IGT039 Meeting #29
FINAL Minutes

Participants:
Colette Baldwin (CB)* Eon Steve Ladle (SL) Gemserv
Raoul De Lange (RDL) GTC Kristian Pilling (KP) SSE
Bryan Hale (BH)* EDF Marianne Russell (MD)* Eon
Gethyn Howard (GH) (Chair)* GTC Kiran Samra (KS) Npower
Jonathan Kiddle (JK) EDF

1) Introductions
GH opened the meeting by welcoming everyone to the meeting, noting his apologies for having to dial in rather than being at the meeting itself. GH confirmed that the intention of the meeting was to review the comments that had been received on the legal text and then to discuss whether any further changes were required to bring the drafting which is based on v8.1 of the IGT UNC up to v8.3 to reflect the October and November releases.

CB requested that it be minuted that it was disappointing that following a 4 week review period on the legal text that the only comments were provided the day before the meeting which had not allowed for sufficient preparation for the ensuing discussion.

2) Legal Drafting Review
4 observations had been raised for discussion by KP of SSE with the final observation also being raised by BH of EDF. The discussion around each observation is outlined below:

i) That where a GDN deems it not to be practicable or economic to satisfy the class 1 read requirement, that the IGT should provide the service.

KP confirmed prior to the discussion stating that this observation was to be retracted, noting that the requirements are based on the current IGT UNC drafting with the reference to DM read requirements being amended to class 1 read requirement. The group agreed that no changes were required for the purposes of IGT039 but CB took an action to review the requirements for GDNs to provide Class 1 read services against the backdrop of GT unbundled metering arrangements. It was agreed that if any changes are required to the DM arrangements in the future, that this would be subject to a separate review and change proposal.

ii) That the drafting under CI 12.12 is difficult to understand and could be improved.

The group agreed that the drafting was difficult to understand in its current form but noted that the drafting currently exists in the IGT UNC. BH suggested that the
drafting may be in its current form as a result of historic aggregated supply point arrangements which were no longer used. GH confirmed that this had not been amended on the basis that the definitions were not impacted by SSP and though he agreed the current wording was not clear, this was not the focus of the work carried out on the legal drafting as was not impacted by SSP. The group agreed to leave the text as is but was of the view that it would be a section which should be reviewed by the shipper work group and if required a future change raised to improve the text. GH agreed to add the paragraph to the work group report where a list of areas for future review is listed.

iii) **Suggest removing the pointing to of M4 paragraph 4 of UNC Section D paragraph 2.7 and refer to E2 of IGT UNC as this also points to M4 paragraph 4 of the UNC.**

RDL commented that both the current and proposed drafting approaches achieved the same output but the issue was that the current drafting approach had been used consistently throughout the whole IGT039 drafting. As such, if this paragraph were to be amended, for consistency all other paragraphs would need to be amended where this drafting style was used. The group agreed not to amend the paragraph.

iv) **Amend D7.1-7.3 as this would allow the IGT to directly update the supply point register with meter fit details which does not align with the process used on GDN networks, providing an unfair competitive advantage. EDF had also confirmed that this did not align with the process set out in the IGT SSP Business Requirements Document to which Xoserve were basing their system.**

GH confirmed that the intention was to follow the process set out in the IGT SSP BRD and the drafting had been retained as also existed in the UNC NEXUS drafting. GH confirmed that following the issue being raised, he conducted a further investigation and it appeared that the GDN process would only be relevant where special metering arrangements were in place which would not apply to IGT sites. GH agreed that the drafting in it’s current form was not required. The group discussed KP’s proposed revised drafting and agreed that subject to a number of minor stylistic amendments, the proposed drafting would be used.

The group also discussed the circularity of the term “meter fit report” and “meter information”. RDL agreed to review and amend this.

The group also discussed the following paragraphs 7.4 to 7.7 based on the issue highlighted by JK where currently a late meter fit report can be rejected where provided late by the IGT and the transportation charges refunded to this point. The issue outlined by JK was that under NEXUS, a .CD file cannot be rejected. Noting that the group were discussing operational processes rather than legal drafting, GH
confirmed that the drafting had been retained as SSP did not affect the right for the Shipper to enact this provision. The group agreed that there were 2 ways forwards; 
a) A manual email to the IGT requesting an invoice adjustment; or
b) A UK link change to allow a .CD file to be rejected (which would likely be implemented post NEXUS).
The group agreed that no decision could or should be made on how to progress under the IGT039 work but GH agreed to add to the list of areas for future review in the work group report should a party wish to progress this at a future date.

SL then provided an overview of the work he had completed reviewing the changes implemented to the IGT UNC under the October (v8.2) and November (v8.3) releases on the basis that it would be best practice to use the most up to date version of the IGT UNC for the baseline drafting.
It was agreed that there would be a clear line of work carried out by the Shipper work group which would be focusing on changes to the ancillary documents and the IGT039 development group which would be looking at any consequential changes to the IGT UNC legal text itself. The group agreed to review the proposed changes and feed back any comments to the IGT UNC with GH cc’d in by close of play 21st November which would allow sufficient time for any drafting changes to be incorporated into the final draft ahead of the next meeting on December 2nd.
GH agreed to check with Ofgem whether they would expect the full drafting of the mods to be included and redlined to remove/amend or simply to add the necessary change marked drafting into the text, noting that the first approach would require more work than the second approach.

CB highlighted that Xoserve may have concerns over the transmission of personal data and how this would be covered off for IGT networks. GH believed that this would be covered off under the IGT Agency Services Agreement by granting permissions set out in the IGT UNC to Xoserve as the IGT agent. GH agreed to talk to Xoserve regarding this.

Action – GH to add Paragraph CI 12.12 to work group report as an area for future review.
Action – RDL to amend proposed SSE drafting.
Action – RDL to amend circular reference s on “meter fit report” and “meter information”.
Action – GH to add rejection of meter fit report/.CD to work group report as an area for future review.
Action – All to review proposed v8.2 and v8.3 updates and feed back to IGT UNC with GH cc’d in by close of play 21st November.
Action – GH to speak to Ofgem to confirm preferred drafting approach for including v8.2 and v8.3 changes.
Action – GH to discuss transmission of personal data with Xoserve.
3) Future Meeting Dates:
December 2\textsuperscript{nd} for potential final IGT039 meeting at E.ON, 7th Floor, Davis House, 129 Wilton Road, London. SW1V 1JZ. It was agreed that should not all work be completed by this meeting, a further could be scheduled though it was not expected this would be required.

4) AOB:
There was no AOB

New Actions specific to Legal Drafting Discussions:
1) GH to add Paragraph CI 12.12 to work group report as an area for future review.
2) RDL to amend proposed SSE drafting.
3) RDL to amend circular reference s on “meter fit report” and “meter information”.
4) GH to add rejection of meter fit report/.CD to work group report as an area for future review.
5) All to review proposed v8.2 and v8.3 updates and feed back to IGT UNC with GH cc’d in by close of play 21\textsuperscript{st} November.
6) GH to speak to Ofgem to confirm preferred drafting approach for including v8.2 and v8.3 changes.
7) GH to discuss transmission of personal data with Xoserve.