

### **Final Modification Report**

At what stage is this document in the process?

# **IGT126F**:

# Alignment between the IGT UNC and UNC for Unregistered New Supply Meter Points



### **Purpose of Modification:**

The intent of this change proposal is to update the code to ensure that obligations are effectively captured, where there is reference to the UNC (Uniform Network Code). This activity being focused on areas which have been identified as part of RG005.



Panel consideration is due on 21st June 2019

The Panel recommends implementation of this self-governance modification.



High Impact:

N/A



Medium Impact:

N/A



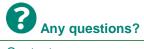
Low Impact:

N/A



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Contact:

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**Code Administrator** 





Proposer:
Chris Barker





# Timeline

| 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 | 1 <sup>st</sup> May 2019  |  |  |  |
| Consultation Close-out for representations        | 22 <sup>nd</sup> May 2019 |  |  |  |
| Variation Request presented to Panel              | N/A                       |  |  |  |
| Final Modification Report available for Panel     | 30 <sup>th</sup> May 2019 |  |  |  |
| Modification Panel decision                       | 21st June 2019            |  |  |  |



### 1 Summary

### What

During the review group RG005, and the review of the current IGT UNC drafting, it was identified that the IGT UNC does not effectively point across to the UNC.

The code does not presently account for provisions under the UNC around 'Unregistered New Supply Meter Points.' These activities and processes are already in place to be actioned and as such the governance needs to be updated to reflect this reality.

### Why

The present misalignment between the IGT UNC and the UNC could potentially cause confusion and misinterpretation of the obligations. This change is therefore designed to update and correct this misalignment.

#### How

In line with similar such mirror references, a new clause is to be placed within Part CI of the IGT UNC. The proposed legal text accounts for the requirements of this alignment while also tidying up existing clauses which are 'Not Used.'

### 2 Governance

### **Justification for Fast Track Self-Governance Procedures**

This change proposal is designed to implement a specific kind housekeeping change, whereby the IGT UNC is aligned effectively with the UNC. This will have no foreseen impact on parties and therefore does not require extensive review. It is therefore 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

# 3 Why Change?

The present misalignment between the IGT UNC and the UNC could potentially cause confusion and misinterpretation of the obligations. To ensure that the code is applied effectively updates are required.



# 4 Code Specific Matters

### **Technical Skillsets**

N/A

### **Reference Documents**

IGT UNC - Version 10.9

### 5 Solution

An existing clause within Part CI of the IGT UNC which is 'Not Used,' is to be replaced with the new clause around 'Unregistered New Supply Meter Points' which is to point to the UNC, and in particular Section G2.11 of the TPD. This will ensure that the same processes and provisions apply within both codes.

# 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. The reference and text changes will need to be 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 change, 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 this proposal 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 amendments to code.



# 9 Legal Text

### **Text Commentary**

The below text is the proposed amendments to Part CI of the IGT UNC, version 10.9. The clauses in question being 18 and 19. The new conditions in red are to cover off obligations which are within the UNC but have not been previously captured for the IGT UNC.

### **Suggested Text**

### Part CI

- 18 Effect of Confirmation: New Supply Point Unregistered New Supply Meter Points

  18.1 NOT USEDFor the purposes of this Clause 18 the provisions of Section G2.11 of the UNC shall apply with the following changes:

  the words "and Energy Balancing Charges" shall be deleted from paragraph 2.11.5(c) paragraph 2.11.5(d) shall not apply
- 19 Supply Point Confirmations Withdrawing User NOT USED
  NOT USED.



# 10 Consultation

Panel invited representations from interested parties with the Consultation closing on 22<sup>nd</sup> May 2019. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

| Organisation | Pasparas                  | Relevant     | Key Points   |
|--------------|---------------------------|--------------|--|
| Organisation | Response                  | Objectives   | Key Points   |
|              | Support<br>Implementation | F - positive | <ul> <li>We support the implementation of this change<br/>proposal because it will ensure that the IGT<br/>UNC is updated and thereby ensure the<br/>accuracy of the obligations under code,<br/>covering off areas of development under the<br/>UNC which have been previously overlooked.</li> </ul> |
|              |                           |              | <ul> <li>It is agreed that the change should go through<br/>a fast track self-governance process.</li> </ul>   |
|              |                           |              | <ul> <li>There are no impacts or costs foreseen by<br/>this change.</li> </ul>   |
|              |                           |              | <ul> <li>It is agreed to have the implementation date<br/>should be part of the next release.</li> </ul>   |
|              |                           |              | <ul> <li>Following the discussion with RG005 and the<br/>Code Administrator, we feel that the proposed<br/>legal text is sufficient for the purposes of the<br/>modification.</li> </ul>   |
|              | Support<br>Implementation | F- Positive  | We support the implementation of this modification as it seeks to align the IGT UNC to the UNC in an appropriate manner and in the process of doing so, removes the possibility of potential misinterpretation of the code and its conditions.   |
|              |                           |              | <ul> <li>It is agreed that the change should go through<br/>the self-governance process.</li> </ul>  |
|              |                           |              | <ul> <li>We believe the implementation of this<br/>modification would positively impact Objective<br/>F in promoting the efficiency of the code.</li> </ul>  |
|              |                           |              | <ul> <li>We would support the implementation of this<br/>modification for the nearest scheduled code<br/>release.</li> </ul>   |
|              |                           |              | We are satisfied that the legal text will deliver<br>the intent of the modification.   |



| E.ON | Support<br>Implementation | F- Positive | We support the implementation of this change<br>as it is removing the misalignments<br>surrounding Unregistered New Supply Meter<br>Points between the UNC and the IGT UNC. |
|------|---------------------------|-------------|---|
|      |                           |             | <ul> <li>It is agreed that this change should go<br/>through self-governance process.</li> </ul>  |
|      |                           |             | <ul> <li>We agree with the proposed relevant<br/>objectives.</li> </ul>   |
|      |                           |             | We don't believe there will be an impact to us<br>for the implementation of this modification.  |
|      |                           |             | We support the June 2019 release for implementation.  |
|      |                           |             | We are satisfied with the proposed amendments to the legal text.  |
|      |                           |             |   |

### In Summary:

- Three responses were received to the consultation for IGT126F, incorporating two responses from Pipeline Users and one Pipeline Operator.
- All three respondents offered support for this modification.
- All respondents agreed that the Modification meets the criteria for Self-Governance.
- All respondents agreed that the Legal Text supported the requirements of the solution.
- All three respondents agreed that this change should be implemented in the next release.
- All three respondents agreed with the proposed relevant objectives.

### 11 Panel Discussions

### **Discussion**

The Chair indicated that this modification aims to ensure alignment between the UNC and IGT UNC on a process that is already occurring. The Chair summarised the responses noting that three responses were received, all of which provided full support for 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 Fast-Track Self-Governance modifications.

### **Determinations**

The vote was carried out with three Pipeline Operators and two Pipeline Users. The Panel agreed by unanimous vote that this Modification should be implemented. All Panel members agreed that this Modification should be implemented in the November 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 126F should be implemented in the November 2019 release subject to the appeal procedures.