

## **Changes to the IGT UNC to align with UNC changes for the REC – S Ladle 25/2/19**

NB: This note is to provide additional detail on the changes we are proposing to make to the IGT UNC and is based on the Draft Legal Text issued in February 2019

The following are areas that have been picked up whilst making the initial drafting changes to the IGT UNC to align with UNC changes made as of the 25<sup>th</sup> February 2019. They have documented in order to assist discussion at our next Review group meeting currently scheduled for the 6<sup>th</sup> March 2019.

### **A. Suggested Areas for resolution by UNC/Dentons**

#### 1. Interruptible Supply Points

Is it correct to say that we are still waiting to see the Code Changes for the handling of Interruptible Supply Points? The relevant part of the IGT UNC is currently Part CIII.

#### 2. Reducing periods for Supply Point Confirmation Re SOLR

It appears that this area is currently being discussed with Ofgem. Isn't this a REC issue, as normally the process is Supplier driven in terms of keeping the end consumer whole in the event that a Supplier goes out of business? When are we going to see the final text for this?

#### 3. Capacity Registration (Supply Point Capacity)

There is a section in the new UNC (G5.4) re Referable Registration Nominations and booked capacity. This would appear to be still under discussion with Dentons and may make its way to Section B3

### **B. Suggested Areas for resolution by CDSP/Xoserve/UNC**

#### 1. Supply Portfolios and User Data Reconciliation

The UNC text requires Users to rectify any issues found during the User Data Reconciliation process by submitting a Supply Point Confirmation. This may also include setting up a new MPRN where the site appears to be Unregistered.

- Is the use of a Supply Point Confirmation correct for IGT Supply Points which are by their nature CSS Supply Points?

Should our IGT UNC Text refer to Supply Portfolios and User Data Reconciliation rather than just Supply Portfolios as it currently does?

#### 2. Supply Point Withdrawal

The IGT UNC code relating to the current Supply Point Withdrawal process is set out in our Part CIV. The UNC sets this out in G6 (Non-CSS Supply Points). Is there still a need for the Term Supply Point

Withdrawal for CSS Supply Points or should this now be replaced by Supply Point De-Registration (under the REC)? If both withdrawal and de-registration are relevant how does this work for the Code provisions where currently if a Supply Meter Point is both Withdrawn and Isolated the exemption for Transportation Charges can be granted?

Please See Section CIV for some proposed changes re this?

### 3. Supply Point Registration – Non-CSS Supply Points

Section G6 of the UNC sets out the process to apply to Non-CSS Supply Points which are generally a copy of the current UNJC processes to Change of Shipper. Whilst this does not appear to apply to the IGT UNC (CSS Supply Points only) it appears to be the only areas where Supply Point Nomination, Offer, Confirmation etc. are set out.

However, Supply Point Confirmation etc. also appear in a few places in the UNC with an application to CSS Supply Points. Is this correct and if so, how should we reference Section G6?

### 4. Shipper-Supplier and Shipper- Transporter Association Tables

Do we need to reference these in the IGT UNC?

### 5. Shipper User verification of Supply Meter Point Isolations

This is set out in the new UNC under G7.6 (G3.9 in the current UNC). However, it is a process that the IGT UNC does not appear to currently reference. Is this an omission? Should an IGT Modification have been raised?

### 6. Re-establishment

The UNC has a whole host of cases set out for re-establishment processes. However, the current UNC only has a subset of these. I believe Mods were raised to extend the UNC processes but it appears that no equivalent IGT UNC mods were raised. What do we need to do? I have currently drafted the IGT UNC text to pick up all the new situations.

### 7. Supply Point Amendment

We have introduced this by pointing across to new UNC Section 3.5. Is this sufficient? Should we specifically reference the term Supply Point Amendment

## **C. Suggested Areas for resolution by IGTs**

### 1. Supply Point Enquiries

There is a paragraph in the current UNC (G1.16) which is replicated in the new UNC as G3.4. It deals with prospective Supply Point Nominations and Supply Point Enquires. This does not appear to be in the current IGT UNC. Is there a reason for this?

## 2. Failure to revise the Supply Point Register

There is a paragraph in the current UNC (G1.14) which is replicated in the new UNC as G3.5. It deals with payments made by the NTS where there are errors in the registration of a Supply Point by the CDSP. This does not appear to be in the current IGT UNC. Is there a reason for this? What would happen if this error applied to an IGTS Supply Point?

## 3. Site Visits

Both codes set out the process to be followed re a Site Visit where a User believes there are errors in Supply Point Register information. Is there a reason why the IGT UNC does not point to the relevant UNC area as opposed to setting out almost identical text in the IGT UNC?

## 4. New Supply Points

The process for New Supply Points as set out in Part CV of the IGT UNC. Can this be checked thoroughly to make sure the proposed text works as it should particularly regarding the links to (new) UNC G3.4.4 though G3.4.8. This should also be read in conjunction with the proposed re-wording for the Project Summary Report sections (CI9 and CI10)