

# **IGT UNC Modification Workstream Meeting 18-12**

# Tuesday 4th December 2018

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee		Organisation	
Steve Ladle	(SL)	Gemserv	Chairman
Chris Barker	(CB)	BUUK	
Sebastian Eyre	(SE)	ES Pipelines	
Kate Mulvany	(KM)	Centrica	
Kirsty Dudley	(KD)	E.ON	
Megan Coventry	(MC)	SSE	
Mark Jones	(CT)	SSE	
Paul Orsler	(PO)	Xoserve	
Rachel Clarke	(RC)	Gemserv	Secretariat

## 1. Welcome and apologies for absence

The Chair welcomed attendees to the meeting of the IGT UNC Modification Workstream. Apologies were received from John Welch (Npower).

### 2. Confirmation of Agenda

The Chair confirmed the items for discussion as outlined in the final agenda. CB noted that he would like to discuss Housekeeping changes as AOB. The Chair agreed to take this as AOB, and also added two further points: a discussion on the new Code review being carried out by BEIS and Ofgem, and a request from a Third-Party Intermediary (TPI) regarding the MPRN range spreadsheet.

#### 3. Approval of the Previous Minutes

Attendees reviewed the minutes from the Modification Workstream meeting held on 6<sup>th</sup> November 2018 (18-11). RC noted that one comment had been received from E.ON prior to the meeting, which was the correction of a typo. 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.

#### 5. 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
674		Performance Assurance Techniques and Controls	The UNC Panel deferred discussions on this modification until their December meeting, however, the proposer has highlighted there may be IGT UNC implications. Has been added to the known issues register.
672		Incentivise Product Class 4 Read Performance	The Workgroup resolved to monitor this modification as the legal text has not yet been released and this may influence the IGT UNC. Has been added to the known issues register.
668	S	Enabling permissions for the provision of information to Alt Han Company to support smart metering roll-out	IGT116 has been raised by Npower and is currently being developed at the Workgroup.
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. CA to speak with Gazprom to ascertain whether an IGT equivalent modification needs to be raised to UNC665.
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. Goes to Panel in December. CA to speak to John Welch (Npower) about raising an IGT modification.
663	S	Extending the data comprised under the definition of Supply Point Premises Data (TPD V5.18.1)	IGT114 has been withdrawn by the proposer. The Workgroup resolved to remove this from the tracker.
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 March 2019.
659	S	Improvements to the Composite Weather Variable	This modification has been withdrawn by the proposer.  The Workgroup resolved to remove this from the tracker.
656		Changes to Modification Panel arrangements	This has been passed for implementation by Ofgem.  The Workgroup resolved to remove this from the tracker as this has been added to the known issues register for monitoring. See discussion below.
652		Obligation to submit reads and data for winter consumption calculation (meters in EUC bands 3 - 8)	IGT117 has been raised by Npower and is currently being developed at the Workgroup.
651		Replacement of the Retrospective Data Update provisions	This modification was not recommended by the UNC Panel and is currently with Ofgem for a decision.
647		Opening Class 1 reads to Competition	IGT119 has been raised by ESPUG and is currently being developed at the Workgroup.



630	R	Review of the consequential changes required in UNC as a result of the Ofgem Switching Programme	The Workgroup noted that this will affect the IGT UNC and noted that this should continue to be monitored. WG resolved that with the March 2019 deadline published for Codes to provide Ofgem with any consequential changes now is the time to raise an IGT UNC review group. BU-UK to raise a review group request for the December Panel. PO & CB to look at specific areas of the Code to review in priority.
623		Governance Arrangements for Alternatives to Self-Governance Modification Proposals	The Workgroup resolved to remove this from the tracker as this has been added to the known issues register for monitoring.

The Workgroup discussed UNC656 and the newly implemented elements of Panel arrangements. The Chair noted that there appears to be only one area for possible discussions where the IGT UNC and UNC now differ. UNC Panel members can now name two alternates who can attend Panel meetings in their absence. The current IGT UNC provisions only allow for one named alternate per Panel member. The Workgroup discussed the issue and noted that this should be added to the known issues register to monitor.

Action MWS18/12-01: CA to add UNC656 and the issue of two named alternates to the known issue register.

Action MWS18/12-02: PO to speak with CB (BU-UK) to look over areas of the Code to prioritise in a Switching review group.

Action MWS18/12-03: CA to speak with John Welch (Npower) to ascertain whether Npower will be raising an IGT equivalent modification to UNC664.

Action MWS18/12-04: CA to speak with Gazprom to ascertain whether an IGT equivalent modification needs to be raised to UNC665.

### **Modification Workgroups**

**6.** <u>IGT116V - Enabling permissions for the provision of information to Alt Han Company to support smart metering roll-out</u>

The Workgroup reviewed the Workgroup report for this modification, although noted that the IGT UNC Workgroup would not be able to progress this until the UNC distribution workgroup had reviewed UNC668S on 17<sup>th</sup> December. KD noted that the legal text has not yet been published by Scotia Gas Networks and that a meeting is being held on 7<sup>th</sup> December to develop this further.

The Chair noted that some suggested legal text has been developed for IGT116V and that this can be applied independently of the UNC text as this points to already existing text within the UNC.

The Workgroup agreed with the proposer's view that this modification should be progressed under the self-governance criteria.



The Workgroup agreed with the proposer's view that this modification will have a positive impact on Relevant Objective F. SE noted that this may also have a positive impact on Relevant Objective D (Securing of effective competition) by assisting the Smart Meter rollout to achieve its full objectives, and by creating a platform for functionality. The Workgroup acknowledged this point, however, noted that this was outside of the scope of the modification. KD reiterated that this modification only allows the AltHanCo to access GT and IGT data and does not look to suggest which data items they will be given access to. This will be decided in the DSC CoMC alongside any confidentiality agreements.

The Workgroup noted that this modification will need to be aligned to the UNC release date for UNC668S and recognised that this may result in a special release date.

The Chair noted that the aim is to complete this report, alongside UNC668S at the December Distribution workgroup meeting. RC noted that she would share the Workgroup Report with the Joint Office ahead of the meeting.

Action MWS18/12-05: CA to share the IGT116V Workgroup report with the Joint Office ahead of the December Distribution Workgroup meeting to be completed on the same day.

7. IGT117 - Introduction of winter read/consumption reports and associated obligations

The Chair noted that the legal text for UNC652 has not yet been finalised, however, a draft version has been shared with the CA. At present, the draft legal text would not result in any IGT UNC changes, however, this is subject to the final legal text being published.

The Chair suggested that Npower may wish to withdraw the modification following the publication of any finalised UNC legal text, if it remains that IGT UNC changes will not be required.

8. IGT119 – Opening Class 1 read services on IGT Meter Supply Points to Competition

SE introduced the modification noting that this proposes to bring into effect similar changes proposed under UNC 0647 that Open Class 1 reads to competition by introducing common arrangements for Class 1 and 2 by removing the obligation on IGTs to provide Daily Read services to Shippers for non-telemetered Class 1 Supply Meter Points located on IGT Networks.

SE noted that UNC647 will remove obligations in Section E of the IGTAD and will make changes in a number of other areas of the UNC which are referenced by the IGT UNC. Therefore changes will need to be made in the IGT UNC to incorporate these and in order to align the Codes.

The Chair queried whether the UNC modification would be incorporating the IGTAD changes. SE confirmed that this would be the case and noted that the obligation remains the same following the implementation of this modification, however, the obligated part changes from the Transporter to the Shipper.

SE noted that there had been discussions in the Distribution workgroup around the implementation dates for this modification and whether there should be a hard implementation or a transition period. The Chair summaries the discussions at the last Distribution workgroup meeting noting that a 12-



month transition period had been requested and that the current intention is to implement these changes in June 2020, therefore a decision would need to be made before June 2019.

The Chair noted that there were some areas of the IGT UNC that IGT119 had not picked up within its legal text analysis. The Chair noted in particular that sections E12, E13 and E20 had not been included in the modification, however, there was a reference to Class 1 meters in all of these sections. The CA resolved to send over the analysis to SE to be incorporated into the modification.

The Chair concluded that if there were no IGT specific concerns around the modification, this could proceed to a joint workgroup with the UNC.

Action MWS18/12-06: CA to send to ESPUG the legal text analysis for IGT119.

Action MWS18/12-07: CA to speak to the Joint Office around incorporating IGT119 in a joint workgroup with UNC647.

## **Withdrawn Modification Proposals**

9. IGT114 – Extending the data available to Suppliers under K24.3(I

The Chair noted that this modification was withdrawn by Scottish Power on 27<sup>th</sup> November 2018 as IGT115 had now been implemented, and therefore this modification had been superseded.

The Workgroup noted the update.

## 10. MPRN Allocation Process

RC noted that following the recent allocation of MPRNs to a new IGT the MPRN process required a review to ensure that all relevant steps were included in the guidance document. The Workgroup acknowledged that this is only a guidance document and is not codified.

RC presented an amended guidance document including an explicit step which ensures new IGT entrants have acceded to SPAA and have been through the UK Link lifecycle, therefore being allocated an MDD shortcode before an MPRN range is allocated.

The Workgroup reviewed the document and was satisfied that the amendments bolstered the process.

KD queried whether a step needed to be added to detail who the range is distributed to, as the current drafting lacked this step. RC noted the suggestion and resolved to add this to the document.

The Workgroup was happy for this guidance to be added to the website.

Action MWS18/12-08: CA to add the new MPRN process guidance document to the IGT UNC website.

#### 11. IGT UNC Known Issues Register



The Workgroup reviewed the current items recorded on the known issues register. The workgroup agreed the following changes and comments.

- MPRN range allocation could be removed once the amended process has been added to the website;
- Addition of UNC656 Two named alternates allowed for every Panel member; and
- CA to email Cher Harris (Indigo Pipelines) to ascertain whether the AQ review process is still an issue, as Indigo do not appear to have not reached out to other IGTs.

#### 12. AOB

PO gave an update to the Workgroup on the 'confirming Shipper vs Elected Shipper' reporting, this is also known as 'Gazumping'. PO noted the below statistics:

REPORTING MONTH	NO. OF OCCURRENCES	FINDINGS	
October 2018	5	Different Shippers to the original PSR Shipper	

The Workgroup noted the update.

#### Housekeeping changes

CB noted that BU-UK had found a small housekeeping change within the IGT UNC, however, this was not significant enough to raise a single modification. CB suggested that a new tab is added to the known issues register to list any housekeeping changes that are found within the IGT UNC, so these can be put into one modification when the list has reached a larger number.

The Workgroup agreed to add this to the known issues register and review this on a monthly basis.

## **MPRN** range document

RC noted that a request was sent to the IGT UNC helpdesk from a TPI who requested more information about the MPRN range spreadsheet. The email stated that they have created a system using the MPRN range to let customers know whether they would be eligible to switch suppliers who are on an IGT network. RC noted that an email had been sent back to the TPI explaining the relationship of Shippers, Suppliers and IGTs and noting that the MPRN range is by no means a tool for guaranteeing any kind of switching information as there were several steps in between this including contractual agreements. KM was alarmed by the email, however, noted that more information was needed before any meaningful action could be taken. KD mirrored these concerns however both maintained that this document should still be in the public domain.

The Workgroup resolved to defer any decisions on next steps until the TPI had replied to the initial email response and more information could be obtained by the CA.



## **Energy Code Review**

The Chair noted that Ofgem had published a term of reference for an energy Code review to be carried out by BEIS and Ofgem. The Chair noted that he will ask the Panel whether they would like to submit a response to the consultation. KM noted that in principle it may be beneficial to send an IGT response, however, noted that companies may be sending individual responses to the consultation.

The Chair resolved to take this discussion to the December Panel for discussion.

## The next IGT UNC Modification Workstream Meeting is on 8th January 2019

# Appendix 1

MWS18/09-06	4 <sup>th</sup> September 2018	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.	CA	Closed.
MWS18/11-01	6 <sup>th</sup> November 2018	CA to finalise the Workgroup report for IGT112V and add this to the November Panel for a decision on Consultation.	CA	Closed.
MWS18/11-02	6 <sup>th</sup> November 2018	CA to complete the RG004 review group report to be sent to the November Panel.	CA	Closed.
MWS18/11-03	6 <sup>th</sup> November 2018	RK to revise ancillary document and modification before the November Panel.	RK	Closed. An amended modification will be submitted in time for the December Panel.
MWS18/11-04	6 <sup>th</sup> November 2018	VP to redraft the UNC647 equivalent modification and submit to the Code Administrator for entering the modification process and inclusion on the November Panel agenda	VP	Closed.
MWS18/11-05	6 <sup>th</sup> November 2018	CA to add Confirming Shipper vs Elected Shipper reporting to the known issues	CA	Closed.



		register.		
MWS18/12-01	4 <sup>th</sup> December 2018	CA to add UNC656 and the issue of two named alternates to the known issue register.	CA	New
MWS18/12-02	4 <sup>th</sup> December 2018	PO to speak with CB (BU-UK) to look over areas of the Code to prioritise in a Switching review group.	PO	New
MWS18/12-03	4 <sup>th</sup> December 2018	CA to speak with John Welch (Npower) to ascertain whether Npower will be raising an IGT equivalent modification to UNC664.	CA	New
MWS18/12-04	4 <sup>th</sup> December 2018	CA to speak with Gazprom to ascertain whether an IGT equivalent modification needs to be raised to UNC665.	CA	New
MWS18/12-05	4 <sup>th</sup> December 2018	CA to share the IGT116V Workgroup report with the Joint Office ahead to the December Distribution Workgroup meeting to be completed on the same day.	CA	New
MWS18/12-06	4 <sup>th</sup> December 2018	CA to send to ESPUG the legal text analysis for IGT119.	CA	New
MWS18/12-07	4 <sup>th</sup> December 2018	CA to speak to the Joint Office around incorporating IGT119 in a joint workgroup with UNC647.	CA	New
MWS18/12-08	4 <sup>th</sup> December 2018	CA to add the new MPRN process guidance document to the IGT UNC website.	CA	New