whether there is a catch-all statement which would include iGT details.   | CA | New |
| MWS18/03-03 | 6 <sup>th</sup> March 2018 | KD to raise a FT modification to bridge the current gap in Code as a result of the UNC434 review.  | KD | New |
| MWS18/03-04 | 6 <sup>th</sup> March 2018 | CA to finalise the Workgroup report for iGT103 and add this to the Final Agenda for the March Panel meeting.   | CA | New |
| MWS18/03-05 | 6 <sup>th</sup> March 2018 | CA to extract the review group findings into a paper to be presented at the next meeting.  | CA | New |
| MWS18/03-06 | 6 <sup>th</sup> March 2018 | CA to send out an email to all iGTs to ascertain whether they are willing to change their processes to incorporate planned sites as per the understood intention of the code and an expectation of when iGTs can deliver this. | CA | New |
| MWS18/03-07 | 6 <sup>th</sup> March 2018 | RJ to follow up with Katy Binch that the iGT RGMA Guidance document is progressing with all SPAA changes and whether this needs to be sent back to the Workgroup for comment.  | RJ | New |
| MWS18/03-08 | 6 <sup>th</sup> March 2018 | CA to update the Known issues register.  | CA | New |
| MWS18/03-09 | 6 <sup>th</sup> March 2018 | CA to send out two emails: One to all iGTs to encourage their active participation in RG004 review group and another to the wider distribution list to encourage Shipper participation.  | CA | New |