

Appendix C (Modification Analysis)

Analysis of modifications raised pre/post Nexus to ascertain IGT specific issues vs Code alignment

Below is an analysis of the modifications raised in the period before and after Project Nexus implementation. The analysis looks at whether the modification raised was an IGT specific issue, whether this was a result of Single service provision (CDSP specific), or whether this was raised to keep both Codes aligned following the large-scale cross-over in June 2017.

Please note that the below data was collected and correlated by the Code Administrator, presented to the RG004 workgroup and ratified by this group. This data was however questioned by one member of the workgroup, as the categorisation of these modifications can be subjective. It was noted throughout discussions that the perception of whether some modifications are IGT specific or linked to CDSP change was questioned. Due to this RFI respondents are asked to review the data and conclusion with this in mind.

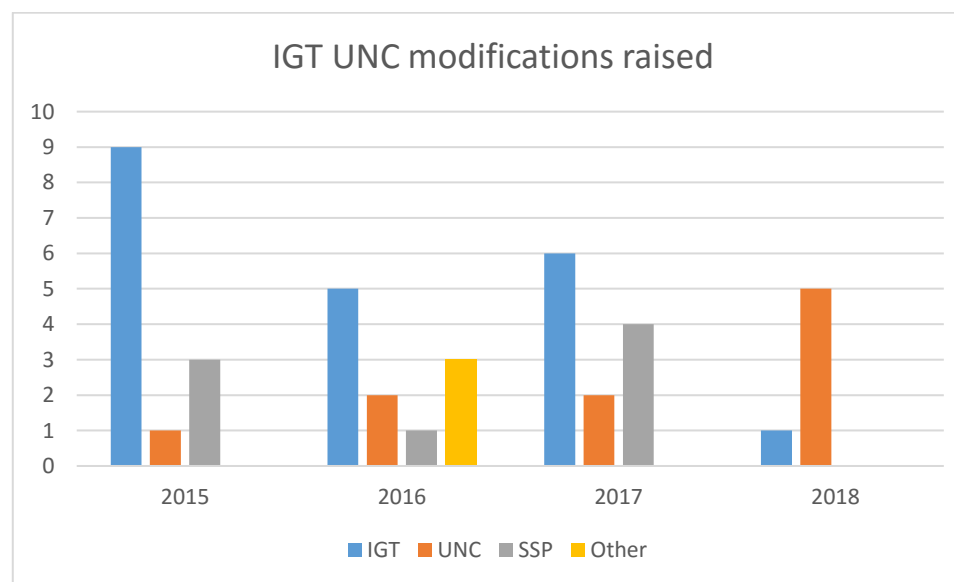
| Date | Mod # | Objective | Specific to IGTs/SSP/UNC/Other | Type of Change | Impact |
|------------|---------|--|--------------------------------|-----------------------------|----------------------|
| Jan - 2015 | IGT070S | Removal of Ancillary Documents following the implementation of SSP | IGT UNC | IGT AD change | None outside of Code |
| Jan - 2015 | IGT071S | Updating the IGT AQ Review Procedures Ancillary Document | IGT UNC | IGT AD change | None outside of Code |
| Jan - 2015 | IGT072S | Non-Effective Days for Cutover to SSP | SSP | Consecutive change with UNC | Deferred |

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|------------|---------|---|---------|-----------------------------|----------------------|
| Jan - 2015 | IGT073S | Consequential Changes to the 'Pipeline Operator Standards of Service Query Management' Ancillary Document | IGT UNC | IGT AD change | None outside of Code |
| Feb - 2015 | IGT074S | Amendment of Password Protection Ancillary document | IGT UNC | IGT AD change | None outside of Code |
| Feb - 2015 | IGT075S | Identification of Supply Meter Point pressure tier | UNC | Consecutive change | Rejected |
| Feb - 2015 | IGT076S | Amendment of RPC format in line with Single Service Provision | IGT UNC | IGT Invoicing | None outside of Code |
| Feb - 2015 | IGT077S | Amendment of Portfolio Extract format in line with Single Service Provision | IGT UNC | IGT Invoicing | None outside of Code |
| Apr - 2015 | IGT078S | Ancillary Document for the New Connections process | IGT UNC | New IGT Connections | None outside of Code |
| May – 2015 | IGT079S | Adding Non-domestic New Connections Framework Ancillary Document | IGT UNC | New IGT Connections | None outside of Code |
| Jun – 2015 | IGT080S | Mandating IGT use of Xoserve Portfolio Data for Shipper Transportation Billing | IGT UNC | IGT Invoicing | None outside of Code |
| Aug – 2015 | IGT081F | Correcting Incorrect Definition for Project Nexus Go Live Date | SSP | SSP Housekeeping Change | None outside of Code |
| Oct - 2015 | IGT082 | IGT Single Service Provision, non-effective days for cutover in 2016 | SSP | Consecutive change with UNC | Rejected |
| Apr - 2016 | IGT083S | Correction to PSR Process to Support SSP Arrangements | IGT UNC | New IGT Connections | None outside of Code |
| May – 2016 | IGT084S | Clarification on IGT RPC Invoice Template | IGT UNC | IGT Invoicing | None outside of Code |

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|------------|----------|---|---------|---------------------------|----------------------|
| Jun – 2016 | IGT085F | SSP Housekeeping Changes | IGT UNC | SSP Housekeeping Change | None outside of Code |
| Jul – 2016 | IGT086S | Central Data Service Provider – Implementing IGT UNC changes to support FGO | UNC | Consecutive change - FGO | Align Codes |
| Aug – 2016 | IGT087S | Revision to the Modification Rules in Response to CGR3 – Significant Code Review Modifications | Other | SCR | Ofgem Directive |
| Aug – 2016 | IGT088S | Determining Implementation of Self Governance Modifications | Other | SCR | Ofgem Directive |
| Aug – 2016 | IGT089S | Revision to the Modification Rules in Response to CGR3 – Self Governance | Other | SCR | Ofgem Directive |
| Oct – 2016 | IGT090F | Changes to the IGT039 legal text following a review of UNC legal text | UNC | SSP Housekeeping Change | Align Codes |
| Nov – 2016 | IGT091S | Amending Rules for Appointing Pipeline User Representatives | IGT UNC | IGT UNC Housekeeping | None outside of Code |
| Dec - 2016 | IGT092A | Implementation of Non-Effective days for Project nexus Implementation, maintaining a minimum of two Supply Point System Business Days (Project Nexus transitional modification) | SSP | Consecutive change - PNID | SSP |
| Dec – 2016 | IGT093S | Changes to the CSEP NExA Tables Ancillary document to correct the effective dates on 2 of the tables | IGT UNC | IGT AD change | None outside of Code |
| Jan – 2017 | IGT094F | Amendments to file format types for IGT078 and IGT079 flows | IGT UNC | New IGT Connections | None outside of Code |
| Feb – 2017 | IGT095VV | Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries | IGT UNC | Consecutive change - PCW | CMA order |

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|------------|---------|---|---------|-----------------------------|----------------------|
| Mar – 2017 | IGT096F | Correction to the IGT083 legal text now IGT078/79 are complete | IGT UNC | IGT UNC Housekeeping | None outside of Code |
| Mar – 2017 | IGT097U | Provision for allowing consecutive estimated invoicing in the event of System Failure by the CDSP | IGT UNC | IGT Invoicing | None outside of Code |
| Apr - 2017 | IGT098F | Changes to the IGT UNC Code due to changes to the UNC Code | UNC | UNC610S | Align Codes |
| May – 2017 | IGT099S | Transitional AQ arrangements for IGTs as a result of a delay in Nexus Implementation | SSP | UNC610S | Align Codes |
| Jun – 2017 | IGT100S | Reinstating Asset Query Codes | IGT UNC | IGT AD change | None outside of Code |
| Aug – 2017 | IGT101S | Amending IGT UNC legal text to reflect changes to the UNC made by UNC570 | UNC | UNC570 | Align Codes |
| Aug – 2017 | IGT102 | Enduring solution for provisions that allow consecutive estimated invoicing in the event of System Failure by the CDSP | IGT UNC | IGT Invoicing | None outside of Code |
| Feb – 2018 | IGT103S | Inclusion of reference within IGT UNC to UNC TPD Section G paragraph 2.12 – 2.14 inclusive – Meter Point Portfolio Reconciliation | UNC | Consecutive change with UNC | Align Codes |
| Nov – 2017 | IGT104S | Permissions modification to allow the CDSP to release IGT supply point information under UNC MOD0520A | SSP | Allow CDSP to access data | Align Codes |
| Dec – 2017 | IGT105S | Creating permissions for the CDSP to release data to Meter Asset Providers | SSP | Allow CDSP to access data | Align Codes |
| Dec – 2017 | IGT106S | Provision of access to Domestic Consumer data for Suppliers | SSP | Allow CDSP to access data | Align Codes |

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|------------|---------|---|---------|-----------------------------|-------------|
| Feb – 2018 | IGT107F | Correcting the consumption adjustment reads within IGT UNC | UNC | UNC634 | Align Codes |
| Mar – 2018 | IGT108F | Updating references for UNC434 | UNC | UC434 | Align Codes |
| May – 2018 | IGT109F | Amending the IGT UNC legal text to reflect changes to the UNC made by UNC632S | UNC | UNC632S | Align Codes |
| May - 2018 | IGT110S | Mandating the provision of NDM sample data | IGT UNC | Consecutive change with UNC | Align Codes |



Summarising the analysis

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 (generally some form of change to the IGT/Shipper commercial relationship and required regardless of any Code harmonisation);
- ♦ Single Service provision/ Central Data Service Provider (raised in order to deliver SSP and recognising the changed role for the CDSP under Nexus);
- ♦ UNC/Code alignment (generally raised because there has been a change raised in the UNC that has required IGT UNC legal text changes to maintain the alignment between the 2 Codes); and
- ♦ Other (Ofgem changes/Significant Code review changes).

The rationale behind this categorisation is to distinguish, where those modifications which weren't IGT UNC specific/driven, whether they were due to the introduction of SSP or housekeeping changes to keep the IGT UNC aligned to the UNC. It is hoped that investigating this in more detail will either quantify or dispel the perception that most IGT modification work is simple housekeeping.

Using the table above a breakdown of the results is below:

- ♦ IGT UNC specific - 21
- ♦ SSP/CDSP changes - 8
- ♦ UNC/Code alignment changes - 10
- ♦ Ofgem/Significant Code review changes - 3
- ♦ Total: 42

The table data shows an even split in the past 2.5 years of IGT specific modifications and 'other' modifications, as listed above to 21/21 modifications.

Looking at the frequency of modifications raised throughout the years we can see a steady trend of modifications raised consistently across all four years, with 2018 on course to meet the same level as previous years, additionally included below is the breakdown of IGT specific modifications raised throughout the past four years:

- ♦ 2015 – 13 raised – 9 IGT specific
- ♦ 2016 – 11 raised – 5 IGT specific
- ♦ 2017 – 12 raised – 6 IGT specific
- ♦ 2018 (to date) – 6 raised – 1 IGT specific

A trend has emerged since February 2018 whereby only one modification raised has been for IGT UNC only purposes, and the others either being raised to align the Codes or for granting permissions to the CDSP to access data. Views would be welcomed on whether parties anticipate that this trend will continue or whether, once other major initiatives have settled in, industry focus will again return to specific improvements required in the IGT/Shipper commercial environment.