

## **IGT UNC Modification Workstream Meeting 18-09**

**Tuesday 4<sup>th</sup> September 2018**

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

<b>Attendee</b>		<b>Organisation</b>	
Steve Ladle	(SL)	Gemserv	Chairman
Chris Barker	(CB)	BUUK	
John Cooper	(JC)	BUUK	
Mark Jones	(CT)	SSE	
Kate Mulvany	(KM)	Centrica	
Kirsty Dudley	(KD)	E.ON	
Radhika Kalra	(RH)	E.ON	
John Welch	(JW)	Npower	
Paul Orsler	(PO)	Xoserve	
Dave Addison	(DA)	Xoserve	Item 1- 5 only
Bob Fletcher*	(BF)	Joint Office	Item 1- 5 only
Steve Mulinganie*	(SM)	Gazprom	Item 1- 5 only
Cher Harris*	(CH)	Indigo Pipelines	
Rob Johnson*	(RJ)	ES Pipelines	
David Bowles*	(DB)	Fulcrum	
Lesley Bowen*	(LB)	EDF Energy	
Roberta Fernie*	(RF)	Ofgem	Item 7 only
Rachel Clarke	(RC)	Gemserv	Secretariat

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

The Chair welcomed attendees to the meeting of the IGT UNC Modification Workstream. The Chair welcomed members of the Joint Office and UNC representatives to the meeting and noted that agenda item 5 would be held as a joint workgroup to finalise the Workgroup reports for IGT115 and UNC649S.

### **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 7<sup>th</sup> August 2018 (18-08). RC noted that no comments were received on the minutes prior to the meeting. The Workgroup had no additions to make to the minutes. The Chair noted that they were 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.

### Modification Workgroups

#### 5. [0649S - Update to UNC to formalise the Data Enquiry Service Permissions Matrix](#)

The Chair noted that this Workgroup is being held jointly with the UNC and the aim of the meeting is to complete the Workgroup reports for both UNC649S and IGT115.

BF introduced the Workgroup report noting that most areas had already been agreed at the previous Distribution Workgroup. The Workgroup noted that they believe Self-Governance is the correct choice for this modification.

The Workgroup discussed the proposed solution and noted the additions made to the solution to clarify the process for new applicants. DA noted that new applicants access to data would have to be approved via a Modification and that this would be decided on a case by case basis.

DA noted that should this Modification be implemented, it is likely to lead to the withdrawal of UNC Modification 0663S and its equivalent IGT Modification (IGT0114) - Extending the data comprised under the definition of Supply Point Premises Data (TPD V5.18.1) as it would be superfluous.

The Chair noted that the Legal Text provided references instruction to the CDSP to change the Data Matrix by an instruction from Contract Managers. SM suggested that the term DSC Contract Management Committee is used as this would be consistent and would prevent possible confusion that a DSC Contract Manager could instruct a change in isolation.

The Workgroup agreed that the modification would have a positive impact on Relevant Objective F) Promotion of efficiency in the administration of the Code. The Workgroup resolved that this modification no longer had a positive impact on Relevant Objective D) Securing of effective competition and agreed to document this in the report.

The Workgroup reviewed the suggested timetable for the progression of this modification and highlighted that this was based on a Self-Governance process. The Workgroup stressed the importance of aligning the implementation of IGT115 and UNC649S and noted that the likely implementation date of this modification would be after the scheduled November release date. The Workgroup was satisfied with the timetable proposed for this Modification. However, it recommended that the Panel could consider delaying the date of the November release to 9<sup>th</sup> or 10<sup>th</sup> of November

to accommodate this modification and eliminate the need for an extraordinary release if this modification is implemented.

BF completed the Workgroup report for UNC649S.

## [IGT115 – Update to IGT UNC to formalise the Data Permissions Matrix](#)

The Workgroup reviewed IGT115 and agreed with the Proposers view that this Modification should be Self-Governance.

The Workgroup discussed the additional paragraphs added to the varied modification and was happy that this reflected discussions on how new entrants would be dealt with which were had at the UNC Distribution Workgroup on the 23rd August 2018.

Alongside the UNC modification, the Workgroup agreed that the modification would have a positive impact on Relevant Objective F) Promotion of efficiency in the administration of the Code and agreed that this modification does not specifically promote Relevant Objective D) Securing of effective competition, therefore, resolved to note this in the report.

The Workgroup agreed with the implementation date and recommendation outlined in UNC649S.

The Workgroup agreed that the proposed legal text for IGT115 (which was published separately to the legal text in the Modification on behalf of the IGTs) supports the proposed solution.

**Action MWS18/09-01: CA to finalise the Workgroup report for IGT115 and add this to the Final Agenda for the September Panel meeting.**

## **6. [IGT113V – Amendments to the CSEP NExA Table Ancillary Document and associated templates](#)**

CB presented the varied modification to the Workgroup. CB noted that areas of change were to give clarity to what the modification is trying to achieve. CB noted that the modification has been changed to Self-Governance following discussions at the last Workgroup. CB added that the implementation date has also been changed and the intention is for implementation in February 2019, for use in 2020.

KD noted that this timetable would not allow for the codified six-month lead time on system changes.

The Workgroup discussed the implementation dates for this modification at length, considering a phased implementation may be appropriate as the AQ review process is long and is itself phased. The Workgroup discussed the Proposers suggested implementation date of the scheduled February release and Shipper representatives highlighted that this would not allow the Codified six months lead time for system changes.

The Workgroup noted that unless both the CSEP NExA Table template and the descriptions in the current CSEP NExA Table (CSEP NExA Tables Ancillary Document) are amended for the 2019 implementation, the proposed drafting in this modification would not be able to be fully implemented until 2021. This would be due to the requirement for Shippers to have twelve months' worth of data with the proposed property types. The Workgroup suggested that a specific question is asked at

consultation around whether shippers are able to make system changes in time for the scheduled February release date.

The Workgroup discussed the suggested solution and felt more detail was needed around the reasons for why the additional property types had been included in bands F and G, and why properties of nine bedrooms and above had not been included. The Proposer noted that following an assessment of values already being operationally used by IGTs during the PSR process 4BB, 4BF, 5BT, 6BS, 6BT, 7BD and 8BD are widely used and currently validated by some Shippers. The proposer added that codifying these values will make it clearer for industry going forward. It was also discussed that additional legal text should be included to clarify properties over nine bedrooms. With the Proposer noting that these types of properties are extremely rare on an IGT network and that creating a 'catch-all' value may affect the AQ average of Band G unfairly, therefore, it was decided that this was not an appropriate action to take within the scope of IGT113.

The Workgroup discussed the additional properties types being added to the CSEP NExA Template as a result of this modification and agreed that there will be no material change as a result of the suggested solution. The Workgroup was happy that the solution gives transparency to property types already being used operationally in the industry and that there will be no consumer impacts. This is because the additional property types are already assigned to the relevant existing bands albeit using the nearest existing property type.

The Workgroup agreed that the modification would have a positive impact on Relevant Objective F) Promotion of efficiency in the administration of the Code.

The Workgroup discussed the suggested legal text in this modification. The Workgroup was happy with the suggested changes to the CSEP NExA Table template, however, suggested adding a line to the IGT CSEP NExA Table Review Procedures ancillary document in order to dispel any ambiguity around how to process properties nine bedrooms and above.

The Chair suggested that BU-UK submit a further varied modification including the amendments to the solution and legal text.

**Action MWS18/09-02: CB to amend the modification proposal for IGT113V and resubmit this to the CA for publication.**

**Action MWS18/09-03: CA to finalise the Workgroup report for IGT113V and add this to the Final Agenda for the September Panel meeting.**

## 7. [IGT114 – Extending the data available to Suppliers under K24.3\(l\)](#)

The Workgroup agreed to hold talks on this modification in light of the development of IGT115. As noted in Item 5, it is likely that IGT114 will be withdrawn if IGT115 is successfully implemented.

## Review groups

## 8. [RG004 – Review of IGT Governance and administration arrangements](#)

The Chair introduced the Request for Information (RFI) summary document noting that the RFI received 12 responses from IGTs, GTs, Shippers and Xoserve.

The chair noted that generally, Industry indicated that whilst the total amalgamation of both the IGT UNC and UNC was, in practice, a good idea, there was either not sufficient evidence at present to suggest that the IGT UNC governance was in imminent need of such major change or that there was currently too much other change (e.g. Retail Energy code, Faster Switching) in the industry and it was not a priority at this time. There was, however, support for some suggested solutions which would help the efficient running of the Code.

The Review Group reviewed responses to the suggested solutions as outlined in the [summary document](#):

**Option 1** – Three parties supported this option, however, most felt now was not an appropriate time for change and that this should perhaps be directed through a Significant Code Review (SCR).

**Option 2** – Two parties supported this option.

**Option 3** – No support

**Option 4** – One party supported this option, although it was acknowledged that this option may have been confused with option one (Full amalgamation of IGT UNC and UNC, which would include changing the UNC text. Any distinctively different sections would be put into a UNC ancillary document).

**Option 5** – One party supported this option as well as option two.

**Option 6** – No direct support as parties who agreed with the problem statement did wish to see some change. However, three parties either felt that this was not the right time for change or didn't see sufficient evidence for change.

Two further options were suggested by respondents.

**Option 7** - Set up a Cross Code working Group to look to improve the current modification process across both the IGT UNC and the UNC. JC noted that for Brookfield option two reform was too far and suggested that a cross-code working group, whether a one-off or a monthly meeting between the IGT UNC and UNC would be beneficial. RF queried whether this would look at and assess the current modification governance process or look at actual live modifications in the industry. JC confirmed that this would be to assess where the problems are with the modification governance and explore appropriate solutions to address those problems. Building on work already conducted as part of RG004.

KD suggested that another option could be for the Code Administrators to work more closely in jointly assessing proposed legal text earlier in the process to ensure that IGT UNC impacts remain minimal. As well as adopting a 'Code Manager' approach which the BSC and REC (Retail Energy Code) currently and will be utilising.

**Option 8** - Increase efforts to encourage Shippers to fill the Panel vacancies, particularly focusing on smaller shippers who traditionally have not been involved.

The Review Group recommended that a summary update report is sent to the IGT UNC Panel to request that the Review Group meet a further two times in order to discuss further the two options indicated by industry together with a further option put forward by a respondent to the RFI to assess which if any may be the most appropriate to for potential further development. KD requested that the CA invite representatives from the Joint Office to further meetings to discuss:

- Option 2 - To create a common UNC and IGT UNC modification process so that when a modification is raised under the UNC it considers the IGT UNC and requires any changes to the IGT UNC legal text to be produced simultaneously;
- Option 5 - Allowing the Code Administrator to raise non-material modification proposals on behalf of industry in order to cut down on duplicated resource, and reduction in the frequency of modification workstream meetings; and
- Newly proposed Option 7 - Set up a Cross Code working Group to look to improve the current modification process across both the IGT UNC and the UNC.

**Action MWS18/09-04: CA to write a summary document for the IGT UNC Panel to noted that Workgroups recommendations on RG004.**

## 9. 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
666	Establishment of a CSS Bid Group for CDSP central switching system bid activities	The Workgroup noted that this had no impacts on the IGT UNC and <b>resolved to remove this from the tracker.</b>
665	Introduction of suitable classification of Ratchetable Supply Points & ensuring accurate Capacity Allocations (SOQ)	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.
664	Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4	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.
663	Extending the data comprised under the definition of Supply Point Premises Data (TPD V5.18.1)	Scottish Power has raised IGT114 and is currently being developed in a Joint Workgroup with the UNC. This modification may be withdrawn by the proposer if IGT115 is implemented.

661	R Reconciliation and Imbalance Cash Out Prices	The Workgroup resolved to monitor this Review group. The workgroup report is due to be returned to Panel in <b>March 2019</b> .
660	Amendment to PARR permissions to allow PAC to update with UNCC approval	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.
659	Improvements to the Composite Weather Variable	The Workgroup noted that this modification has been separated out of UNC644. There will be some areas of crossover with the IGT UNC. The Workgroup resolved to monitor this until the legal text has been released, however, the proposer of this modification believes that there will be no implications on the IGT UNC.
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. Although analysis on the Code would suggest that any changes to the PARR report would be sufficiently covered in 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. The UNC has not yet met to discuss this as the July meeting was cancelled.
654	Mandating the provision of NDM sample data	IGT110 is currently out for consultation and closed on 7th September 2018.
652	Obligation to submit reads and data for winter consumption calculation (meters in EUC bands 3 - 8)	The Workgroup resolved to monitor this modification as legal text has not yet been released and this may have an effect on the IGT UNC. The Proposer of UNC652 confirmed that he will be raising a modification in the IGT UNC dependent on the finalisation of legal text for this modification.
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	IGT115 workgroup report has been finalised and will be sent to the September Panel for consideration.



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 nontelemetered 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. ESPUG have drafted a modification proposal and intend to bring this to the next WG meeting for discussion.
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 an impact assessment in this review group. <b>The review group closure report is due to be completed in September 2018.</b>
623	Governance Arrangements for Alternatives to Self-Governance Modification Proposals	This modification has been passed for implementation and was included in a release on 20 <sup>th</sup> April 2018. The IGT UNC will require an equivalent modification if deemed necessary.

## 10. Password Protection Protocol - Review

The Workgroup reviewed the amended ancillary document prepared by E.ON. RK noted that several suggestions had been made to the document to either bring the document up to date with relevant guidelines or to make areas of the document less specific and therefore more in line with ISO standards.

KM queried whether some of the guidance was still relevant and therefore making this more generic would be detrimental to those changing password, for example, after a data breach. RK noted that E.ON will be sponsoring a modification which will look to make changes to the ancillary document and noted that this will be drafted to conform with current standards.

KD added that any changes suggested would not be changing already existing arrangements for IGTs but would be strengthening and future proofing the document.

The Workgroup noted the update.

## 11. Ratchet Charging

The Chair noted that a review had taken place following the last Workstream meeting on areas of the Code that contain references to Ratchet charging.



The Chair noted that in the IGT039 text there were numerous instances where qualifications were added to the IGT UNC in relation to sections of the UNC that were now pointed across to. Because of the “point across approach” some additional references to Supply Point Ratchets in the UNC have effectively become incorporated into the IGT UNC.

The Chair noted that the areas of the Code where Ratchets are referenced is Part CI, Part CII, Part E and Part M.

The Chair noted that through discussions with BUUK there is no opportunity for IGTs to detect when a ratchet charge should be levied. KM warned that removing any point across to the UNC or details of Ratchet charging in the IGT UNC would put IGTs into a difficult position in the event that a Ratchet charge would need to be given to a Shipper, and particularly because this is a safety issue.

The Workgroup acknowledged the update and was happy to see how the newly raised UNC modification (UNC665) progresses before taking further action with this.

## **12. Confirming Shipper vs Elected Shipper reporting**

PO noted that a report is being prepared by Xoserve which will detail the outcomes of a recent analysis of ‘gazumping’ of Shippers on IGT Meter Points where the confirming shipper is not the elected shipper. PO noted that the initial analysis shows very low numbers of this occurring over the past year, and only one incident in July 2018. PO noted that a full report should be prepared in time to be brought back to the October Workstream meeting.

## **Operational Issues**

## **13. AQ review**

The Workgroup resolved to defer this agenda item to the next meeting.

**Action MWS18/09-05: CA to add AQ review ancillary document to the October Workstream Agenda.**

## **14. MPRN range allocation process**

RC noted that following the recent MPRN range allocation to Murphy Gas Networks, Shippers have highlighted that Murphy do not currently appear on the UK link system and do not have a Market Domain Data (MDD) short code. KD noted that because of this any PSRs cannot be validated and that there appears to be a gap in the process.

KD suggested that an extra step to the process be added to make sure that all new entrant IGTs have an MDD short code before any allocations are made.

RC suggested that a review of the process be carried out and noted that as this is not a UNC document there does not need to be any official governance around the document.

**Action MWS18/09-06: CA to review the MPRN range allocation process and make necessary amendments to ensure that industry participants are not allocated ranges before an MDD short code is allocated.**

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

The Workgroup reviewed the current items recorded on the known issues register and noted that all items remain outstanding at present. The workgroup resolved to add the following issues for the following reasons:

- MPRN process – see agenda item 14.

#### **16. AOB**

None.

**The next IGT UNC Modification Workstream Meeting is on 2<sup>nd</sup> October 2018**

### **Appendix 1**

MWS18/06-01	5 <sup>th</sup> June 2018	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.	RJ	Closed. RJ to bring further requirements to a future workstream.
<b>MWS18/07-03</b>	<b>3<sup>rd</sup> July 2018</b>	<b>RJ to speak with Nicky Rozier (BUUK) with regards to UNC647 and bring draft modification back to August meeting.</b>	<b>RJ</b>	<b>Carried forward</b>
MWS18/08-01	7 <sup>th</sup> August 2018	CA to send out a reminder for parties to respond to the RG004 RFI.	CA	Closed.

MWS18/08-02	7 <sup>th</sup> August 2018	CA to finalise the Workgroup report for IGT110S and add this to the Final Agenda for the August Panel meeting.	CA	Closed.
MWS18/08-03	7 <sup>th</sup> August 2018	KD to prepare a draft briefing paper to the Code Administrator for comments.	KD	Closed.
MWS18/08-04	7 <sup>th</sup> August 2018	Code Administrator to send out IGT112 briefing paper to the distribution list.	CA	Closed.
MWS18/08-05	7 <sup>th</sup> August 2018	CB to amend the IGT113 Modification Proposal and resubmit this to the CA before the next Workstream meeting.	CB	Closed.
MWS18/08-06	7 <sup>th</sup> August 2018	CA to add Password Protection Protocol to the September meeting Agenda.	CA	Closed.
MWS18/08-07	7 <sup>th</sup> August 2018	Chair to review the IGT UNC Code with regards to Ratchet charges and report back to the Workgroup.	Chair	Closed.
MWS18/08-08	7 <sup>th</sup> August 2018	CA to communicate with Cher Harris on the lack of access to the information required for the AQ review and report back to the Workgroup.	CA	Closed.
<b>MWS18/09-01</b>	<b>4<sup>th</sup> September 2018</b>	<b>CA to finalise the Workgroup report for IGT115 and add this to the Final Agenda for the September Panel meeting.</b>	<b>CA</b>	<b>New</b>
<b>MWS18/09-02</b>	<b>4<sup>th</sup> September 2018</b>	<b>CB to amend the modification proposal for IGT113V and resubmit this to the CA for publication.</b>	<b>CB</b>	<b>New</b>
<b>MWS18/09-03</b>	<b>4<sup>th</sup> September 2018</b>	<b>CA to finalise the Workgroup report for IGT113V and add this to the Final Agenda for the September Panel meeting.</b>	<b>CA</b>	<b>New</b>
<b>MWS18/09-04</b>	<b>4<sup>th</sup> September 2018</b>	<b>CA to write a summary document for the IGT UNC Panel to noted that Workgroups recommendations on RG004.</b>	<b>CA</b>	<b>New</b>
<b>MWS18/09-05</b>	<b>4<sup>th</sup> September 2018</b>	<b>CA to add AQ review ancillary document to the October Workstream Agenda.</b>	<b>CA</b>	<b>New</b>

<b>MWS18/09-06</b>	<b>4<sup>th</sup> September 2018</b>	<b>CA to review the MPRN range allocation process and make necessary amendments to ensure that industry participants are not allocated ranges before an MDD short code is allocated.</b>	<b>CA</b>	<b>New</b>
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