

## **iGT UNC Modification Panel Meeting 18-02**

**Wednesday 21<sup>st</sup> February 2018**

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

<b>Attendee</b>	<b>Organisation</b>	<b>Representing</b>	<b>As</b>
Steve Ladle (SL)	Gemserv	Code Administrator	Chairman
Mark Jones (MJ)*	SSE Energy Supply	Pipeline Users	
Cher Harris (CH)*	Indigo Pipelines	Pipeline Operator	
Rob Johnson (RJ)*	ESPUG	Pipeline Operator	
Jenny Rawlinson (JR)*	BU-UK	Pipeline Operator	
Roberta Fernie (RF)*	Ofgem	Authority	
Paul Orsler (PO)*	Xoserve	CDSP	
Paul Rocke (PR)	Gemserv	Code Administrator	
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. Rob Johnson (ESPUG) was nominated as the alternate for Victoria Parker. Mark Jones (SSE) was nominated as the alternate for both Andrew Margan (Centrica) and Kirsty Dudley (E.ON).

### **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 RB noted that she would like to discuss the Ofgem Code Administrator Survey as AOB.

### **3. Approval of the previous minutes**

RB informed the Panel that no comments had been received regarding the January Panel meeting minutes before the meeting. The minutes from the previous Modification Panel meeting (17<sup>th</sup> January 2018) were approved as a true and accurate record of the meeting.

### **4. Outstanding actions**

18/01-01	Code Administrator to send the Draft Modification Report for iGT106 out for Consultation with the closing date of 7th February 2018.	Completed. Closed.
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18/01-02	Code Administrator to add an additional question to the Consultation to ask about implementation timescales and alignment to the UNC.	Completed. Closed.
18/01-03	Code Administrator to send an email out on 18th January to ask parties to whether they would object to iGT104 being implemented 16 days after a Panel decision in an extraordinary release.	Completed. Closed.

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

## 5. Short Notice business

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

PO introduced this modification to the Panel 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.

PO noted that UNC431 introduced meter point reconciliation procedures into the UNC pre-nexus, however at the time this modification was implemented both GT and iGT details were not held in one single register, therefore iGT data was specifically omitted from the modification. Post-nexus there is now a need to align both Codes to incorporate this process for iGT data. The Chair noted that there is currently a modification in the UNC which is mirroring these changes (UNC641S) and has been sent back to a workgroup for further development. The Chair added that the change notice period has been extended from 20 days to 90 days as per the updated UNC modification.

MJ queried whether an iGT exercise could be carried out without GT data as a reconciliation of GT data had been carried out in 2016/17. PO took an action to gain more understanding of if this would be possible, and the Chair resolved to take the discussion forward to a Workgroup.

The Panel agreed to accept the modification and for it to be sent to a minimum of one Workgroup.

**Action 18/02-01: Code Administrator to add iGT103 to the March Workstream meeting agenda.**

## 6. Panel Decision

None.

## 7. Update on Modification Workgroups

None.

## **8. Withdrawn Modifications**

None.

## **9. Urgent Modification Proposals received**

None.

## **10. Non-urgent Modification Proposals received**

None.

## **11. Fast-track Modification Proposals received**

None.

## **12. Review Group Proposals received**

### [RG003 - Review of data permission provisions within the iGT UNC](#)

The Chair introduced this review group request received by Xoserve. This review group was initially discussed during the February Workstream meeting and will seek to review both the iGT UNC and UNC to understand any gaps there may be in data permissions, and will primarily focus on Part K of the iGT UNC. The Chair noted that there have been several recent modifications raised to address areas in the iGT UNC which deals with data permissions and the review group would look to assess whether the treatment of iGT Supply Meter Points affords the right level of cover to those involved parties, and ensures sites contained within iGT portfolios are equitably treated as those which reside on larger Gas Transporter networks.

The Chair also noted that the request includes a Terms of Reference for the Workgroup, looking at specific areas to discuss and would look to produce a report for the iGT UNC Panel.

The Chair opened up discussions to the Panel on whether there were any comments regarding the review group request for RG003. JR noted that this seemed sensible considering the volume of recent modifications raised around permissions, however highlighted that the Workgroup should keep in mind the consideration of permissions vs access. JR elaborated that the Code may already have sufficient wording in place to allow the CDSP to share iGT Data as an extension of the iGT. However, permissions should be dealt with on a case-by-case basis as these are individual cases with third parties and would often require their own agreements to be in place before any data is provided to them.

The Chair suggested that this should be added as a topic for discussion for the Workgroup. The Panel agreed to add the issue of access rules to the terms of reference.

**Action 18/02-02: Code Administrator to add another topic for discussion to the RG003 (data permissions) review group of access rules for third parties.**

The Panel agreed to accept this review group request and for this to be added to the March Workstream agenda.

**Action 18/02-03: Code Administrator to add RG003 (data permissions) review group to the March Workstream agenda.**

### 13. Workgroup reports

None.

### 14. Final Modification Reports update

#### iGT104

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

The Chair summarised the consultation responses received noting that two pipeline operators and five pipeline users responded. The Panel agreed with the proposer's view that this modification should proceed under self-governance rules, and agreed that the legal text supported the solution.

The Panel also discussed the unanimous support received during the consultation period for an early implementation of this Modification including one respondent who has suggested that the proposal should be implemented as soon as the Self-Governance Appeal window has closed. The Code Administrator noted that an email was sent out to industry on 18th January 2018 to seek any dissenting views on early implementation, however, no comments were received by industry. Panel members agreed that this Modification meets the criteria set out in Objective D (Securing of effective competition) and Objective F (Promotion of efficiency in the implementation and administration of the Code).

The Panel voted on iGT104 with all present Panel members (All alternates had received direction from their Panel member representatives prior to the meeting). The Panel voted unanimously to implement this modification. The Panel discussed possible implementation dates for this modification and agreed that there was enough urgency to warrant a special release as soon as possible following a full 15-day appeal window had elapsed. The implementation date for this special release will be 22nd March 2018.

**Action 18/02-04: Code Administrator to notify all parties that iGT104 has been decided by the Panel and will be scheduled for implementation in a special release scheduled for 22<sup>nd</sup> March 2018.**

## iGT105

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

The Chair summarised the consultation responses received noting that two pipeline operators and two pipeline users responded. The Panel agreed with the proposer's view that this modification should proceed under self-governance rules, and agreed that the legal text supported the solution.

JR noted that in BU-UKs consultation response they believe the correct Objective this modification better facilitates is Objective B (Co-ordinated, efficient and economic operation of the combined pipeline system) on the proviso that the combined pipeline system includes the metering equipment, however, Panel members resolved that this Modification meets the criteria set out in Objective D (Securing of effective competition).

The Panel voted on iGT105 with all present Panel members (All alternates had received direction from their Panel member representatives prior to the meeting). The Panel voted unanimously to implement this modification. The Panel discussed possible implementation dates for this modification and agreed that to facilitate the efficiency of code release management this modification should be in line with the proposed special release date for iGT104. The implementation date for this special release will be 22nd March 2018.

**Action 18/02-05: Code Administrator to notify all parties that iGT105 has been decided by the Panel and will be scheduled for implementation in a special release scheduled for 22<sup>nd</sup> March 2018.**

## iGT106

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

The Chair summarised the consultation responses received noting that two pipeline operators and two pipeline users responded. The Panel agreed with the proposer's view that this modification should proceed under self-governance rules as the principals of access had already been fully developed by iGT095VV. JR questioned the agreements that would be in place to ensure that data was not available for any Supplier to access without measures in place. PO and the Chair noted that the necessary provisional were included in the legal text via the following clause 'where the Supplier has received consent from the domestic consumer associated with the Supply Point and where they have entered into confidentiality and service agreements (on terms no less onerous than those in paragraph 23) and reasonable access conditions.'

### **Legal Text**

The Chair noted that during this modifications consultation period it was identified that the legal text for UNC640 had changed, omitting two data items out of the UNC legal text which still appear in the modification consulted on by industry. The Panel discussed the changes made and the suggested amendments and were satisfied that the legal text still delivered the principals outlines in the solution.

The Panel unanimously agreed to make suggested changes to the legal text to align this modification with UNC640S. The Panel agreed that changing the text did not present a significant material impact and it would not need to be re-sent for consultation.

Panel members agreed that this Modification meets the criteria set out in Objective D (Securing of effective competition).

The Panel voted on iGT106 with all present Panel members (All alternates had received direction from their Panel member representatives prior to the meeting). The Panel voted unanimously to implement this modification, and agreed that an implementation date should be in line with the UNC's expected implementation date of UNC640S. At the time of the iGT Panel decision the UNC Panel had not approved UNC640S as this was out for Consultation until 8th March and would be presented to the March Panel.

**Action 18/02-06: Code Administrator to notify all parties that iGT106 has been decided by the Panel and will be scheduled for implementation in line with UNC640S.**

## **15. Brexit Preparedness**

PR updated the Panel on the activities of the workshop on EU Brexit preparations being held by Ofgem. At the workshop meeting on 26th January 2018, Ofgem presented indicative findings from joint analysis of licence conditions and industry Code trawls, and presented its expectations of how any necessary modifications should be delivered.

Ofgem considered that there are no provisions within licence or Code which are likely to prove legally inoperable on exit day – that is, there will be no circumstance where an entire condition, licence or Code provision would fail from a legal perspective, resulting in a regulatory gap. Ofgem expect that any licence changes will begin in October 2018 and will run concurrently with any modification changes needed to the Codes due to the tightened timescales. It is expected that these modifications will be implemented in the February 2019 release.

The implications for the iGT UNC are minimal as any reference to the EU is isolated to one section of the Code which covers European Modifications.

The Panel noted the update.

## **16. Authority Update**

None.

## **17. AOB**

### **Ofgem Code Administrator Survey**

RB noted that Ofgem are intending on running their CA survey again this year and have carried out a procurement process to secure a third party to carry out the survey. Ofgem have indicated that 'Future Thinking' will be carrying out the survey and this will take place annually over the next three

years. In the same way as last year, National Grid will be acting as the conduit between industry Codes and the third party with regards to invoicing of the survey. National Grid have approached all CAs in the last week with a proposal to carry out the invoicing with the charging methodology as last year, with a proportionate share for larger and smaller Codes. RB noted that CAs have not yet been given a figure for the survey, however, we are expecting that this will be less than the previous year as less preparation work will be needed before the survey can go live.

RB noted that iGTs will be updated in due course when more information is available.

**The next Modification Panel meeting will be convened on 21<sup>st</sup> March 2018.**

## Summary of Actions

Action Reference	Date	Action	Owner	Status
18/02-01	21 <sup>st</sup> February 2018	Code Administrator to add iGT103 to the March Workstream meeting agenda.	CA	New
18/02-02	21 <sup>st</sup> February 2018	Code Administrator to add another topic for discussion to the RG003 (data permissions) review group of access rules for third parties.	CA	New
18/02-03	21 <sup>st</sup> February 2018	Code Administrator to add RG003 (data permissions) review group to the March Workstream agenda.	CA	New
18/02-04	21 <sup>st</sup> February 2018	Code Administrator to notify all parties that iGT104 has been decided by the Panel and will be scheduled for implementation in a special release scheduled for 22 <sup>nd</sup> March 2018.	CA	New
18/02-05	21 <sup>st</sup> February 2018	Code Administrator to notify all parties that iGT105 has been decided by the Panel and will be scheduled for implementation in a special release scheduled for 22 <sup>nd</sup> March 2018.	CA	New
18/02-06	21 <sup>st</sup> February 2018	Code Administrator to notify all parties that iGT106 has been decided by the Panel and will be scheduled for implementation in line with UNC640S.	CA	New