

iGT UNC Modification Panel Meeting 15-12

Wednesday 16th December 2015

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee	Organisation	Representing	As
Steve Ladle (SL)	Gemserv	Code Administrator	Chairman
Cher Harris (CH) *	Indigo Pipelines	Pipeline Operators	
Kristian Pilling (KP) *	SSE Energy Supply	Pipeline Users	
Kirsty Dudley (KD) *	E.ON UK	Pipeline Users	
Kirandeep Samra (KS) *	npower	Pipeline Users	
Louise Deighan (LD) *	Ofgem	Authority	
Andrew Margan (AM) *	British Gas	Observer	
Paul Rocke (PR)	Gemserv	Code Administrator	

**Attended via teleconference*

1. ALTERNATES, APOLOGIES FOR ABSENCE, AND OBSERVERS

SL welcomed attendees to the final iGT UNC Modification Panel meeting of 2015.

Apologies for absence had been received from Kishan Nundloll (ES Pipelines) and Jenny Rawlinson (Brookfield Utilities). Cher Harris had agreed to act as the Alternate Representative for both Kishan and Jenny. During the meeting – during the consideration of the Workgroup Report for iGT080 – Kirandeep Samra left the meeting, and Kirsty Dudley agreed to act as the Alternate Representative for the remainder of the meeting.

2. CONFIRMATION OF AGENDA

The agenda was confirmed; no further items of business were raised.

3. MINUTES FROM THE PREVIOUS MEETING

Minutes from the iGT UNC Panel 15-11 were agreed as a true and accurate record of the meeting, subject to two amendments for clarification as raised by LD.

4. ACTIONS ARISING

There were no actions outstanding from the previous meeting.

5. SHORT NOTICE BUSINESS

None.

6. PANEL DECISIONS

None.

7. UPDATE ON DEVELOPMENT GROUPS

[iGT056 – UPRN Provision](#)

SL reminded the Panel that the Code Administrator had written to Ofgem following the October meeting, seeking guidance with respect to enforcing progress or withdrawal of the Modification which had been raised by E.ON in October 2013. Ahead of the meeting, Jon Dixon (Ofgem) had provided an update, noting that “thinking on iGT056 has been influenced by the recent recommencement of activity on the equivalent UNC0468...the UNC Panel had determined that UNC0468 will be issued for consultation no later than March 2016, providing a clear end date for completion of its development. [Ofgem] expects that the outcome of UNC0468 will be directly relevant to iGT056, therefore...it would seem premature to take steps to force the withdrawal of iGT056 or make it void”.

Whilst the update from Ofgem appeared to assume that development of UNC0468 would precede any further development of iGT056, Colette Baldwin (Proposer, E.ON) had also provided an update, explaining that she had “agreed to hold off from development of the Modifications whilst the [industry data quality] work concluded. Now that the [final data quality] reports had been presented to Panels, [Colette] is ready to amend and finalise the Modifications... [Colette] will be attending the iGT Modification Workstream in January 2016 to present the updated proposals and hopefully conclude the outstanding issues”.

KS noted her preference that iGT056 and UNC0468 continued to be developed in parallel, to ensure that iGTs were bought in to an eventual solution. SL noted that no updated Modification Proposal for iGT056 had been made available to the Code Administrator, and that further information would be necessary in advance of the Modification Workstream to allow for the effective development of the change. KD agreed to advise the Proposer that documentation for the Modification Workstream must be provided no later than 23rd December 2015.

Action 15-12-01: KD to advise Colette Baldwin that further documentation for iGT056 should be sent to the Code Administrator before 23rd December 2015, to allow a sufficient period for consideration ahead of the Modification Workstream on 5th January 2016.

[iGT071 - Updating the iGT AQ Review Procedures Ancillary Document](#)

SL noted that the workgroup for iGT071 had met briefly during the Modification Workstream on 1st December 2015. JR (as Proposer) had provided a proposed list of data items that iGTs would require to carry out its annual AQ review following the implementation of Single Service Provision. SL further noted that Xoserve would be carrying out a review of the requirements,

and would confirm Xoserve's capability to provide the data items to the iGTs ahead of the Modification Workstream on 2nd February 2016.

[iGT075 - Identification of Supply Meter Point pressure tier](#)

SL noted that a brief update had been provided at the Modification Workstream on 1st December 2015, whereby attendees had confirmed that they did not wish to progress a solution until the preferred solution within the UNC had been finalised. Furthermore, KD noted that Colette Baldwin (as Proposer) had prepared an update for the Panel, and had explained that discussions had taken place between Xoserve and the Consultant from the Association of Meter Operators (AMO), with a further meeting scheduled prior to Christmas to finalise the proposed business rules associated with a preferred solution. KD agreed to provide Panel feedback to the Proposer that any update should be provided by 23rd December, to allow for full consideration at the Modification Workstream on 5th January 2016.

[iGT079 - Adding Non-domestic New Connections Framework Ancillary Document](#)

The Panel welcomed AM to the meeting (as Proposer of iGT079) to provide a full update on the status of his Modification, which had been progressed through the workgroup by Adam Iles (British Gas) during a period of absence for the Proposer. AM noted that, since the previous Modification Workstream, he had taken the concerns of the workgroup into account and rewritten sections of the Modification to provide clarification with respect to both the scope of the change, and how the proposed amendments would impact on the existing nominations and confirmations registration process. AM further noted that he would seek to provide a full update ahead of the Modification Workstream on 5th January 2016, including a version of the Modification Proposal which was change-marked in comparison to the first iteration.

8. URGENT MODIFICATION PROPOSALS RECEIVED

None.

9. NON-URGENT MODIFICATION PROPOSALS RECEIVED

None.

10. FAST TRACK MODIFICATION PROPOSALS RECEIVED

None.

11. WORKGROUP REPORTS

[iGT078 - Ancillary Document for the New Connections process](#)

SL noted that the Workgroup Report for iGT078 had been published following the Modification Workstream on 1st December 2015. The Workgroup had met eight times between May and December 2015.

SL noted that the Workgroup had recommended that iGT078 did meet the criteria for Self-Governance, as there was no material impact on consumers, competition or the operation of the pipeline system. The Panel unanimously agreed that the iGT078 should proceed as a Self-Governance Modification.

With respect to the solution, KP noted his concern that suggestions raised by Anne Jackson (SSE) during the course of the workgroup development had not been incorporated into the final solution. Specifically, this referred to the ability of a Shipper to overwrite a MAM ID via the PS2, rather than rejecting a PS1 outright. SL noted that the workgroup thoroughly considered the point on 1st December 2015, and unanimously opted to revert to a solution whereby the Shipper could not overwrite an incorrect MAM; however, a specific rejection code was added for such instances, with a free text field available to note the correct MAM. KP had outstanding concerns that this may cause competition issues; however, the Panel did not share the concerns. SL encouraged any party to raise further issues through the consultation process.

The Panel unanimously agreed with the recommendation of the workgroup that iGT078 better facilitated Relevant Objectives D) “Securing of effective competition”, and F) “Promotion of efficiency in the implementation and administration of the Code”.

Whilst the Panel agreed with the workgroup that implementation of iGT078 and Single Service Provision changes were not interdependent, the Panel agreed that the question should be specifically drawn out during consultation. The Panel unanimously agreed that a six month implementation lead time would be appropriate for iGT078. SL noted that, based on the Modification Rules, the Final Modification Report (FMR) would be considered by the Panel in February 2016. AM asked the Panel to consider whether they could receive the FMR at short notice, in order that it could be progressed at the Panel in January 2016, to provide parties with the longest possible advance notice period. The Panel unanimously considered that they would require the full period to consider representations, as they could not be certain that responses via the consultation would be straightforward.

The Panel unanimously agreed to circulate iGT078 for consultation as a Draft Modification Report with a close-out date of 14th January 2016.

Action 15-12-02: Code Administrator to send iGT078 out for consultation as a Draft Modification Report with a close out of 14th January 2016.

Action 15-12-03: Code Administrator to publish the Self-Governance Statement for iGT078, noting that the Self-Governance Determination Date of 17th February 2016.

[iGT080 - Mandating iGT use of data as administered by the Pipeline Operators' Agency for Shipper Transportation Billing](#)

SL noted that the Workgroup Report for iGT080 had been published following the Modification Workstream on 1st December 2015. The Workgroup had met five times between June and December 2015.

SL noted that the Workgroup had recommended by split decision that iGT080 did meet the criteria for Self-Governance, as there was no material impact on consumers, competition or the operation of the pipeline system. The Panel agreed that the iGT080 should proceed as a Self-Governance Modification. CH considered that the Modification did not meet the criteria for Self-Governance, due to a potential material impact on the billing processes for iGTs. The Panel agreed that a question around self-governance should be drawn out as part of the consultation process.

With respect to the solution, CH noted her concern that the business rules lacked sufficient clarity to provide a full understanding of the purpose of the Modification. Specifically, CH did not agree with some of the wording around the provision of Supply Meter Point portfolios for billing, as Xoserve would only be providing delta files rather than full portfolios. Furthermore, CH was uncertain whether only the MPRN would be used to verify whether a Supply Meter Point was suitable for billing, or whether further data items were required to be provided. The remainder of the Panel was confident that the solution was appropriate, and all Panel Members agreed that the Legal Text fully met requirements. On this basis, CH was confident that the Modification could progress to consultation without further development by the workgroup.

The Panel agreed with the recommendation of the workgroup that the minimum lead time was required ahead of implementation of iGT080, and that the change must be aligned with the Project Nexus Implementation Date.

The Panel unanimously agreed to circulate iGT080 for consultation as a Draft Modification Report with a close-out date of 14th January 2016.

Action 15-12-04: Code Administrator to send iGT080 out for consultation as a Draft Modification Report with a close out of 14th January 2016.

Action 15-12-05: Code Administrator to publish the Self-Governance Statement for iGT080, noting that the Self-Governance Determination Date of 17th February 2016.

[iGT082 - iGT Single Service Provision, non-effective Days for cutover in 2016](#)

SL noted that the Workgroup Report for iGT082 had been published following the Modification Workstream on 1st December 2015. The Workgroup had met twice, in November and December 2015.

SL noted that the Workgroup had recommended that iGT082 did not meet the criteria for Self-Governance due to a material impact on consumers, specifically the impact on Suppliers' ability to meet faster-switching obligations during the non-effective period. The Panel unanimously agreed that iGT082 did not meet the criteria for self-governance.

The Panel agreed that the solution for iGT082 was appropriate, and the Legal Text wholly met the requirements of the solution. The Panel agreed with the workgroup recommendation that the Modification facilitated Relevant Objectives C) "Efficient discharge of the licensee's obligations", and F) "Promotion of efficiency in the implementation and administration of the Code".

The Panel agreed with the recommendations that the Modification should be implemented in the earliest release following an Authority decision to implement, and that the Legal Text would entirely overwrite the changes that had been anticipated to be implemented by iGT072.

The Panel unanimously agreed to circulate iGT082 for consultation as a Draft Modification Report. SL noted the expectation that the UNC would be progressing the equivalent UNC Modification following their Modification Panel on 17th December 2015. The Panel expressed the importance of aligning the consultation windows of the two Modifications, and therefore agreed that the DMR for iGT082 should be sent out on 17th December 2015, providing the UNC Modification Panel made a decision to similarly progress the UNC equivalent. The Panel agreed that the full consultation window should apply, meaning a close-out date of 13th January 2016. The Panel accepted that the FMR would be published on 14th January 2016, and considered as short notice business, to allow for the Modification to be progressed at the Panel on 20th January 2016 in line with the UNC equivalent.

Action 15-12-05: Code Administrator to send iGT082 out for consultation as a Draft Modification Report with a close out of 13th January 2016.

12. FINAL MODIFICATION REPORTS

None.

13. CODE GOVERNANCE REVIEW – PHASE 3

PR noted that Code Administrators from across the industry had been invited to participate in a workshop in early December 2015, to consider solutions to Ofgem proposals to further improve code governance practices, specifically with respect to self-governance guidance, the role of the Code Administrator as a critical friend, and key metric reporting through the Code Administration Code of Practice (CACoP). PR noted that the Code Administrators had taken actions to develop specific ideas and areas of innovation, which may form part of Ofgem final proposals expected in spring 2016. PR agreed to keep the Panel fully updated as the programme developed.

14. AUTHORITY UPDATES

LD noted that this Panel would be her last, as she would be moving to a new area within Ofgem. Rory Edwards would be returning to his role as Ofgem Representative to the iGT UNC in the New Year. The Panel thanked LD for her support during her time on the Panel.

15. ANY OTHER BUSINESS

There was no further business.

The next Modification Panel meeting will be convened at 11:00am on 20th January 2016