

At what stage is this **Final Modification Report** document in the IGT123F: Modification Workgroup Report Housekeeping Changes **Draft Modification** 03 Report Final Modification Report **Purpose of Modification:** Following several identified housekeeping changes being added to the Known Issues Register, as utilised by the IGT UNC Modification Workstream, this change is designed to correct these in bulk and ensure the accuracy of the IGT UNC and associated ancillary documents. Panel consideration is due on 17th May 2019 The Panel recommends implementation of this self-governance modification. High Impact: None

Medium Impact:

Low Impact:

None

N/A



Contents Any questions? Contact: 3 **Summary Code Administrator** 3 Governance iGTUNC@gemse Why Change? rv.com **Code Specific Matters** 4 020 7090 1044 Solution Proposer: **Impacts & Other Considerations** 4 **Chris Barker Relevant Objectives** 4 **Implementation** 5 chris.barker@bu-Legal Text 6 uk.co.uk

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Version 1.0 20th May 2019

Timeline

10 Consultation

11 Panel Discussions

12 Recommendations

The Proposer recommends the following timetable:		
Initial consideration by Workgroup	N/A	
Amended Modification considered by Workgroup	N/A	
Workgroup Report presented to Panel	N/A	
Draft Modification Report issued for consultation	29th March 2019	
Consultation Close-out for representations	23 rd April 2019	
Variation Request presented to Panel	N/A	
Final Modification Report available for Panel	25 th April 2019	
Modification Panel decision	17 th May 2019	



1 Summary

What

This change proposal seeks to make an array of small 'housekeeping' changes to amend the IGT UNC text ensuring that it is up to date, accurate and relevant.

Why

During the administrative activities of managing a code, from multiple parties, errors can often arise which are overlooked and subsequently not captured. These don't necessarily affect the obligations and processes imposed, but rather create inconsistencies which should ideally be corrected to ensure that codes are read, and therefore interpreted, in the proper way to guarantee consistency. Examples can include a reference to a section of the UNC (Uniform Network Code) which is actually 3.4 instead of 3.3, or perhaps referring to an old piece of legislation which has since been updated and therefore the dates are wrong, but not the title of the reference used.

How

The IGT UNC Modification Workstream has incorporated a process into the 'Known Issues Register' whereby parties to the IGT UNC can freely identify and register housekeeping changes required, and the portions of legal text affected. Previously there was the potential for each small change to be its own change proposal which wasn't efficient and therefore likely made parties reluctant to raise such changes. Now with the new process this allows for multiple housekeeping changes to be actioned along with associated amendments to legal text, as addressed later on in this document. These changes have no material impact on code, or any parties affected by it.

2 Governance

Justification for Fast Track Self-Governance Procedures

This change proposal is designed to implement several housekeeping changes which have no impact on parties and therefore does not require extensive review. It is deemed that this change can follow fast track procedures. Likewise, because there is no material impact proposed from this change, it can follow a self-governance approach.

Requested Next Steps

This modification should:

- be subject to fast track self-governance
- Modification will be submitted to IGT UNC Modification Panel 15 Days prior to Panel.
- Voted as to whether it meets fast track self-governance criteria and support for implementation.
- Implemented in the next code release.



3 Why Change?

It can occur when managing a code that small errors appear. These don't necessarily affect the obligations and processes imposed, but rather create inconsistencies which are ideally corrected to ensure that codes are read, and therefore interpreted, in the proper way to guarantee consistency. Examples can include a reference to a section of the UNC (Uniform Network Code) which is actually 3.4 instead of 3.3, or perhaps referring to an old piece of legislation which has since been updated and therefore the dates are wrong, but not the title of the reference used. This change proposal is therefore designed to correct a number of these inconsistencies so that the IGT UNC can be maintained effectively as a code.

4 Code Specific Matters

Technical Skillsets

N/A

Reference Documents

- IGT UNC Version 10.9
- Pipeline Operation Standards of Service Query Management Version 2.3
- New Connections Non-Dom Version 1.0
- New Connections Domestic Version 1.2
- Known Issues Register

5 Solution

Multiple housekeeping changes have been identified requiring action by the IGT UNC Mod Workstream. These changes have no material impact on code, or any parties affected by it. A number of small changes to the main body of the IGT UNC and three of the ancillary documents will ensure the accuracy and validity of the code. These specific changes are covered in more detail within the Legal Text.

6 Impacts & Other Considerations

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

There are no foreseen impacts on the SCR, and the ongoing Consequential Changes activity, because this change proposal is having no material impact on the code. And any small references and text changes (mostly in Part C) will need to be naturally monitored as the code administrator carries out its requirement of maintaining two versions of the IGT UNC i.e. one live and another accounting for identified consequential changes from the REC and Faster Switching.

Consumer Impacts

N/A



Environmental Impacts

N/A

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	None
(B) Co-ordinated, efficient and economic operation of	None
(i) the combined pipe-line system; and/or	
(ii) the pipe-line system of one or more other relevant gas transporters	
(C) Efficient discharge of the licensee's obligations	None
(D) Securing of effective competition:	None
(i) between relevant shippers;	
(ii) between relevant suppliers; and/or	
(iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers	
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	Positive
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

Due to the nature of the proposed housekeeping changes, objective F will be better facilitated by this change proposal as the IGT UNC will be updated to ensure its accuracy which will improve the administrative efficiency behind the code.



8 Implementation

The implementation of the changes this proposal suggests should be applied to the next code release of the IGT UNC. There are no identified system change requirements or other causes which would cause a delay to these proposed changes.

9 Legal Text

Text Commentary

Both the ancillary documents, referred to in the Reference Documents section of the 'Code Specific Matters,' and the following parts of the code are to be affected by this change proposal:

- Part CV 2.7.1 (a)(iii) the IGT UNC defines Gas Year in Part M, therefore a point across to the UNC is not needed in this instance.
- Part CI 20.6 the Data Protection Act of 1998 has been replaced by a new version in 2018 following GDPR developments.
- Part G 20.1 reference to Microsoft Excel which could be deemed commercially bias. Amend to have referencing a generic spreadsheet format.
- Standards of Service Ancillary Document 3.1 (j), 5.2 and New Non-Dom & New Domestic
 Ancillary Documents the rest of the IGT UNC uses Business Day, while these clauses
 references a Working Day. Correct to conform with the rest of the code.
- Standards of Service Ancillary Document 3.1 (f) reference to a template which should ideally point to 6.2 within the ancillary document.
- Part CI 2.3, 5.2, Part CIV 8.1 and Part D 2.1 a capitalised term has four references in code but
 no definition within Part M. Therefore, a similar approach is recommended for how the UNC
 rationalises the definition of "Isolate."

The following text extracts show the suggested amendments/deletions and inclusions to be made to update the IGT UNC.

Suggested Text

Part CV 2.7.1 (a)(iii)

(iii) where the Proposed Supply Point is an NDM Supply Point, the Pipeline User shall provide to the CDSP the Pipeline User's estimate of the value of any variable by reference to which any relevant End User Category is in the relevant Gas Year-defined in accordance with Section H of the UNC;

Part CI 20.6

20.6 For the purposes of Clause 20.3, the Last Resort User shall execute all such documents, deeds and assignments and perform such acts as the Pipeline Operator may reasonably require, including without limitation, executing any relevant documents, deeds and assignments or perform such acts necessary to ensure compliance with the provisions of the Data Protection Act 49982018.



20.1 The Pipeline Operators shall provide a Portfolio Extract to each Pipeline User by the fifth Business Day of each month with details of Supply Meter Points as of the first Business day of that month. The Portfolio Extract shall be issued in either comma separated value or Microsoft Excel spreadsheet format.

Standards of Service Ancillary Document

3.1 (i)

The start time will be the working dayBusiness Day on which the query was received with a cut off time of 16:00 hours unless this is a <u>non business dayBusiness Day</u>, in which case, it will be the immediate following <u>business dayBusiness Day</u>.

5.2

The table below summarises the escalation procedure that should be taken when resolving any Pipeline Operator Queries. All timings referred to in this table are Workings Days Business Days.

New Non-Dom Ancillary Document

2.1.1

The IGT will send the PS1 to the Shipper at the earliest opportunity and will endeavour to send no later than 30 working days Business Days prior to the installation of the initial meter fit.

2.1.2

The IGT should endeavour to investigate/resolve and resubmit the PS1 within 15 working days Business Days, noting that any resubmission needs to comply with the sequential numbering to avoid further rejections.

New Domestic Ancillary Document

2.1.1

The iGT will endeavour to investigate/resolve and resubmit the PSR within 15 working days Business Days, noting that any resubmission needs to comply with the PSR Reference numbering to avoid further rejections.



The iGT will endeavour to investigate/resolve and resubmit the PSR within 15 working days Business Days, noting that any resubmission needs to comply with the PSR Reference numbering to avoid further rejections.

Standards of Service Ancillary Document 3.1 (f)

f) Measurement within the SoS will only apply to those queries issued to a Pipeline Operator using the agreed mechanism. This template, <u>provided in 6.2</u>, will be submitted electronically via email, or other agreed method. As a contingency fax may be used.

Part M

"Isolated" shall be construed accordingly in relation to "Isolation";

"Isolation" shall have the meaning ascribed thereto in the UNC;

Version 1.0

20th May 2019



10 Consultation

Panel invited representations from interested parties with the Consultation closing on 23rd April 2019. One representation was received from BUUK following a full 15-day consultation period.

Representations were received from the following parties:			
Organisation	Response	Relevant Objectives	Key Points
BUUK	Support	F - positive	 We support the implementation of this change proposal because it will ensure that the IGT UNC is updated and thereby ensure the accuracy of the obligations under code. It is agreed that the change should go through a fast track self-governance process. There are no impacts or costs foreseen worth of note. It is agreed to have the implementation date should be part of the next release. The proposed legal text is deemed sufficient to achieve the purpose of the modification.

11 Panel Discussions

Discussion

The Chair indicated this modification would help to correct some small errors in the IGT UNC which would help keep the code aligned to the UNC more efficiently. The Chair indicated that one response had been received from a Pipeline Operator which supported the implementation of this modification.

Consideration of the Relevant Objectives

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

Determinations

The vote was carried out with two Pipeline Operators and three Pipeline Users. The Panel agreed by unanimous vote that the Modification should be implemented. All Panel members agreed that this Modification should be implemented in the June release. This modification is subject to a 15-day appeal window as per the Self-Governance process.



12 Recommendations

Panel Determination Self-Governance

Members agreed:

• that Modification 123F should be implemented