

## iGT UNC Modification Panel Meeting 17-09

Wednesday 20<sup>th</sup> September 2017

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee	Organisation	Representing	As
Steve Ladle (SL)	Gemserv	Code Administrator	Chairman
Andrew Margan (AM)*	British Gas	Pipeline Users	
Mark Jones (MJ)*	SSE Energy Supply	Pipeline Users	
Kirsty Dudley (KD)*	E.ON	Pipeline Users	
Ashely Foster (AF)*	Indigo Pipelines	Pipeline Operator	
Rob Johnson (RJ)*	ESPUG	Pipeline Operator	
Jenny Rawlinson (JR)*	BU-UK	Pipeline Operator	
Roberta Fernie (RF)*	Ofgem	Authority	
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. Apologies for absence were received from Victoria Parker (ESPUG) and Cher Harris (SSE). Rob Johnson (ESPUG) was nominated as the alternate for Victoria Parker and Ashley Foster (Indigo Pipelines) was nominated as the alternate for Cher Harris.

### 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 did not have any additional items to add.

### 3. Approval of the previous minutes

RB informed the Panel that one comment was received regarding the August Panel meeting minutes. This was around changing one reference to 'SPAA' to 'commercial contracts' during the discussions of iGT100. The minutes from the previous Modification Panel meeting (16<sup>th</sup> August 2017) were approved as a true and accurate record of the meeting.

### 4. Outstanding actions

17/08-01	CA to add iGT102 Workgroup to the September Workstream meeting for further development.	Completed. Closed.
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17/08-02	NB to amend modification proposal for iGT102 and submit this to the CA before the circulation of the Workstream final agenda on 29 <sup>th</sup> August 2017.	Completed. Closed.
17/08-03	Code Administrator to prepare the Draft Modification report for iGT095VV including both the PIA & Technical Solution appended and including the Ofgem send-back questions.	Completed. Closed
17/08-04	Code Administrator to send the Draft Modification Report for iGT095VV out for consultation with the closing date of 8 <sup>th</sup> September 2017.	Completed. Closed
17/08-05	Code Administrator to notify all parties that iGT100 has been decided by the Panel and will be scheduled for implementation in the November Code release.	Completed. Closed
17/08-06	Code Administrator to amend the iGT UNC website by archiving the pre-panel meetings section of the webpage.	Completed. Closed
17/08-07	Code Administrator to move the iGT UNC Panel to 9.30am on a trial basis to see if this helps Panel members attend both the Panel meeting and DSC Contract management meeting.	Completed. Closed

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

## 5. Short Notice Business

None

## 6. Panel decisions

None.

## 7. Update on Modification Workgroups

[iGT102 - Enduring solution for provisions that allow consecutive estimated invoicing in the event of System Failure by the CDSP](#)

The Chair updated the Panel on discussions at the September Workstream meeting. Neil Brinkley (BU-UK) presented the modification proposal to the Workgroup who discussed that in the event of a catastrophic and/or prolonged system failure from the CDSP this modification would ensure that iGTs would be able to invoke a contingency plan whereby invoices are estimated from the last paid invoice issued to a Shipper. The Workgroup discussed the length of time that consecutive billing would be allowed for, and agreed to bring this down from ten months to six months. The Workgroup also questioned why this situation was different from the current 18-month invoice query process and it was agreed that the modification would be amended to flesh this out, as well as considering the legal text. BU-UK resolved to take all comments received at the Workgroup back to make amendments to the modification ahead of the next Workstream meeting.

## **8. Withdrawn Modifications**

None.

## **9. Urgent Modification Proposal received**

None.

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

None.

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

None.

## **12. Workgroup Reports**

None.

## **13. Final Modification Reports**

[iGT095VV - Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries](#)

The Chair summarised the Consultation responses noting that five responses were received and of the five, four parties including Users and Operators offered qualified support to the Modification and one system operator offered support.

Panel members supported the principle of allowing PCWs access to domestic consumer data in order to facilitate competition in the industry. However, all Panel members expressed concerns around the delivery of the technical solution and DPA concerns on the conformity and accountability of the vehicle to facilitate this. One Panel member voiced concerns over the industry's ability to control the development of the technical solution through the DSC Change management committee (DSC ChMg), stating their view that Xoserve believes this permissions modification would give them the mandate to develop the solution without input from the DSC ChMg meeting.

The Chair noted that one party suggested that the legal text should also include a clause to require that the CDSP should monitor compliance with the service agreement and DPA –

j(ii) The CDSP shall, by 31 March each year, produce a report summarising activities undertaken to monitor compliance and identify any breaches to the confidentiality and service agreements.

The Chair noted that the same party also suggested that the solution section of the modification be updated - “ESPUG does not foresee any development costs, based on the CDSPs proposal to recover costs for this service via the DSC Third Party provisions between Xoserve and individual PCWs. We note that this information has not been included in the modification report, and suggest the solution section be updated to make this intention clear to stakeholders.”

The Panel discussed both the suggested amendment to the solution and the additional legal text;

### **Suggested amendment to the Solution**

The Panel understood the suggested addition to the solution, however, acknowledged that little can be done at this stage of the modification process to add development costs into this modification without sending the Modification back to Workgroup, for which they saw no overall justification.

### **Legal text addition**

The Panel acknowledged the suggested addition to the legal text, however, felt that this was outside of the scope of iGT095VV as a permissions modification and suggested that this should be discussed in the DSC ChMg meeting. The Panel was satisfied that the legal text presented in the modification accurately facilitated the solution.

### **Consideration of the Relevant Objectives**

The Panel members agreed that this Modification meets the criteria set out in Objective D for the reasons as set out in the Modification and in the consultation responses.

### **Determinations**

The vote was carried out with three Pipeline Users and three Pipeline Operators (Ashley Foster acted as alternate for Cher Harris and Rob Johnson acted as alternate for Victoria Parker). The Panel agreed that the Modification should be implemented by a unanimous vote. The Panel discussed which category this modification falls under according to the Code rules and their associated lead implementation times. The Panel decided that this modification would come under a documentation only modification with a minimum two-month implementation window after the date of direction or consent by the Authority. The Panel also discussed the possible implications of implementing a permissions modification into code without having the system to facilitate this, and referenced modifications which were held back pending the implementation of Project Nexus with linked implementation dates.

The Panel discussed the subject of possible implementation dates. The Panel suggested that the implementation of iGT095VV should be linked to the implementation, and delivery of the technical and contractual solutions provided by Xoserve. Without this link the Panel believes that parties could be put in breach should a Price Comparison Website request information about domestic consumers.

JR noted that a line should be added to the iGT Panel response letter highlighting the recommendation to linking implementation dates. The Chair agreed.

**Action 17/09-01: Code Administrator to send the Final Modification Report for iGT095VV to the Authority for decision, as well as the accompanying Panel response to the send back letter.**

[iGT101F – Amending iGT UNC legal text to reflect changes to the UNC made by UNC570.](#)

The Chair summarised the consultation responses received noting that one pipeline operator and one pipeline user responded. The Panel recognised the principal of this modification in bringing in the iGT UNC into line with the UNC after UNC570 has been passed for implementation.

Panel members agreed that this Modification meets the criteria set out in Objective F.

The vote was carried out with 3 Pipeline users and 3 Pipeline Operators. 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 UNC570. At the time of the iGT Panel decision, the UNC Panel had not agreed on a date for UNC570.

**Action 17/09-02: Code Administrator to notify all parties that iGT101F has been decided by the Panel and will be scheduled for implementation in line with UNC570.**

#### **14. Authority Update**

None.

**The next Modification Panel meeting will be convened on 18<sup>th</sup> October 2017.**

## Summary of Actions

Action Reference	Date	Action	Owner	Status
17/09-01	20 <sup>th</sup> September 2017	Code Administrator to send the Final Modification Report for iGT095VV to the Authority for decision, as well as the accompanying Panel response to the send back letter.	CA	New
17/09-02	20 <sup>th</sup> September 2017	Code Administrator to notify all parties that iGT101F has been decided by the Panel and will be scheduled for implementation in line with UNC570.	CA	New

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