

## **IGT UNC Modification Workstream Meeting 18-06**

**Tuesday 5<sup>th</sup> June 2018**

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

<b>Attendee</b>		<b>Organisation</b>	
Steve Ladle	(SL)	Gemserv	Chairman
Kate Mulvany	(KM)	Centrica	
Mark Jones	(MJ)	SSE	
Kirsty Dudley	(KD)	E.ON	
Rob Johnson*	(RJ)	ES Pipelines	
Nicky Rozier	(NR)	BU-UK	
David Bowles*	(DB)	Fulcum	
Roberta Fernie*	(RF)	Ofgem	Item 8 only
Paul Orsler	(PO)	Xoserve	
Ranjit Patel	(RP)	Xoserve	
Paul Rocke	(PR)	Gemserv	
Joe Steele	(JS)	Gemserv	Observer
Rachel Bird	(RB)	Gemserv	Secretariat

### **1. Welcome and apologies for absence**

The Chair welcomed attendees to the meeting of the IGT UNC Modification Workstream. Apologies were received by John Cooper (BU-UK) and Radhika Kalra (E.ON).

### **2. Confirmation of Agenda**

The Chair confirmed the items for discussion as outlined in the final agenda. The Workgroup had no further business to add to the agenda.

### **3. Approval of the Previous Minutes**

Attendees reviewed the minutes from the Modification Workstream meeting held on 1<sup>st</sup> May 2018 (18-05). RB noted that one comment had been received prior to the meeting to amend the spelling of a Radhika Kalra's name and to add a correct reference into the RG003 discussions. The Workgroup did not have any further comments on the previous minutes. The minutes were agreed and approved as a true and accurate record of the meeting.

### **4. Outstanding Actions**

Please refer to the table in Appendix 1 at the end of the minutes for updates on actions arising.

**18/02-01**

RB noted that at the last CACoP meeting held on 22<sup>nd</sup> May 2018 both SPAA & BSC Code Administrators offered to send over best practice guidance for managing contact lists. Both at the meeting commented that unless a contacts list is mandated parties will not keep contacts up to date.

KD queried which contacts are needed from Shippers so IGTs have a contact. RJ noted that one example would be when charging statements are released it would be useful to have direct contacts to send those across, ensuring that all parties have seen the document. KD suggested that a way to overcome that would be to host the charging statement on either the AIGT or IGT UNC websites. RJ noted the suggestion and resolved to combine a list of which contacts would be useful and to bring this back to a workgroup at a later stage.

**Action MWS18/06-01: RJ to compile a list of required Shipper contacts which would be useful to include in the SOS escalation spreadsheet and return to the Workgroup.**

## 5. Cross-Code Modification Implications

The Chair introduced a document prepared by the Code Administrator which is to be used to track UNC modifications which could have an impact on the IGT UNC.

The Workgroup reviewed the document and discussed the possible implications to the IGT UNC, the discussion is detailed below;

Mod Ref	Description	Workgroup determination
659	Improvements to the Composite Weather Variable	The Workgroup noted that this modification has been separated out of UNC644. There could be some areas of crossover with the IGT UNC. The Workgroup resolved to monitor this until the legal text has been released.
658	CDSP to identify and develop improvements to LDZ settlement processes	The Workgroup resolved that as this is a modification looking at Settlement there should be no impact on the IGT UNC, however, resolved to monitor this until the legal text has been released.
657	Adding AQ reporting to the PARR Schedule reporting suite	The Workgroup resolved to monitor this modification as the legal text has not yet been released and this may have an effect on the IGT UNC.
656	Changes to Modification Panel arrangements	The Workgroup resolved to monitor this modification as the legal text has not yet been released and this may have an effect on the RG004 discussions. <b>See discussion below.</b>
655	S Requiring a Meter Reading following a change of Local Distribution Zone or Exit Zone.	The Workgroup resolved to monitor this modification as the legal text has not yet been released and this may have an effect on the IGT UNC. However, a first analysis indicated that the IGT UNC could point across at a sufficiently high level.
654	Mandating the provision of NDM sample data	E.ON have raised IGT110 and is to be discussed in agenda item 6.
652	Obligation to submit reads and	The Workgroup resolved to monitor this modification as

		data for winter consumption calculation (meters in EUC bands 3 - 8)	the legal text has not yet been released and this may have an effect on the IGT UNC.
651		Replacement of the Retrospective Data Update provisions	The Workgroup resolved to monitor this modification as the legal text has not yet been released and this may have an effect on the IGT UNC.
649		Update to UNC to formalise the Data Enquiry Service Permissions Matrix	No implications on the IGT UNC in current legal text, however, the IGT UNC does not directly reference 'Data Enquiry Service' and it has been agreed to cover this off in the RG003 review group work.
647		Opening Class 1 reads to Competition	This modification proposes to Open Class 1 reads to competition by introducing common arrangements for Class 1 and 2 by removing the DNO obligation to provide a Daily Read service to Shippers for non-telemetered Class 1 Supply Meter Points. There will be IGT UNC implications if the obligation is removed from the IGTAD and placed on IGTs who do not have those commercial arrangements currently and Workgroup resolved to monitor this modification.
632	S	Shipper asset details reconciliation	IGT109F has now closed its consultation period and will be sent to the June Panel meeting for a decision on its implementation.
630	R	Review of the consequential changes required in UNC as a result of the Ofgem Switching Programme	The Workgroup noted that this may affect the IGT UNC and noted that this should continue to be monitored. WG resolved to wait for more development in this review group before forming an IGT equivalent. Xoserve still developing and impact assessment in this review group.
623		Governance Arrangements for Alternatives to Self-Governance Modification Proposals	This modification has been passed for implementation and will be included in a release on 20 <sup>th</sup> April 2018. The IGT UNC will require an equivalent modification.
619		Application of proportionate ratchet charges to daily read sites	619A has been recommended by UNC Panel for implementation. Currently awaiting Authority decision. This modification recognises new product classes and the Workgroup has resolved to monitor this modification.

KD noted that UNC656 has developed and it is proposed that the modification will be split into four workgroups to discuss various aspects of the suggested solution. The additional areas being considered are changing Panel elections to every two years (held in October) and adopting the same principle as the IGT UNC of the 'three strike rules' whereby any Panel member or their Alternate who do not attend three consecutive Panel meetings without notification are removed as a Panel member.

KD suggested that any outputs which may come from these workgroups could be included in a mirror modification with UNC623. The Workgroup acknowledged the update.

**Action MWS18/06-02: CA to update the Cross-Code modification implications tracker to close all modifications which do not implicate the IGT UNC.**

## 6. Modification Workgroup

### [IGT110S – Mandating the provision of NDM sample data](#)

KD introduced the modification noting that this had been passed to a Workgroup by the Panel, however, noted that the mirror UNC modification (UNC654) had developed further and therefore IGT110S is currently being updated. The modifications will now include requirements for a Performance Assurance Committee (PAC) report to be produced to show whether meters are IGT/GT/mixed supply points. Therefore, the business rules are being amended, and references to Performance Assurance Reporting (PAR) are being added to reflect the additional reports.

The updated modification will be brought to the next workgroup for discussion.

## 7. Review Group

### [RG003 - Review of Data Permissions](#)

The Chair noted that at the last meeting the Workgroup discussed Xoserve's analysis of both the UNC and the IGT UNC and highlighted areas where gaps appeared in the legal texts. Following the meeting the IGTs discussed their thoughts on the spreadsheet and whether they believed a modification was needed to align both Codes.

The Workgroup [reviewed the document](#) and discussed each data permission detailed below:

#### Price Comparison website (PCW) and Third-Party Intermediary (TPI) access

- Concluded that there were no further actions needed to cover this section.

#### Performance Assurance

- Concluded that there were no further actions needed to cover this section.

#### Smart Meter Data

- Housekeeping modification needed to amend references to 'Pipeline Operator' to 'CDSP' to align to the UNC.

#### Meter Asset Providers

- Concluded that there were no further actions needed to cover this section. The Workgroup agreed that this was covered by IGT105.

#### Domestic Consumer (or person acting on behalf of Domestic Consumer)

- Housekeeping modification needed to mirror the UNC equivalent legal text.

## Data Enquiry

- The Workgroup agreed that no further action was required as this obligation is included in the Schedule 23 of SPAA and that this is mandatory for all IGTs.

## Historic Supply Meter Point and Read Information

- Housekeeping modification needed to mirror the UNC equivalent legal text.

## Theft of Gas (TOG) reports

- The Workgroup agreed that no further action was required as this obligation is included in the Schedule 33 of SPAA and that this is mandatory for all IGTs.

## Gas safety reports

- Workgroup concluded that there is no obligation on the IGTs to produce these and therefore no further action is required.

## Energy Theft Tip Off Service (ETTOS)

- It was noted that IGTs are now mandated to share data with ETTOS following SPAA CP17/403 (February 2018) in schedule 37.
- The Workgroup agreed that no further action was required as this obligation is included in the Schedule 37 of SPAA and that this is mandatory for all IGTs.

## Theft Risk Assessment Service (TRAS)

- Housekeeping modification needed to mirror the UNC equivalent legal text.

## MAM Access to Data

- Housekeeping modification needed to mirror the UNC equivalent legal text. The Workgroup noted that the UNC was comprehensive in detailing the data items to be shared and it may be worth pointing across to the UNC to capture this detail.

The Workgroup concluded the workgroup report and noted that this will be sent to the June Panel.

**Action MWS18/06-03: CA to add the RG003 Workgroup report to the June Panel agenda.**

## **8. RG004**

### [RG004 - Review of IGT Governance and administration arrangements](#)

PR introduced the problem statement paper to the Workgroup, noting that the paper sets out three perceived problems, measures these against the suggested solutions posed in the original request

and includes two appendices analysing Workgroup attendance trends and modifications raised since 2015.

PR noted that the problems outlined in the paper are:

- Much of the IGT UNC work is administrative in terms of maintaining consistency with the UNC;
- Engagement with the Code has decreased; and
- Shipper position has not been filled – Quoracy issues.

PR worked through the suggested solutions and assessed whether these would help to fully solve the perceived.

#### To amalgamate all common areas of the IGT UNC and the UNC problems

SL noted that this would still require specific IGT expertise to be maintained by Shippers, both within businesses and in attendance at industry Workgroups.

#### To create a common UNC and IGT UNC modification process

RF queried whether this would be one modification report spanning both Codes or whether the two would be separate and move forward concurrently. SL noted that a problem would be identified, a specific type of modification raised which both Panels could have voting rights on, and would have two different legal texts.

The Workgroup acknowledged that this may be no less labour intensive than the status quo, and noted that commercial interest may be threatened when one party delegates to another. RF requested that the option be fleshed out to include more details of the suggested process.

**Action MWS18/06-04: CA to amend the problem statement paper to include more detailed explanation of the dual-modification process.**

#### To amend the IGT UNC to reference the UNC at a much higher 'section type' level

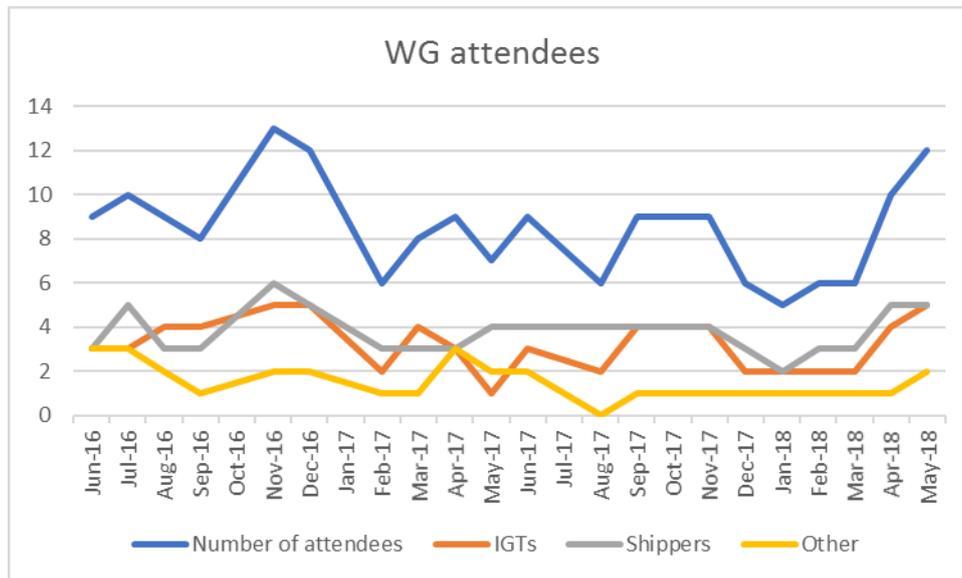
RJ noted that this option may not be achievable as IGT039 stated why reference at a higher level is high risk for IGTs adopting clauses they do not need/are not relevant to them.

#### To put the IGT UNC (and its Ancillary documents) in their entirety into the UNC as a separate section

PR noted that this option is similar to option one, however this would still need the expertise to monitor change against the IGT text.

RB introduced the analysis of data to the Workgroup, noting that show a steady trend of attendees for Workgroup meetings up until the first quarter of 2018 was found. Peaks of activity can be identified around key milestones for IGT092A with joint workgroup being held in January 2017 (finalising of the Non-effective days, project Nexus, Workgroup reports to go to Panel), and IGT095VV in July 2017

(finalising of the Price Comparison Website workgroup report). NR had suggested these be removed to better accurately reflect attendance.



MJ noted that perhaps there had not been enough time post nexus and prior RG004 to accurately monitor attendance levels, as in the latter half of 2017 there had been a slight drop. However, the Workgroup acknowledged that there had not been a significant drop in either IGT attendance or Shipper attendance. MJ added that some Shippers have also brought multiple attendees to meetings, and therefore the analysis may not be a completely clear picture.

RB went onto present the modification data. Through analysing the modifications that were raised in the period January 2015 to date, the following categories were used to distinguish the trigger for change:

- IGT UNC specific change;
- Single Service provision/ Central Data Service Provider;
- UNC/Code alignment; and
- Other (Ofgem changes/Significant Code review changes).

RB noted that the breakdown of the results is:

- IGT UNC specific - 21
- SSP/CDSP changes - 8
- UNC/Code alignment changes - 9
- Ofgem/Significant Code review changes - 3
- Total: 41

NR noted that further analysis of this data, and using the yearly totals of modifications raised it shows that:

2015 – 13 raised – 10 IGT specific

2016 – 11 raised – 6 IGT specific

2017 – 12 raised – 6 IGT specific

2018 (until June) – 6 raised – 1 IGT specific

The workgroup did acknowledge that in 2018 nearly all work has been SSP or alignment modifications, however noted that to date there has been a steady amount of modifications raised and a steady number of IGT specific up until this year.

KM noted that in considering a possible solution there needs to be a mechanism for IGT change. PR added that there may be things the IGT UNC can do to address the change process, noting that allowing Code Administrators to raise changes on behalf of industry could reduce parties resource in monitoring cross-code change, KD added that these changes would have to be non-material only.

The Workgroup noted that the paper was extremely helpful in outlining the problem and adding quantitative data.

The Workgroup resolved that now UNC656 has been raised and governance is being discussed in the UNC, now should be the time to create a Joint Workgroup. KD noted that at the UNC Panel meeting an issues register was presented and that the IGT governance could be added to this to form a Joint working group. KD resolved to speak with the Joint Office to have this added.

The Chair suggested the next steps on this review group, noting sending out a Request For Information (RFI) to the industry would seek wider opinions on the benefits/costs of the suggested solution. The Workgroup agreed that an RFI would be the best course of action and resolved that the questions should be brought to the next Workgroup for discussion.

**Action MWS18/06-05: CA to prepare a draft RFI for RG004 and bring these questions back to the July Workgroup.**

## **9. IGT UNC Known Issues register**

The Workgroup reviewed the current items recorded on the known issues register

The Workgroup resolved to keep all items open and carried forward the related actions.

## **10. AOB**

MJ queried how many IGTs there now are and what the status of new entrants is. RB noted that two IGTs had been granted licences in the last 6 months. Harlaxton gas networks have signed the Joint Governance Arrangements Agreement (JGAA), have provided their Independent Network Code (INC) which is hosted on the IGT website, and have been allocated 50,000 MPRNs. RB noted that the other

IGT is Murphy Gas Networks which have not yet signed the JGAA, or provided an INC for the website and have therefore not yet been allocated an MPRN range.

The Chair noted that the Code Administrator has now received the collated AQ NExA table for 2018 and noted this will come to the July workgroup for discussion. RB noted that during this year's exercise some of the less experienced IGTs had struggled with collecting their data and therefore the current ancillary document may need to be amended to make the process clearer.

**Action MWS18/06-06: NR to consult the AIGT with regards to providing more clarification on the AQ NExA review process for newer entrant IGTs.**

**The next IGT UNC Modification Workstream Meeting is on 3<sup>rd</sup> July 2018**

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## Appendix 1

<b>MWS17/11-05</b>	<b>7<sup>th</sup> November 2017</b>	<b>NR to draft a modification proposal to change the CSEP NExA Table.</b>	<b>NR</b>	<b>Carried Forward. Draft modification report will be brought to the July workstream meeting.</b>
MWS18/02-01	6 <sup>th</sup> February 2018	CA to discuss the various approaches to contact lists across all Codes at the next CACoP meeting.	CA	Closed.
<b>MWS18/03-06</b>	<b>6<sup>th</sup> March 2018</b>	<b>CA to send out an email to all IGTs to ascertain whether they are willing to change their processes to incorporate planned sites as per the understood intention of the code and an expectation of when IGTs can deliver this.</b>	<b>CA</b>	<b>Carried Forward. CA to follow up on this with a deadline date of 1<sup>st</sup> September 2018 to include PL in portfolio.</b>
MWS18/03-07	6 <sup>th</sup> March 2018	RJ to follow up with Katy Binch that the IGT RGMA Guidance document is progressing with all SPAA changes and whether this needs to be sent back to the Workgroup for comment.	RJ	Closed. Document will be ready for 29 <sup>th</sup> June deadline.
MWS18/05-01	1 <sup>st</sup> May 2018	CA to update the Cross-Code modification implications tracker to close all modifications which do not implicate the IGT UNC.	CA	Closed.
MWS18/05-02	1 <sup>st</sup> May 2018	CA to create a draft Workgroup report for RG003 and to bring this back to the next IGT Workstream meeting in June 2018.	CA	Closed.
MWS18/05-03	1 <sup>st</sup> May 2018	IGTs to meet and discuss the findings of RG003 and to report back to the Code Administrator no later than 22 <sup>nd</sup> May 2018.	IGTs	Closed.
MWS18/05-04	1 <sup>st</sup> May 2018	CA to prepare a paper for the next meeting which analyses the modifications raised since January 2015 to ascertain how many of these have been IGT business and how many are 'Housekeeping' changes.	CA	Closed.
MWS18/05-05	1 <sup>st</sup> May 2018	CA to prepare a paper for the next meeting which outlines problem statements at the root of RG004.	CA	Closed.
<b>MWS18/06-01</b>	<b>5<sup>th</sup> June 2018</b>	<b>RJ to compile a list of required Shipper contacts which would be useful to include in the SOS escalation spreadsheet and return to the Workgroup.</b>	<b>RJ</b>	<b>New</b>

MWS18/06-02	5 <sup>th</sup> June 2018	CA to update the Cross-Code modification implications tracker to close all modifications which do not implicate the IGT UNC.	CA	New
MWS18/06-03	5 <sup>th</sup> June 2018	CA to add the RG003 Workgroup report to the June Panel agenda.	CA	New
MWS18/06-04	5 <sup>th</sup> June 2018	CA to amend the problem statement paper to include more detailed explanation of the dual-modification process.	CA	New
MWS18/06-05	5 <sup>th</sup> June 2018	CA to prepare a draft RFI for RG004 and bring these questions back to the July Workgroup.	CA	New
MWS18/06-06	5 <sup>th</sup> June 2018	NR to consult the AIGT with regards to providing more clarification on the AQ NExA review process for newer entrant IGTs.	NR	New

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