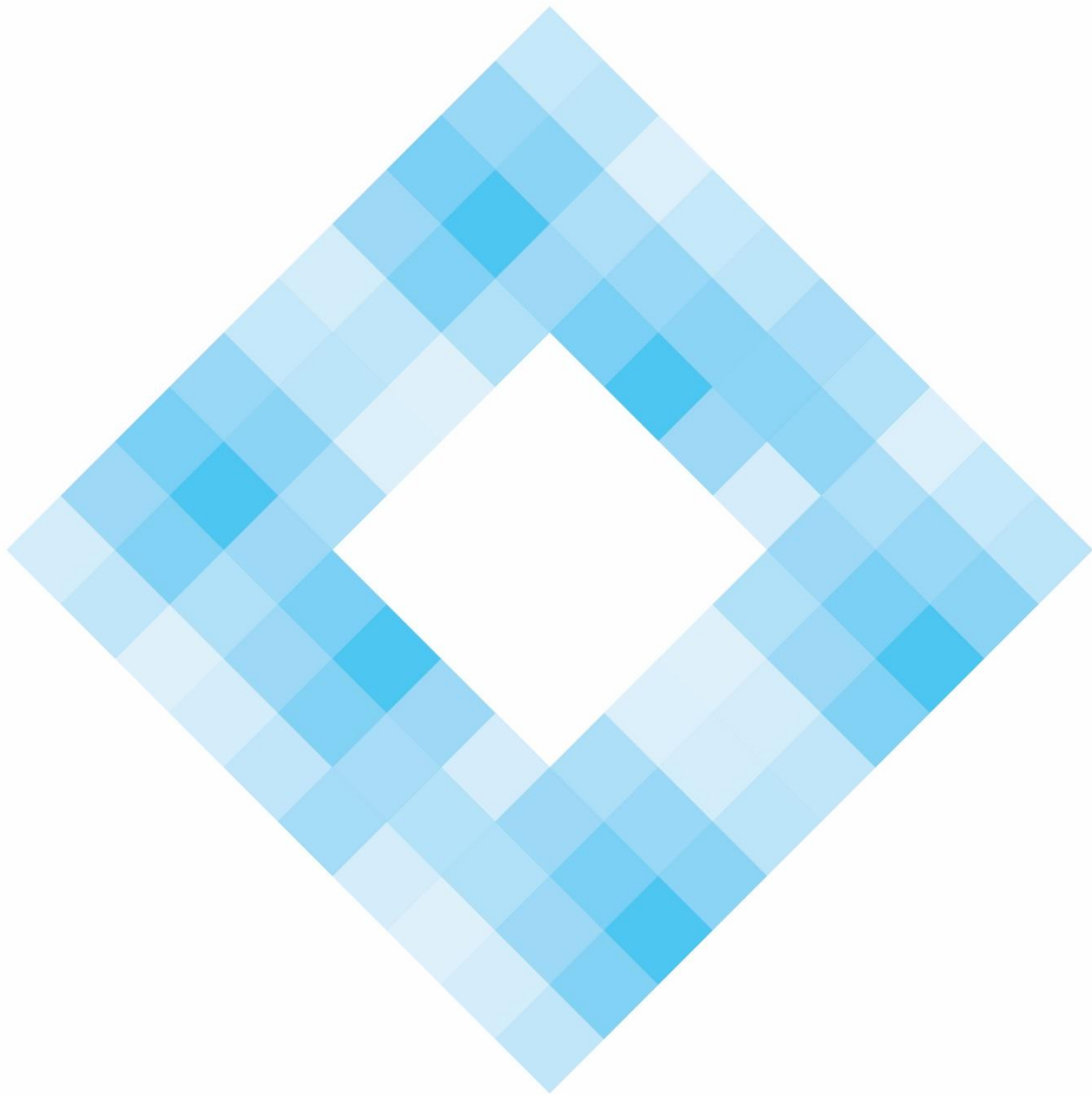


# RG004 – Way Forward Summary

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# Background

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In July 2018 an RFI was issued to industry seeking their views on the proposed problem statements and proposed solutions developed throughout the RG004 discussions. It also sought to find out their company's preference in moving forward and requested any opinions on areas the review group may have missed.

The September Workgroup discussed the results of the RFI, which can be found on the IGT UNC website.

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 for 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.

Following the RFI the meetings have discussed the following options:

- ♦ **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 2A (outline for development)**

A special type of modification proposal is raised by either party to the IGT UNC or UNC. This would then be viewed by both the IGT UNC Panel and UNC Panel and, if accepted, MUST be referred to a Joint Workgroup meeting for discussion. The modification process is identical to those now in both Codes, and a joint Workgroup report would be produced, presented to the respective Panels, and again if accepted, a DMR sent out for a joint consultation (both IGT UNC & UNC legal text should be available at this stage). (N.B Both Panels will be able to determine that at any time up to the point where the recommendation on the FMR is made, that the joint modification process should discontinue. At this point individual Code modifications could then be progressed under single governance if desired). An FMR would be produced and the UNC Panel would vote on the implementation, consistent with the current UNC voting process. Agreement to implement (either by the UNC Panel or by the Authority) will be a direction to change both the UNC legal text and the IGT UNC legal text – e.g. both Code Administrators will make the required changes to their respective legal texts via a Code release which will be aligned.

- **Option 2B**

Separate modifications are raised at the same time and follow a similar modification process via joint workgroups to develop modifications and legal text concurrently. Voting rights will remain separate and implementation aligned. The driver for this Option could be that UNC and IGT UNC

impacts would be discussed at the same time and in the same (joint) workgroup thus eliminating the need for separate IGT UNC workstream discussion.

- ♦ **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.

## Original Problem Statement Analysis

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1. Much IGT UNC work is administrative and is resulting in industry resources not being used in the most efficient manner.
2. Engagement and attendance at IGT UNC Modification Workstreams has decreased, which could negatively impact the suitability of solutions developed by the group to be implemented by the market.
3. Shipper positions on the IGT UNC Modification Panel are not being filled, creating a potential issue with quoracy.

### Review Group view on the Problems (based on RFI feedback and Review Group meetings)

#### PROBLEM 1

The Review Group recognises that there are a number of Modifications now going through the IGT process that have been instigated by UNC, rather than IGT, driven change. Whilst it may have been expected that Single Service would have reduced this aspect it is clear that the issue will continue to ensure both codes remain properly aligned. It is also noted that a GT cannot raise a Modification to the IGT UNC

#### PROBLEM 2

Review Group is still generally confident that Workstream attendance does not appear to be an issue. It is however agreed that a lot of time is spent at Workstreams going through UNC Mods to identify if there are potential IGT issues.

#### PROBLEM 3

Since the Review was raised, Panel quoracy has been resolved with there now being three IGT representatives and three Shipper representatives.

## Review group Summary on how the proposed options address the problems

Overall the Review Group believes the main focus should be to improve the Code processes so that parties in both codes are aware, at the earliest opportunity, where a proposed change could have impacts on both Codes. As such if there is more work to be done and it should focus on streamlining and harmonising the Code modification process and by additional cooperation between the CAs, Panels and Workgroups.

There was not majority support (at this time) that this justified the creation of a single Modification process (Option 2A) as this was felt to be a major piece of work for both the IGT UNC and for the UNC. UNC parties specifically did not have the same concern that the Modification process was in need of change.

There was a lot of support for Option 2B (to further harmonise the processes across the two Codes) and some support for Option 5 (to allow the IGT CA to raise non-material modifications) although this will need a Modification to be raised and may also require confirmation that it is within the scope of the current Transporters Licence.

It was also recognised that Option 7 (via a Cross Code Working Group) could be a good way to address the issues and introduce improvements.

## Further issues discussed by the Review group

Main issues which should be addressed when progressing IGT UNC mods under a “Joint UNC/GT UNC” process:

### A. **Delivery of the Modification -**

- Panel Meetings/delivery timings – the IGT UNC Panel currently meets on the 3rd Wednesday of a month whilst the UNC Panel meets on the 3rd Thursday. This means that normally the IGT Panel has difficulty confirming its decision for an IGT Modification which has been raised alongside an equivalent UNC because it does not know what the UNC Panel will decide.
- Workgroup meetings for the two Codes also differ with the UNC covering most relevant Mods in its Distribution workstream (tends to be 4th Thursday) and the IGT UNC covering Mods at its Workstream (2nd Tuesday).
- This can mean that when a Mod is raised in the UNC it may not always be evident that there could be impacts on the IGT UNC. If the IGT UNC only becomes aware at some later point, then it may struggle to catch up with the UNC Mod (in order to align implementation) when it still has to go through the full modification process.

- B. **Production of the Legal text for the IGT UNC -**
- UNC legal text currently is often delayed until the Modification is sent out to Consultation. This is generally too late to then develop legal text for the IGT UNC if the consultation process is to be aligned.
- C. **Implementation Date -**
- The UNC tends to implement most mods which do not require system changes at the earliest opportunity after the appeal window has closed. The IGT UNC prefers to batch changes up into releases (3 per year). Also relying on waiting for the UNC to set an implementation date causes uncertainty for the IGT UNC process and makes it difficult for the IGT UNC Panel to ensure implementation is aligned.

## Review Group Summary of how Options 2, 5 and 7 address the above

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**Option 2A** is intended to address much of the above by effectively only having a single process for both Codes. Overall this would require Modifications to both the UNC and the IGT UNC.

**Option 2B** should assist but it still dependent on parties recognising at the earliest point that a modification to one Code will impact the other Code.

**Option 5** may also help where it has only come to light later on in the process that a UNC modification will have IGT UNC impacts. Under this Option the IGT CA can raise a Fast Track Modification which should be able to be implemented in a far shorter time that under the full modification process.

**Option 7** could assist by (similar to 2B) making the communication process between the two Codes more formal, such that the individual CAs may recognise that a proposed issue/modification is likely to impact both Codes and then be able to advise their respective Panels accordingly.

## Next Steps

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The Workgroup are asked to take into consideration the above collated analysis and make a recommendation to the Panel to close the Review group. The Workgroup may also wish to make further suggestions re the above solutions, in terms of whether one or more should be progressed and if so, the best way to do this.

# Appendix 1

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## Additional Modifications raised since the RFI was issued out

**IGT111 - Updating of the Data Permissions** – IGT UNC Specific (related to UNC work but valid in its own right for the IGT UNC)

**IGT112 - Refinements to the RPC Template** – IGT UNC Specific

**IGT113 - Amendments to the CSEP NExA Table Ancillary Document and associated templates** - IGT UNC Specific

**IGT114 - Extending the data available to Suppliers under K24.3(I)** - SSP/CDSP changes align with UNC change

**IGT115 - Update to IGT UNC to formalise the Data Permissions Matrix** - SSP/CDSP changes align with UNC change

**IGT116 - Enabling permissions for the provision of information to Alt Han Company to support smart metering roll-out** - SSP/CDSP changes align with UNC change

**IGT117 - Introduction of winter read/consumption reports and associated obligations** - UNC/Code alignment changes

### Summary

- Three raised to address IGT UNC improvements (111,112,113)
  - Three raised to introduce new business areas that apply to both the UNC and the IGT UNC - probably suitable to be covered under a common mod process (114,115,116)
  - One raised to align IGT UNC with UNC code changes - suitable for a common mod process (117)
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- 2015 – 13 raised – 9 IGT specific
  - 2016 – 11 raised – 5 IGT specific
  - 2017 – 12 raised – 6 IGT specific
  - 2018 (July 2018) – 6 raised – 1 IGT specific
  - **2018 updated – 13 raised – 4 IGT specific**

## Appendix 2

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### **Relevant documents**

Below is a list of relevant documents produced by the Review group:

- [Problem Statement analysis;](#)
- [Request for information;](#)
- [Appendix A – Solutions;](#)
- [Appendix B – Attendance;](#)
- [Appendix C – Modifications;](#)
- [Summary of responses v1.1;](#) and
- [Collated responses.](#)