

Modification		At what stage is this document in the process?
<h1>IGT109F:</h1> <h2>Amending the IGT UNC legal text to reflect changes to the UNC made by UNC632S</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 2px solid green; border-radius: 10px; padding: 5px; display: flex; align-items: center; justify-content: center;"> <span style="font-weight: bold; font-size: 1.2em; margin-right: 5px;">01</span> <span>Modification</span> </div> <div style="border: 2px solid blue; border-radius: 10px; padding: 5px; display: flex; align-items: center; justify-content: center;"> <span style="font-weight: bold; font-size: 1.2em; margin-right: 5px;">02</span> <span>Workgroup Report</span> </div> <div style="border: 2px solid purple; border-radius: 10px; padding: 5px; display: flex; align-items: center; justify-content: center;"> <span style="font-weight: bold; font-size: 1.2em; margin-right: 5px;">03</span> <span>Draft Modification Report</span> </div> <div style="border: 2px solid orange; border-radius: 10px; padding: 5px; display: flex; align-items: center; justify-content: center;"> <span style="font-weight: bold; font-size: 1.2em; margin-right: 5px;">04</span> <span>Final Modification Report</span> </div> </div>
<p><b>Purpose of Modification:</b></p> <p>This Modification aims to make changes to the IGT UNC in order to keep the Code aligned with the UNC following legal text changes made by UNC632S.</p>		
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> <li>subject to fast track self-governance</li> <li>proceed to Consultation</li> </ul> <p>This modification will be presented by the Proposer to the Panel on 20<sup>th</sup> June 2018. The Panel will consider the Proposer’s recommendation and determine the appropriate route.</p>	
	<p>High Impact: N/A</p>	
	<p>Medium Impact: N/A</p>	
	<p>Low Impact: Shipper Users</p>	

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<p><b>The Proposer recommends the following timetable:</b></p> <table border="1"> <tbody> <tr> <td>Consultation Close-out for representations</td> <td>24<sup>th</sup> May 2018</td> </tr> <tr> <td>Modification Panel decision</td> <td>20<sup>th</sup> June 2018</td> </tr> </tbody> </table>			Consultation Close-out for representations	24 <sup>th</sup> May 2018	Modification Panel decision	20 <sup>th</sup> June 2018
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<p>Contact: <b>Code Administrator</b></p> <p> <b>IGTUNC@Gemserv.com</b></p> <p> <b>02070901044</b></p> <p>Proposer: <b>Kate Mulvany (Centrica)</b></p> <p> <b>Kate.Mulvany@centrica.com</b></p> <p> <b>07789 572 420</b></p>						

## 1 Summary

### What

Part D of the IGT UNC requires amendment to reflect changes to the UNC legal text, introduced through the implementation of UNC632S. Without these changes the IGT UNC will not reference all of the relevant clauses within Section M of the UNC (namely M2.1.14).

### Why

UNC 632S introduced two new definitions in the UNC and amended two Clauses in Section M (M 2.1.13 and M 2.1.14). Whilst the IGT UNC references section M 2.1.13 it does not do the same for the other clause. It is understood that this is due to issues with recognising the correct legal text in the UNC, when the IGT UNC was finally updated to reflect the post-Nexus arrangements, via a number of comparison exercises carried out to update the original IGT039 Legal Text with changes that had been made in both the UNC and the IGT UNC since the IGT039 text had been approved. To fully deliver the intent of UNC632S in the IGT UNC a further update of the IGT UNC legal text is required to include reference to UNC M 2.1.14.

### How

This Modification seeks to incorporate changes within the IGT UNC, to ensure that the intent of UNC632S is fully referenced in the IGT UNC. Therefore, the IGT UNC requires additional legal text, which makes reference to UNC Section M 2.1.14.

## 2 Governance

### Justification for Fast Track Self-Governance Procedures

The Proposer recommends that this modification should be subject to fast-track self-governance, as the Modification if implemented, would not have a material effect on the relevant Parties to the IGT UNC. Shippers, who will be subject to this change will already have in place processes and procedures to support the changes that were introduced under UNC 632S. In addition of the 6 responses provided by Shippers to UNC632S, 4 were fully in support of the change and 2 provided qualified support.

At the IGT Modification Workstream meeting on 3rd April the issue of inconsistency between the two Codes was discussed and there was general consensus that a Fast Track Modification to the IGT UNC should be raised to address the issue.

### Requested Next Steps

This modification should:

- be subject to fast track self-governance
- proceed to Consultation

It is proposed that this proposal is considered as a fast track self-governance Modification. As it has already been the subject of debate and consultation under the UNC and has been implemented by the UNC Modification Panel, we believe that there is no development needed and that the proposal is suitable for immediate consultation following Panel's consideration of it (subject to appropriate legal text being provided).

### 3 Why Change?

UNC 632S introduced two new definitions in the UNC and amended two Clauses in Section M (M 2.1.13 and M 2.1.14). Whilst the IGT UNC references section M 2.1.13 it does not do the same for the other clause. It is understood that this is due to issues with recognising the correct legal text in the UNC, when the IGT UNC was finally updated to reflect the post-Nexus arrangements, via a number of comparison exercises carried out to update the original IGT039 Legal Text with changes that had been made in both the UNC and the IGT UNC since the IGT039 text had been approved. To fully deliver the intent of UNC632S in the IGT UNC a further update of the IGT UNC legal text is required to include reference to UNC M 2.1.14.

At the IGT Modification Workstream meeting on 3rd April the workgroup assessed a paper which highlighted the misalignment in both Codes. Clause D2.10 was added by IGT47 (Inclusion of data items relevant to smart metering into existing industry systems) which was developed post the initial iGT039 text extract. The text would have been added to iGT039 at a later stage when additional mods implemented during the iGT039 development phase were being considered. At that stage, the IGT047 text was removed and replaced by a point across to the equivalent UNC text (M2.1.13). However, as the equivalent paragraph to M2.1.14 hadn't been introduced by iGT47, no point across to the UNC was introduced, as it appeared that M2.1.14 did not exist when IGT47 was developed. Further investigation revealed that the cross reference was not updated post IGT47 because at the time Advanced meters were not seen as relevant to IGT networks.

### 4 Code Specific Matters

#### Technical Skillsets

An understanding of the IGT UNC and the UNC legal text will be required to successfully implement this proposal.

#### Reference Documents

In considering the legal text for this proposal, it would be prudent to review UNC632S<sup>1</sup>

### 5 Solution

This Modification seeks to incorporate changes within the IGT UNC, to ensure that the intent of UNC632S is fully referenced in the IGT UNC. Therefore, the IGT UNC requires additional legal text, which makes reference to UNC Section M 2.1.14.

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<sup>1</sup> <https://www.gasgovernance.co.uk/sites/default/files/ggf/book/2018-03/Final%20Modification%20Report%200632S%20v2.0.pdf>

## 6 Impacts & Other Considerations

**Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?**

No

### Consumer Impacts

None identified

### Cross Code Impacts

As outlined above this proposal is seeking to align the IGT UNC and the UNC in relation to Section M.

## 7 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	None
(B) Co-ordinated, efficient and economic operation of <ul style="list-style-type: none"> <li>(i) the combined pipe-line system; and/or</li> <li>(ii) the pipe-line system of one or more other relevant gas transporters</li> </ul>	None
(C) Efficient discharge of the licensee's obligations	None
(D) Securing of effective competition: <ul style="list-style-type: none"> <li>(i) between relevant shippers;</li> <li>(ii) between relevant suppliers; and/or</li> <li>(iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers</li> </ul>	None
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	Positive
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

This proposal will promote Relevant Objective (F) of the IGT UNC, as it will ensure cross code alignment, between the IGT UNC and the UNC.

## 8 Implementation

As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement subject to there being no Appeal raised. Implementation as soon as possible is advised to mitigate the period of time the Codes will not align.

## 9 Legal Text

### Part D

2.10 Where a Smart Meter is installed at a Supply Meter Point **or there are changes to the provision or existence of an Advanced Meter at a Supply Meter Point**, the provisions of paragraphs 2.1.13 **and/or 2.1.14** of Section M of the UNC shall apply.

### Part M

**“Advanced Meter”**: shall have the same construction as that set out in Standard Condition 12.22 of the Gas Suppliers License published by the Authority;

## 10 Recommendations

### Proposer’s Recommendation to Panel

Panel is asked to:

- Agree that Fast Track governance procedures should apply
- Issue this modification directly to Consultation