

## **IGT UNC Modification Panel Meeting 18-10**

**Wednesday 17th October 2018**

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

<b>Attendee</b>	<b>Organisation</b>	<b>Representing</b>	<b>As</b>
Steve Ladle (SL)	Gemserv	Code Administrator	Chairman
Mark Jones (MJ)*	SSE Energy Supply	Pipeline Users	
Jenny Rawlinson (JR)*	BU-UK	Pipeline Operator	Items 1 – 14 only
Cher Harris (CH)*	Indigo Pipelines	Pipeline Operator	
Rob Johnson (RJ)*	ESPUG	Pipeline Operator	
John Welch (JW)*	Npower	Pipeline Users	Item 11 only
Raymond Elliot (RE)*	Ofgem	Authority	
Rachel Clarke (RC)	Gemserv	Code Administrator	Secretariat

*\*Attended via teleconference*

### **1. Alternates, observers and apologies**

The Chair welcomed attendees to the meeting of the IGT UNC Modification Panel meeting. Rob Johnson (ESPUG) was nominated as the alternate for Victoria Parker and John Welch (Npower) joined the meeting to present IGT117 to the Panel. Apologies were received from Kirsty Dudley (E.ON) as well as Kate Mulvany (British Gas) and Mark Jones (SSE Energy Supply) was appointed as their alternate.

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

The Chair asked the Panel if they had any additional items to add to the agenda for this meeting. The Panel had no further business to add to the agenda, however the Code Administrator added one AOB around 2019 Panel meeting dates.

### **3. Approval of the previous minutes**

RC informed the Panel that no comments had been received regarding the September Panel meeting minutes prior to the meeting. The minutes from the previous Modification Panel meeting (19<sup>th</sup> September 2018) were approved as a true and accurate record of the meeting.

### **4. Outstanding actions**

18/09-01	Code Administrator to add RG004 to a further two Workstream agendas.	Closed.
18/09-02	Code Administrator to speak with the Joint Office to ensure that IGT116 and UNC668	Closed. Discussed at the UNC Distribution Workstream meeting.

	are progressed in a Joint Workgroup.	
18/09-03	Code Administrator to send IGT113VV out for consultation with a closing date of 10th October 2018.	Closed. FMR discussed in agenda item 14.
18/09-04	Code Administrator to add a question in the IGT113VV consultation about system impacts for both Transporters and Shippers.	Closed. FMR discussed in agenda item 14.
18/09-05	Code Administrator to send IGT115 out for consultation with a closing date of 10th October 2018.	Closed. FMR discussed in agenda item 14.
18/09-06	Code Administrator to add a question in IGT115 consultation about impacts of delaying the November release.	Closed. FMR discussed in agenda item 14.
18/09-07	Code Administrator to request a Resolution in writing (as per IGT UNC Part L7.7) for a decision on IGT110V as soon as practical following the UNC panel meeting and eventual decision on UNC654.	Closed.
18/09-08	Code Administrator to notify all parties that IGT111 has been decided by the Panel and will be scheduled for implementation in the November release.	Closed.

RC concluded that all action points from the last meeting are now closed.

## 5. Short Notice business

None.

## 6. Panel Decision

None.

## 7. Update on Review group

### RG004

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

The Chair noted that at the October Workgroup members further discussion was held on the three suggested ways forward:

- 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.

The Chair noted that the group felt option 2 went too far, and that option 7 did not directly address the issues, rather that it facilitated any discussions that would address an issue. The group felt that option 5 was potentially the most fitting and would ease the burden of raising non-material housekeeping changes on the industry.

The group asked the Code Administrator to track back these solutions to the original problem statement and data analysis. The Chair noted that this paper will be available for the next workgroup meeting, where the Workgroup report will be completed.

MJ noted that the UNC governance workgroup has taken an action to review the current arrangements around procuring legal text to make this more centralised and to work across codes. MJ noted that this may ease some of the issues faced.

JR noted that the review group has been worthwhile in airing the difficulties faced working cross code and it is encouraging to see the participation in this discussion. JR added that it has been useful to gauge industry appetite for change.

## **8. Update on Workgroups**

### [IGT112 – Refinements to the RPC Template](#)

The Chair noted that this modification was discussed at a special technical subgroup meeting, which developed the Ancillary document. This was then presented to the October Workstream meeting with the group, with a general consensus that the suggested changes to the document are developing well. The October workgroup suggested changing the name of the document in order to reflect that the ancillary document currently covers more than just RPC invoices.

The Chair noted that the Technical subgroup will be meeting again to finalise the drafting of the ancillary document with the intention that this will be sent to the November Workstream and the Workgroup report finalised.

The Panel noted the update.

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

The Chair noted that if IGT115 is passed for implementation today by the Panel, the proposer of IGT114 would likely be withdraw this modification.

The Panel noted the update and agreed that holding the modification in the process was the most pragmatic approach in the circumstances.

## [IGT116 – Enabling permissions for the provision of information to Alt Han Company to support smart metering roll-out](#)

The Chair noted that this modification was discussed at the September UNC Distribution workgroup meeting as a Joint Modification with UNC 668S and although it was thought this would be a straightforward modification it has attracted a lot of discussions. MJ noted that the CDSP presented two solutions at the meeting and noted that much of the discussions will be around contractual arrangements.

The Chair concluded that the UNC Panel has resolved not to make a decision on this modification until January 2019, and so it is likely this will go back to more than one workgroup.

The Panel noted the update.

### **9. Withdrawn Modifications**

None.

### **10. Urgent Modification Proposals received**

None.

### **11. Non-urgent Modification Proposals**

## [IGT117 – Introduction of winter read/consumption reports and associated obligations](#)

JW introduced the modification noting that this modification seeks to create an obligation, and associated monitoring reports, to support the process for shippers to submit reads and correct data, to ensure the appropriate winter consumption calculation takes place, for accurate NDM WAR band profiling. This modification will ensure that the appropriate IGT UNC clause is created to cover IGT supply points in the process. JW noted that Xoserve has found multiple sites with high AQ values which have a winter consumption profile – almost 25% of these sites have a default Winter Consumption profile as Shippers have not submitted relevant readings.

Through the development of the modification it appears that there is already an obligation placed on parties to submit a monthly read on these sites, so instead of adding another obligation, this modification now builds on the already existing process. JW noted that on top of the obligation a suite of reports is proposed to be created by the CDSP both for industry and the Performance Assurance Committee (PAC). This will be designed around the gas year and will give Shippers a prompt to submit readings in the correct window.

JW noted that he is still awaiting the legal text drafting for this modification. The Chair noted that the IGT UNC may already point across to the UNC at a satisfactory level to be able to capture any changes proposed.

JR queried whether this modification seeks to create a reconciliation of those default sites. JW confirmed that this was the case and noted that the current two windows for submitting readings are November/December and March/April. The reports will be produced after both these periods to encourage submission. JR also queried whether this process would interfere with the rolling annual AQ process. JW noted that this would be a parallel process and therefore should not affect the rolling AQ, however, suggested this be discussed at the Workgroup.

The Panel agreed to send this modification to a Workgroup.

**Action 18/10-01: Code Administrator to add IGT117 to the November Workstream agenda.**

## **12. Fast-Track Modification Proposals**

None.

## **13. Workgroup Reports**

None.

## **14. Final Modification Reports**

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

The Chair noted that the consultation closed on 10<sup>th</sup> October and received three responses, two offered support to the modification and one offered qualified support. All respondents agreed that Relevant Objective F) was facilitated, with one noting that they believed Relevant Objectives D) was also met. All respondents agreed that this modification met Self-Governance criteria and most agreed that the legal text supported the requirements of the solution except one.

The Chair noted that ESPUG had made a suggested change to the legal text noting that the use of the words 'the below' was not appropriate. RJ noted that the use of 'the below' in the ancillary document suggests that the tables would appear below when in reality they are linked below in the document. RJ noted that the suggested amendment was not a material change. The Panel agreed that no material changes would occur and that the suggestion of 'linked below' gives clarity to the text.

All Panel members agreed that this Modification meets the criteria set out in Objective F and the published criteria for Self-Governance modifications.

The vote was carried out with three Pipeline Users and three Pipeline Operators. The Panel decided that the Modification should be implemented by a unanimous vote.

The Panel discussed implementation dates as there had been lots of discussions throughout the development of the modification. The Chair noted that the table is used by multiple parties for differing reasons, for example by Shippers to reconcile invoices and by IGTs for contractual agreements. The

Chair added that the suggested date for this modifications implementation is the February Code release, however, this would be cutting down system change timescales for Shippers.

JR noted that as the proposer of the modification, the February release is still proposed as no opposition was returned in the consultation responses. The Panel also agreed that as a self-governance modification this should be implemented in the February release. This will be subject to a 15-day appeal window as per the Self-Governance process.

**Action 18/10-02: Code Administrator to notify all parties that IGT113VV has been implemented by the Panel and will be scheduled for implementation in the February 2019 release.**

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

The Chair noted that the consultation closed on 10<sup>th</sup> October and received three responses, two offered qualified support to the modification and one offering support which were concerned with the implications of handling data permissions themselves. All respondents agreed that Relevant Objective F) was facilitated, with two noting that they believed Relevant Objectives D) was also met. One party felt that this modification no longer qualified as self-governance and should be sent to the Authority for decision as this could have a material impact on competition. All other respondents agreed that this modification met Self-Governance criteria and most agreed that the legal text supported the requirements of the solution except one.

The Chair noted that comments on the legal text re “take precedent” was taken from the proposed UNC legal text. The Chair noted that the wording should either be; “the Data Permissions Matrix will take precedence” or “the Data Permissions Matrix is precedent” would not in any way go beyond the intention of the modification and as such, could be made without a re-consultation. The Panel agreed with this amendment to the legal text for this modification.

RJ noted that ESPUG returned a qualified support as ESPUG agreed with the principals of this modification, however, felt that the solution was unclear and that there are still questions around the governance of future changes to the data permissions matrix. JR noted that BU-UK had similar concerns and are looking into the governance in this area. BU-UK were satisfied that any changes would be raised by a party and discussed in the DSC Change Committee where IGTs would have a fair and proportional vote as per any other voting forum. MJ added that any new user groups would still only be introduced into the matrix, and therefore able to access data items, via a new modification. The Chair confirmed that this was set out in the solution.

The Chair queried whether the Ofgem representative had views on a change from self-governance. RE noted that Ofgem does not have a view at this time, however, any change in governance would need evidence of materiality.

All Panel members voted and agreed that this Modification meets the criteria set out in Objective F and the published criteria for Self-Governance modifications.

The vote was carried out with three Pipeline Users and three Pipeline Operators. The Panel decided that the Modification should be implemented by a unanimous vote. The Panel agreed that, implementation of IGT115 without an implementation of UNC0649S would not make sense as the proposed IGT UNC legal text points across to UNC legal text that is being added by UNC0649S.

The Panel also discussed moving the date for the scheduled November release from 2<sup>nd</sup> November to 9/10<sup>th</sup> November to incorporate this modification and to avoid an unnecessary extraordinary release. The Panel felt that this was appropriate and noted that the modifications due to be included in the November release were not time critical.

The Chair suggested that it may be pragmatic to delay the decision making on this modification until the UNC panel has decided on UNC649S and therefore convene an Ex-Committee meeting as soon as practicable.

The Panel agreed to defer the decision on IGT115 until after a UNC decision has been made.

**Action 18/10-03: Code Administrator to request a Resolution in writing (as per IGT UNC Part L7.7) for a decision on IGT115 as soon as practical following the UNC panel meeting and eventual decision on UNC649S.**

## **15. Authority Updates**

None.

## **16. AOB**

RC noted that next month the 2019 meeting dates will be brought to the Panel for ratification. However, these have been based on the original schedule (3<sup>rd</sup> Wednesday of each month). RC noted that due to an increasing amount of modifications being deferred for decision until the UNC Panel has decided, the suggestion has been made to consider moving the Panel meeting until after the UNC Panel. RC resolved that it may be appropriate to move the IGT UNC Panel meeting to 3<sup>rd</sup> Friday of each month, this would keep enough time for inputs and outputs of the Panel meeting to the Workstream and vice versa.

The Panel noted this and asked for an alternative schedule to be prepared for the next meeting.

**Action 18/10-04: Code Administrator to prepare two scheduled 2019 meeting dates for decision at the November Panel meeting.**

**The next Modification Panel meeting will be convened on 21<sup>st</sup> November 2018.**

## Summary of Actions

Action Reference	Date	Action	Owner	Status
18/09-01	19 <sup>th</sup> September 2018	Code Administrator to add RG004 to a further two Workstream agendas.	CA	Closed.
18/09-02	19 <sup>th</sup> September 2018	Code Administrator to speak with the Joint Office to ensure that IGT116 and UNC668 are progressed in a Joint Workgroup.	CA	Closed.
18/09-03	19 <sup>th</sup> September 2018	Code Administrator to send IGT113VV out for consultation with a closing date of 10th October 2018.	CA	Closed.
18/09-04	19 <sup>th</sup> September 2018	Code Administrator to add a question in the IGT113VV consultation about system impacts for both Transporters and Shippers.	CA	Closed.
18/09-05	19 <sup>th</sup> September 2018	Code Administrator to send IGT115 out for consultation with a closing date of 10th October 2018.	CA	Closed.
18/09-06	19 <sup>th</sup> September 2018	Code Administrator to add a question in IGT115 consultation about impacts of delaying the November release.	CA	Closed.
18/09-07	19 <sup>th</sup> September 2018	Code Administrator to request a Resolution in writing (as per IGT UNC Part L7.7) for a decision on IGT110V as soon as practical following the UNC panel meeting and eventual decision on UNC654.	CA	Closed.
18/09-08	19 <sup>th</sup> September 2018	Code Administrator to notify all parties that IGT111 has been decided by the Panel and will be scheduled for implementation in the November release.	CA	Closed.
<b>18/10-01</b>	<b>17<sup>th</sup> October 2018</b>	<b>Code Administrator to add IGT117 to the November Workstream agenda</b>	<b>CA</b>	<b>New</b>



<b>18/10-02</b>	<b>17<sup>th</sup> October 2018</b>	Code Administrator to notify all parties that IGT113VV has been implemented by the Panel and will be scheduled for implementation in the February 2019 release.	CA	New
<b>18/10-03</b>	<b>17<sup>th</sup> October 2018</b>	Code Administrator to request a Resolution in writing (as per IGT UNC Part L7.7) for a decision on IGT115 as soon as practical following the UNC panel meeting and eventual decision on UNC649S.	CA	New
<b>18/10-04</b>	<b>17<sup>th</sup> October 2018</b>	Code Administrator to prepare two scheduled 2019 meeting dates for decision at the November Panel meeting.	CA	New