










IGT UNC Request Workgroup Report	At what stage is this document in the process?
<h1>RG004:</h1> <h2>Review of IGT Governance and Administration Arrangements</h2>	<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p>Purpose of Request:</p> <p>This Proposal seeks to undertake a review of the IGT UNC governance and administration arrangements and produce a summary of the Workgroups findings to the IGT UNC Panel for consideration.</p>	
	<p>The Panel will consider this Workgroup Report on 21st November 2018. The Panel will consider the recommendations and determine the appropriate next steps.</p>
	<p>High Impact:</p> <p>Pipeline Users, Pipeline Operators</p>
	<p>Medium Impact:</p> <p>N/A</p>
	<p>Low Impact:</p> <p>N/A</p>

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About this document:		 IGTUNC@Gemserv.com
<p>This document is a Workgroup report which recommends the conclusion of Review group 004. This will be presented to the panel on 21st November 2018.</p> <p>The Panel will consider the Workgroups recommendations and conclusions with respect to any subsequent modifications needed in light of the review groups findings.</p>		 02070901044
		Proposer: Mark Jones
		 mark.jones@sse.com
		 01443 827473

1 Request Summary

Why is the Request being made?

Following implementation of Project Nexus, IGTs became signatories to the Central Data Service Provider arrangements, with all IGT Supply Meter Points being recorded and administered within a consolidated central system. As a result of this, a majority of modifications in the UNC are resulting in corresponding changes requiring to be made in the IGT UNC. The result of this is that since Project Nexus significant IGT UNC Modification Workstream business has involved the assessment of the impacts of UNC modifications on the IGT UNC, resulting in parties raising mirror modifications to make the corresponding changes to the IGT UNC, or to make minor changes to IGT UNC references to the UNC due to the insertion or deletion of legal text within the UNC which has resulted from UNC modifications. This is resulting in most IGT UNC work being purely administrative and is resulting in industry resources not being used in the most efficient manner, and the lack of much genuine new IGT change is resulting in reduced attendance and business being discussed at the IGT UNC Workstream meetings. This request is being made for a workgroup to understand how the two codes could be better aligned, and potentially how the IGT UNC could be amalgamated into the UNC to create one code.

This review group will aim to produce a report that could have one of a number of potential recommendations, prior to a modification being raised in this area. Suggested potential recommendations are as follows:

- To amalgamate all common areas of the IGT UNC and the UNC into the UNC and to make all those areas that are not common to both codes, such as IGT invoicing and new connections an ancillary document to the UNC. This could have the effect of making the IGT UNC redundant;
- To create a common UNC and IGT UNC modification process so that when a modification is raised under the UNC it takes into account the IGT UNC and requires any changes to the IGT UNC legal text to be produced at the same time as the changes to the UNC legal text, effectively negating the need for mirror and cross-referencing modifications to be raised under the IGT UNC; or
- To amend the IGT UNC to reference the UNC at a much higher 'section type' level rather than at the clause level, so that when a UNC modification is implemented which results in the legal text changing the clause numbering within a section of the UNC, an IGT UNC modification is not required to reflect this new numbering.

Scope

It is proposed the scope of this review will be the whole of the IGT UNC (including ancillary, guidance and process documents), its alignment with the UNC and, potentially, how all of its arrangements could be moved into the UNC, with the creation of further ancillary documents to the UNC.

Impacts & Costs

No impacts or costs are envisaged to be incurred as a result of this work undertaken by this Request Proposal directly. A resulting modification may impact significantly on the IGT UNC governance and administrative arrangements. It is not envisaged that any recommendation made by this group will impact on central systems.

Recommendations

The objective of this Request Proposal is to produce a recommendation to the IGT UNC Modification Panel. It should be referred to a Workgroup as this will enable a thorough and collaborative review of options and enable a consolidated recommendation to be provided to the IGT UNC Panel based on industry input.

Additional Information

A request to review the arrangements will also be made under the UNC in the near future. Therefore, it is likely to be preferable to undertake these discussions in a joint review group after initial consideration by the IGT UNC Modification Workstream.

2 Impacts and Costs

Consideration of Wider Industry Impacts

Impacts

Impact on Central Systems and Process	
Central System/Process	Potential impact
UK Link	<ul style="list-style-type: none"> n/a
Operational Processes	<ul style="list-style-type: none"> n/a

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> n/a
Development, capital and operating costs	<ul style="list-style-type: none"> n/a
Contractual risks	<ul style="list-style-type: none"> n/a
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> All obligations relating to the IGT UNC may move to be under the UNC

Impact on Transporters	
Area of IGT business	Potential impact
System operation	<ul style="list-style-type: none"> n/a
Development, capital and operating costs	<ul style="list-style-type: none"> n/a
Recovery of costs	<ul style="list-style-type: none"> n/a
Price regulation	<ul style="list-style-type: none"> n/a
Contractual risks	<ul style="list-style-type: none"> n/a
Legislative, regulatory and contractual	<ul style="list-style-type: none"> All obligations relating to the IGT UNC may move to be

Impact on Transporters	
obligations and relationships	under the UNC
Standards of service	<ul style="list-style-type: none"> n/a

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	<ul style="list-style-type: none"> May become part of or be placed under the UNC
IGT UNC Panel	<ul style="list-style-type: none"> Less business to discuss and potentially redundant
General administration	<ul style="list-style-type: none"> Less administration and potentially redundant

Impact on Code	
Code section	Potential impact
All sections	<ul style="list-style-type: none"> Moved to the UNC directly or as ancillary documents

Impact on IGT UNC Related Documents and Other Referenced Documents	
Related Document(s)	Potential impact
IGT UNC Ancillary & Guidance Documents	<ul style="list-style-type: none"> Documentation update and move to under UNC
IGT Network Codes	<ul style="list-style-type: none"> Documentation Update

Other Impacts	
Item impacted	Potential impact
Security of Supply	<ul style="list-style-type: none"> n/a
Operation of the Total System	<ul style="list-style-type: none"> n/a
Industry fragmentation	<ul style="list-style-type: none"> n/a

Workgroup Impact Assessment

The Workgroup resolved that the suggested solutions put forward (option 2A, 2B, 5 and 7) would not have an impact on UNC parties as was initially anticipated. The Workgroup noted that there may be some impact on the Code Administrator, however, suggested this would be in the form of better working practices between the Codes when it comes to the Modification process.

3 Terms of Reference

Background

As outlined above, it is proposed to conduct a review of the IGT UNC and how the arrangements within it could be incorporated directly within the UNC

Topics for Discussion

- Understanding the objective
- Assessment of alternative means to achieve objective
- Development of Solution (including business rules if appropriate)
- Assessment of potential impacts of the Request
- Benefit of alignment with UNC
- Assessment of legal text.

Outputs

Produce a Workgroup Report for submission to the Modification Panel, containing the assessment and recommendations of the Workgroup including a draft modification where appropriate.

The Workgroup Report should consider the following:

- Review of available options;
- Assessment of option benefits from an industry perspective;
- Consideration of any identifiable risks, issues and dependencies

Composition of Workgroup

The Workgroup is open to any party that wishes to attend or participate.

A Workgroup meeting will be quorate provided at least two Transporter and two User representatives are present.

Meeting Arrangements

Meetings will be administered by Gemserv and conducted in accordance with the Code Administration Code of Practice.

4 Request for Information analysis

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.

Following various discussions, the Workgroup felt that options 2 and 5 were too extreme to address the issues the IGT UNC and UNC face. Option 7 was seen as more of a facilitation to the potential solution rather than an implement to address any issues there may be.

5 Modification(s)

Potential Modifications needed

The Workgroup agreed that there were no specific modifications to be raised as a result of this Review group.

6 Recommendation

Workgroup's Recommendation to Panel

The Workgroup asks Panel to:

- Recommend closure of RG004;
- Recommend that there are no specific requirements for a modification at the conclusion of the review group;
- Recommend that the modification templates & agenda formats are reviewed; and
- Recommend that there is more cross-code work carried out by the Code Administrators.

The Workgroup acknowledged that there has been a culture shift since Single Service, however, noted that there is more to be done by the GTs and IGTs getting together to discuss possible impacts on Code. The Workgroup suggested the monthly IGTAD meetings would be the best place to discuss this.

The Workgroup discussed the possibility of revising the modification templates to ensure that any proposer would have to take into account consequential changes, otherwise they would have to explicitly justify why there is no impact – this is opposite to what is needed in the current template.

The Workgroup discussed wider representation by the Code Administrators in other Forums and that Agendas could be structured differently to facilitate this.

7 Appendix 1

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](#);
- [Collated responses](#); and
- [RG004 Way Forward](#).