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. Finally, the group would also review the skeleton draft work group report which had been started since the last 039 meeting.

2) **Review of actions**

1) JD to undertake further analysis on SSP funding.

   GH confirmed that he had spoken to JD who had summarised current thinking on this (see agenda item 5) but the group agreed to keep the action open until Ofgem had formally confirmed how this area would be progressed – **carried over**

2) GH to speak to JD about potential options to progress Xoserve development cost recovery.

   GH confirmed that he had spoken to JD who had summarised current thinking on this (see agenda item 5) but the group agreed to keep the action open until Ofgem had formally confirmed how this area would be progressed – **carried over**

3) GH to include changes up to v8.1 of the IGT UNC into draft text.

   GH confirmed that the changes for v8.1 had been added to the IGT039 drafting – **closed**

4) AM to check process for Supply Point Commodity Rate Renominations and whether will apply to IGT networks.

   AM confirmed that this fed back to GH and that this was not required. GH confirmed that the carve out had been included in the Part CI drafting – **closed**

5) GH to review CI 14.4 to see only applies to Class 1 supply points.

   GH confirmed this had been reviewed and an amendment made to 14.4(a) – **closed**

6) GH to amend CI para 9 in line with comments table.

   GH confirmed that the amendment had been made – **closed**

7) AM to identify meter inspection section of UNC so this can be referenced in the IGT UNC.

   It was confirmed that meter inspections are not covered under the UNC itself. GH confirmed that the IGT UNC drafting had been amended to mirror the UNC – **closed**

8) GH to produce and circulate a comments table for drafting feedback.

   GH confirmed that this had been completed and circulated to parties. – **closed**
3) General Progress Update
GH summarised that the AIGT tender had concluded and that the AIGT had a preferred firm to undertake the legal review of the IGT039 drafting. GH confirmed that there were a number of areas which needed clarifying which would then allow the AIGT to formally commence the external legal review. As such, the timeframe for the review had slipped from that originally set out and GH confirmed he had a call the following day with the preferred legal firm to go through the outstanding queries on the tender which would then allow the review itself to commence. GH agreed to provide an update following his call with the external law firm.

Action – GH to provide an update on the external legal review following his call with the law firm.

4) Legal Drafting Review and Feedback
SL observed that the current drafting did not have a plain English summary explaining how each section of the Code operated under SSP which had been agreed in earlier meetings. The group noted that a new paragraph had been added to Section A to describe the legal workings of the Code but it was noted that this wasn’t sufficient to achieve a plain English summary. GH agreed to add a plain English summary ahead of the next meeting.

SL commented that there would be a large IGT UNC release in October and asked how this would impact the drafting. GH confirmed that depending on the timing of IGT039 proceeding to consultation, the changes could be worked into the IGT039 draft or if the consultation process had already started, a transition mod(s) would be required to update the text.

The group discussed the changes made following the last meeting. The following tables outline the changes and discussion points for each section of the IGT UNC:

### Part A

<table>
<thead>
<tr>
<th>Para</th>
<th>Update</th>
<th>WG Observation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>Inclusion of and description of IGTAD which replaces CSEP NExA</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>5</td>
<td>New clause which ties in provisions of the UNC and how these are to be interpreted. This is a key change to the document since the last update and also allows for changes under the UNC to take effect without requirement for IGT UNC change</td>
<td>ok</td>
<td>-</td>
</tr>
</tbody>
</table>

### Part B

<table>
<thead>
<tr>
<th>Para</th>
<th>Update</th>
<th>WG Observation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>No changes to this section since last draft</td>
<td>ok</td>
<td>-</td>
</tr>
</tbody>
</table>

### Section CI

<table>
<thead>
<tr>
<th>Para</th>
<th>Update</th>
<th>WG Observation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.2e</td>
<td>x3 types of AQ and x2 types of Supply Point Capacity (SOQ) now listed as a requirement to be held in the</td>
<td>Should “entry SOQ” also be listed?</td>
<td>Will be looked into. Currently SOQ is only provided for non-</td>
</tr>
</tbody>
</table>
In addition to the changes above, the group also discussed whether under D7.3, the term “Meter Fit Report” was sufficient as JK believed this to be a term used in UK link which may cause confusion for parties. It was understood that the .CD file would in practice be the flow that would be used and that this could be referenced in the IGT UNC. AM took an action to confirm if the .CD was the correct flow for such purposes.

The group also discussed how the process would work where meter fit information is provided late by the IGT and whether a Shipper would be able to reject the information. The
group agreed that as the process was commercially orientated, the information would still go through the standard process of being registered in Agency systems but that Shippers should contact the IGT directly where meter fit details have been provided late.

**Section E**

<table>
<thead>
<tr>
<th>Para</th>
<th>Update</th>
<th>WG Observation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>General</td>
<td>All definitions removed and wording effectively says that all meanings shall be set out in the UNC. This was as when pointing across, the terms under general no longer appeared in Part E. As some of the definitions appear elsewhere, Section M has been updated to point these definitions across to the UNC.</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>General</td>
<td>Preamble now brings out references in the TPD M where Transporter is to be read as Large Transporter rather than IGT as set out in Section A as activities are for Class 1</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>All</td>
<td>Language used has been amended to bring in line with other Parts where pointing across</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>2.43</td>
<td>Now removed as is in Section M and matches word for word</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>11</td>
<td>Must read text now added in - this points across to UNC but carves out the user pays drafting and effectively replaces with the current IGT UNC text</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>14</td>
<td>Pointed across as before but reference to User Pays has been replaced with NCUP</td>
<td>On the basis that User Pays costs for Xoserve will be recovered under the existing User Pays framework, reference to NCUP can be removed</td>
<td>Activity under MS.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.</td>
</tr>
</tbody>
</table>

**Section F**

<table>
<thead>
<tr>
<th>Para</th>
<th>Update</th>
<th>WG Observation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.2</td>
<td>Removed as the rolling AQ process will no longer refer to relevant metered period under para 6</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>6</td>
<td>Removed in line with the amendments to para 4</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>1.13</td>
<td>IGT Arrangements Document ref updated to IGTAD</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>1.13</td>
<td>IGT Arrangements Document ref updated to IGTAD</td>
<td>ok</td>
<td>-</td>
</tr>
<tr>
<td>Appendix F1</td>
<td>LMN rejection codes removed as will not be applicable under SSP</td>
<td>ok</td>
<td>-</td>
</tr>
</tbody>
</table>

It was questioned whether the text under 11.1-11.3 could be removed. GH agreed to speak to SL (who had left the meeting at this point) and review the drafting.

**Section I**

<table>
<thead>
<tr>
<th>Para</th>
<th>Update</th>
<th>WG Observation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.13</td>
<td>IGT Arrangements Document ref updated to IGTAD</td>
<td>ok</td>
<td>-</td>
</tr>
</tbody>
</table>

**Section J**

<table>
<thead>
<tr>
<th>Para</th>
<th>Update</th>
<th>WG Observation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>No changes to this section since last draft</td>
<td>ok</td>
<td>-</td>
</tr>
</tbody>
</table>

**Section K**

<table>
<thead>
<tr>
<th>Para</th>
<th>Update</th>
<th>WG Observation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>Expanded so now provisions apply to a third party on</td>
<td>ok</td>
<td>-</td>
</tr>
</tbody>
</table>
GH asked parties whether they would prefer to formally review the draft text at this stage or wait until the text has been reviewed by the AIGT’s appointed external law firm. The group was happy to wait until the external review had taken place before formally reviewing the drafting. GH confirmed that once the feedback from today’s meeting had been reviewed and where necessary worked into the drafting, the draft would be circulated for parties to familiarise themselves with ahead of the formally reviewed drafting being circulated.

Action – GH to add a plain English summary to each section.  
Action – AM to confirm if the .CD file is the correct flow for meter fit report purposes..  
Action – GH to speak to SL regarding the text in F11.1-11.3.

5) Update on Funding Issues  
GH confirmed that he had spoken to JD who had provided a general overview on the thoughts around the issues previously raised. GH provided an informal update on the basis that JD would be able to provide a formal update in due course:

i) **Annual cost of Agency Services and cost split**  
It is expected that a methodology will underpin the IGT contribution to Agency Services which is being developed by Ofgem. This will be based on the equivalent allowance IGTs receive for agency services under RPC. It is anticipated Ofgem will provide a formal update on this and any potential consultation regarding IGT licence conditions.

ii) **Agency costs for future modifications**  
Though subject to confirmation, it is anticipated that future Agency development costs would be recoverable using existing industry mechanisms i.e. User Pays. As such, IGTs would not require User Pays specifically in the IGT licence or IGT UNC. Again, it is anticipated Ofgem will provide a formal update on this in due course.

6) Review of Issues Log  
GH ran through the issues log confirming that prior to the meeting, all issues on the log had been addressed through the IGT039 legal drafting. GH agreed to add the points raised in the meeting to the log so that these can be recorded and actioned accordingly. The status of the log (including new issues from meeting #25) can be found in Appendix 1.
7) **Review of Skeleton Work Group Report**
GH summarised that there had not been any progress with the work group report due to the focus on progressing the legal drafting. With the drafting very much at a complete first draft stage and being handed over to external lawyers for review, GH expected that more time would be available to progress the report ahead of the next meeting.

8) **Next Steps and Work Plan Review:**
In terms of next steps, GH confirmed that he had a teleconference with the AIGT’s preferred legal firm the next day to discuss some of the points raised with the scope of the work (see agenda item no. 3). As such, it was difficult at this stage to provide an update on the timeframes for completion but GH would update and circulate these once they become clearer.

In terms of the work group report, there hadn’t been any material progress due to the focus on the legal drafting. However, once the external legal review had commenced, this should provide time for the workgroup report to progress.

SL commented that there will be a number of changes required to the impacted ancillary documents as a result of the drafting changes. GH confirmed these areas are currently listed in the workgroup report as requiring amending outside of the 039 modification itself.¹

9) **Future Meeting Dates:**
The next meeting will be held via teleconference on Thursday 21st August starting at 10am. GH will be on leave 22/08 – 01/09 and it was anticipated that the external legal review should be well under way by 21/08 and should also allow enough time for the comments raised at meeting #25 to be addressed.

10) **AOB:**
There was no AOB

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**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 provide an update on the external legal review following his call with the law firm.
4) GH to add a plain English summary to each section.
5) AM to confirm if the .CD file is the correct flow for meter fit report purposes.
6) GH to speak to SL regarding the text in F11.1-11.3.

---

¹ Agreement on where and when this work is to be taken forwards will be discussed at the next IGT039 meeting.
### Appendix 1 – Issues Log as of 2nd July 2014.

<table>
<thead>
<tr>
<th>Part</th>
<th>Paragraph</th>
<th>Raised by</th>
<th>Comment</th>
<th>Response</th>
<th>Action Complete?</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>2</td>
<td>GH</td>
<td>This could be where RDL new drafting on overview and interpretation sits in the IGT UNC</td>
<td>Complete under A5</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>2.10</td>
<td>GH</td>
<td>Look at removing as this will no longer be applicable (check how bulk confirmations are referenced however)</td>
<td>Keep in as there may be some areas which are still used such as PSR process. Where currently there is the option to deviate to the &quot;Manual&quot; under SSP, all references have been removed</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>GH</td>
<td>NExA description needs review i.e. should all refs be updated to IGTAD or should this simply say &quot;or future replacement documents&quot;.</td>
<td>IGTAD reference used</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Plain English Summary required

<table>
<thead>
<tr>
<th>Part</th>
<th>Paragraph</th>
<th>Raised by</th>
<th>Comment</th>
<th>Response</th>
<th>Action Complete?</th>
</tr>
</thead>
<tbody>
<tr>
<td>B</td>
<td>3</td>
<td>GH</td>
<td>Needs tidying up as still refers to LMNs</td>
<td>Drafting updated</td>
<td>Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Part</th>
<th>Paragraph</th>
<th>Raised by</th>
<th>Comment</th>
<th>Response</th>
<th>Action Complete?</th>
</tr>
</thead>
<tbody>
<tr>
<td>CI</td>
<td>General</td>
<td>GH</td>
<td>C1 3 of the IGT UNC is Called Daily Read Requirement &amp; C1 5 Supply Point Classification. This ties to UNC G1.5 &amp; M6.2 respectively but there are cross overs in content</td>
<td>CI 3 renamed classes of supply point and this part carved out of CI 5</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>1.2</td>
<td>SL</td>
<td>1.2 should stay in IGT UNC as sets out one user per supply point rule</td>
<td>ok</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>2.2</td>
<td>JK</td>
<td>Should &quot;entry SOQ&quot; also be listed as a required field?</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.8-2.12</td>
<td>JK</td>
<td>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</td>
<td>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</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>GH/RDL</td>
<td>Daily read equipment needs further review as could be defined in UNC (is referred to in part D)</td>
<td>CI 3.5(b) has been drafted to make it clear that the equipment and responsibilities are those of the GDN</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>3.6</td>
<td>RDL/AM</td>
<td>Will LDZ CSEP Ancillary Agreement still be correct terminology?</td>
<td>Yes - NEXA definition needs to be amended however</td>
<td>Y</td>
</tr>
<tr>
<td>5.5</td>
<td>to be pointed across but define &quot;days&quot; not business days</td>
<td>Complete</td>
<td>Y</td>
<td>AM/CW</td>
<td></td>
</tr>
<tr>
<td>6.1</td>
<td>AP</td>
<td>6.1 needs a way of carving out infill</td>
<td>Draft content now added to text</td>
<td>Y</td>
<td>GH</td>
</tr>
<tr>
<td>6.1</td>
<td>this section needs to refer to the x3 types of AQ and link to UNC for rolling AQ where possible</td>
<td>Draft content now added to text</td>
<td>Y</td>
<td>AM</td>
<td></td>
</tr>
<tr>
<td>6.2 &amp; 6.3</td>
<td>JK</td>
<td>May be an issue with infill with the current drafting as may be swept up with NExa table.</td>
<td></td>
<td></td>
<td>GH</td>
</tr>
<tr>
<td>6.3</td>
<td></td>
<td>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. SOQ is not defined using the same term in the UNC so need to identify this and understand if this achieves the same thing as SOQ - is this held by Xoserve?</td>
<td>Agreed at meeting #24 to retain as is not captured elsewhere</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>6.4</td>
<td></td>
<td></td>
<td>Defintion updated to align with UNC (&quot;Supply Point Capacity&quot;)</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>6.5(b)</td>
<td>IGTs will still undertake annual review of NExa table and Xoserve will provide the information to do this. Text needs to reflect this.</td>
<td>Draft content now added to text</td>
<td>Y</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.6</td>
<td>6.6 can be removed as follows GDN process</td>
<td>Removed</td>
<td>Y</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.1.2</td>
<td>8.1.2 can be removed as won't over ride IGT UNC arrangements. However changes needed to IGTAD to link them together</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9.1</td>
<td>See note - should TPD G2.2.4 be excluded?</td>
<td>Yes</td>
<td>Y</td>
<td>c</td>
<td></td>
</tr>
<tr>
<td>10.4</td>
<td>10.4 can be removed as class 1 will be DM mandatory so the clause will not be applicable post NEXUS</td>
<td>Removed</td>
<td>Y</td>
<td>RDL</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>RDL to consider</td>
<td>Parts of text pointed to the UNC</td>
<td>Y</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>RDL to revise opening paragraph drafting</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Teleconference 30th July 2014

<table>
<thead>
<tr>
<th>Time</th>
<th>Task</th>
<th>Resolution</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.6-8</td>
<td>Need to check if is DM or class 1</td>
<td>Y</td>
</tr>
<tr>
<td>18</td>
<td>Removed from UNC and not replaced - have emailed CW to ask why</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>Now mirrored in IGT UNC</td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Not clear what this is trying to achieve. Doesn’t appear in UNC so unlikely to be needed.</td>
<td>RDL to review as looks like poor layout/drafting - deleted</td>
</tr>
</tbody>
</table>

**CII**

- Points across but 5.6.3 refers to "total system"
- Needs to be covered off under UNC terminology section
  - Yes

**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
- 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.
  - Yes
- £7.00 Need to check with Xoserve whether they are involved in the re-establishment business process
  - Xoserve have confirmed their involvement in the process so have pointed across as will be dealt with in the same way
  - Y
- 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?
  - 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?
  - Retained in IGT UNC as a mixture of obligations and SSP process. Further complication as some of the definitions if pointed across won’t work as the definitions themselves have defined terms within
  - Y
- 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
  - 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
  - Y
**Teleconference**  
**30th July 2014**

<table>
<thead>
<tr>
<th>UNC</th>
<th>How does clamping work in terms of flows and can Xoserve support this?</th>
<th>agreed to align with GDN process</th>
<th>Y</th>
<th>Chris Warner</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Not for this mod but this section needs review</td>
<td></td>
<td></td>
<td>AM</td>
</tr>
<tr>
<td>6</td>
<td>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).</td>
<td>clarified under 7.2</td>
<td>Y</td>
<td>GH</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>E</th>
<th>1.5.2 Daily read Equipment is now referred to as &quot;Transporter&quot; Daily read Equipment - why is this? Is this so that it refers to class one specifically?</th>
<th>Yes</th>
<th>Y</th>
<th>GH/SL</th>
</tr>
</thead>
<tbody>
<tr>
<td>18</td>
<td>This points to data ownership under K25 so needs to be retained in IGT UNC</td>
<td>Retained and tweaked to extend to 3rd party systems operated on behalf of the IGT</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>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 all ok. Is covered off under para 13 which is correct.</td>
<td>Y</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>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.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| F   | 11.1-11.3 JK Review of paras required as may no longer be required |                               |   | 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         |

<p>| K   | 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 |              |</p>
<table>
<thead>
<tr>
<th>25.1</th>
<th>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.</th>
<th>k25.1 25.1 updated to extend to 3rd party systems operated on behalf of the IGT</th>
<th>Y</th>
</tr>
</thead>
<tbody>
<tr>
<td>Para 34 relates to notices and communication &quot;other than one which is given as a System Communication&quot;. &quot;Systems Communication&quot; definition has been expanded to include UK Link so is now ok</td>
<td></td>
<td></td>
<td>CW</td>
</tr>
</tbody>
</table>

34 | May need reference to UK Link | Y | CW |