










IGT UNC Request Workgroup Report	At what stage is this document in the process?
<h1>RG005:</h1> <h2>IGT UNC Review of Consequential Changes resulting from Faster Switching arrangements</h2>	<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p><b>Purpose of Request:</b></p> <p>This Proposal seeks to undertake a review of the IGT UNC with the aim of identifying Consequential Changes required as a result of development of the REC.</p>	
	<p>The Panel will consider this Workgroup Report on 21<sup>st</sup> June 2019. The Panel will consider the recommendations and determine the appropriate next steps.</p>
	<p>High Impact: Pipeline Users, Pipeline Operators</p>
	<p>Medium Impact: N/A</p>
	<p>Low Impact: N/A</p>

Contents		 Any questions?
1	Request Summary	3
2	Impacts and Costs	3
3	Terms of Reference	6
4	Modification(s)	7
5	Recommendation	7
About this document:		Contact: <b>Code Administrator</b>
<p>This document is a Workgroup report which recommends that Review Group 005 has now completed its requested action. This will be presented to the Panel on 21<sup>st</sup> June 2019.</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>		 <a href="mailto:iGTUNC@Gemserv.com">iGTUNC@Gemserv.com</a>
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# 1 Request Summary

## Why is the Request being made?

With Ofgem directing the various Industry Codes to review for any consequential changes and impacts to their current state with the development of the REC (Retail Energy Code), the IGT UNC requires a Review Group to assess these potential impacts.

The Review Group will aim to produce a report that will identify the areas of the IGT UNC which are impacted with the introduction of the REC and thus will need to consider the following:

- Areas to transition into the REC, either on their own or alongside UNC obligations;
- Areas to remain in the IGT UNC but require updating as a result;
- Areas of the IGT UNC remaining, but with similar topics transferring away from the UNC. I.e. unique obligations within the IGT UNC which are required to remain so; and
- References between the IGT UNC and UNC codes which may be displaced due to obligations transferring to the REC.

The Review Group would need to be conscious of other codes equivalent consequential change reviews in assessing the areas of impact on the IGT UNC, particularly that of the UNC.

## 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 the areas of transition into the REC. It will be important to consider and assess the areas which will need to remain unique and separate from the UNC's own approach to consequential changes. For example, the IGT bulk registration process, IGT invoicing and, potentially, metering provision.

## Impacts & Costs

No direct impacts or costs are envisaged as a result of the proposed work for this review group, but there are likely to be impacts which coincide with the release of the REC and as Ofgem's SCR (Significant Code Review) concludes, and the resulting modification/s required to alter the current governance and administrative arrangements.

## Recommendations

The objective of this request is to produce a recommendation to the IGT UNC Modification Panel whereby the proposal should be referred to a Workgroup as this will enable a thorough and collaborative review of the code and consequential impacts to it as a result of Faster Switching and the introduction of the REC.

## Additional Information

The Review Group will need to consider consequential changes occurring under the UNC and where the two codes can possibly be made to align into the REC. Therefore, while the group will be kept separate from the UNC's similar workgroup, there will be a requirement for updates and dialogue regarding the two codes. Parties should be mindful that consequential changes to the IGT UNC may require a legal view. The group will also need to remain mindful of other consequential change developments, and the timescales associated with them, such as;

- 08/01/19 – IGT UNC Mod Workstream and initial kick off with considerations of key areas to cover

- Mid-January – BUUK and other IGT, and Gemserv representatives to carry out a page turn exercise of the IGT UNC to assess areas of consequential change
- Mid to Late January - High level UNC changes to be shared with IGTs
- End of January/Early February - UNC Legal Text draft from Consequential Changes provided to IGT UNC
- 05/02/19 – IGT UNC Mod Workstream with BUUK and Gemserv to present initial findings to the group for discussion
- Mid-February – BUUK and other IGT and Gemserv representatives to continue with a page turn exercise of the IGT UNC (if second workshop required)
- 18/02/19 – Code representatives to present consequential changes to RDUG, with full requirements of delivery to be clarified by Ofgem (Jon Dixon)
- 02/03/19 – IGT UNC Mod Workstream with group to collate views to be presented at the next Panel meeting
- 06/03/19 – BUUK, IGTs, Xoserve and Gemserv representatives continued the page turn at this second RG005 Subgroup.
- 18/03/19 – BUUK, IGTs, Xoserve and Gemserv representatives continued the page turn at this third RG005 Subgroup.
- 25/03/19 – Code representatives to present legal text of proposed changes to RDUG
- End of March – All wrapped up and with final report, changes and legal text to Ofgem

## Work Group Update

The above programme is as per that set out in the Review Group Request. As the work was progressed, it was clear that the original deadline of the end of March would not be met. The main reason for this was that there were delays in the delivery of the UNC changes with the final UNC version not being delivered until the 4<sup>th</sup> June 2019. As this was after the second deadline date set by Ofgem, the actual changes made to the IGT UNC were based on a version of the UNC delivered on the 25<sup>th</sup> April 2019.

In addition to the above schedule the following meetings were also completed.

- 16/04/19 - Code representative attended UNC workstream meeting at Dentons at which the changes to the IGT UNC were presented to Shippers alongside the UNC changes
- 14/05/2019 - RG005 teleconference held to have a final sign off before documentation sent to Ofgem.
- 23/05/2019 – Final documentation in regards to 10.9REC version of the IGT UNC and supplementary document which highlights the changes made sent to Ofgem.

Subsequent to this a couple of very minor changes have been identified against the last UNC version and the Code Administrator is consulting with Ofgem on how they wish these changes to be managed

## 2 Impacts and Costs

### Consideration of Wider Industry Impacts

Workgroup note – some of the Impacts have been updated based on the work carried out to identify changes required to the IGT UNC

## Impacts

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

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> <li>Extensive changes to systems and processes to reflect the move of Registration from the IGT UNC/UNC to the REC</li> </ul>
Development, capital and operating costs	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Contractual risks	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> <li>IGT UNC obligations may be updated or moved into the REC</li> </ul>

Impact on Transporters	
Area of IGT business	Potential impact
System operation	<ul style="list-style-type: none"> <li>Some system changes likely</li> </ul>
Development, capital and operating costs	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Recovery of costs	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Price regulation	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Contractual risks	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> <li>IGT UNC obligations may be updated or moved into the REC</li> </ul>
Standards of service	<ul style="list-style-type: none"> <li>n/a</li> </ul>

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	<ul style="list-style-type: none"> <li>n/a</li> </ul>
IGT UNC Panel	<ul style="list-style-type: none"> <li>n/a</li> </ul>
General administration	<ul style="list-style-type: none"> <li>Less administration long term due to reduced code size</li> <li>More administration short term to maintain the shadow copy of the REC version of the IGT UNC</li> </ul>

#### Impact on Code

Code section	Potential impact
All sections	<ul style="list-style-type: none"> <li>Some clauses, or entire sections, may be recommended for transition into the REC, either directly or as ancillary documents. With other areas possibly requiring updating</li> </ul>

#### 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"> <li>Documentation update/move into the REC</li> </ul>
IGT Network Codes	<ul style="list-style-type: none"> <li>Documentation update</li> </ul>

#### Other Impacts

Item impacted	Potential impact
Security of Supply	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Operation of the Total System	<ul style="list-style-type: none"> <li>n/a</li> </ul>
Industry fragmentation	<ul style="list-style-type: none"> <li>Separation/change of obligations as conditions moved or updated between Industry Codes</li> </ul>

## 3 Terms of Reference

### Background

As outlined above, it is proposed to conduct a review of the IGT UNC and how consequential changes will impact the code with the development of the REC.

### Topics for Discussion

- Understanding the objective, which is not to change the intent of code areas, but rather understand and act on consequential changes from Faster Switching and REC
- Assessment of alternative means to achieve objective such as areas not to be transferred to the REC but potentially updated
- Assessment of potential impacts of the request
- Benefit of alignment with UNC and assessment of legal text.

## Outputs

Produce a Workgroup Report for submission to the Modification Panel, containing the assessment and recommendations of the Workgroup.

## 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 Modification(s)

### Potential Modifications needed

The Workgroup agreed that there were no specific further modifications to be raised as a result of this Review group. The Legal Text developed during the Sub Group work is set out in Appendix 1. There is a summary document (also in Appendix 1) which describes the various changes that have been made. At this time it is not known exactly how the Legal Text changes will be implemented but it is expected that this will be via the Significant Code Review process under direction from the Authority.

There have been some Fast Track Modifications already raised as a result of the work carried out within this Review group where some inconsistencies with the UNC were identified as a result of the intensive comparison work carried out between the IGT UNC and the UNC (IGT123F, IGT125F and IGT126F). A further area was identified in connection with Shipper User Verification of Meter Point Isolations. However, no modification has been raised for this as the Sub Group believed it first required a change to the UNC.

## 5 Recommendation

### Workgroup's Recommendation to Panel

The Workgroup asks Panel to:

- Recommend that RG005 remains open and sits as a standing Workstream meeting agenda item until otherwise further stated;
- Recommend that a REC tab is added to the Known Issues Register to ensure all changes are captured and not lost in transition.
- Recommend that the process for which the Text is maintained between the different REC implementation stages is determined in line with any recommendations from the Authority.

## 6 Appendix 1

Below is a list of relevant documents produced by the Review group:

- [IGT UNC Consequential Changes – Summary Document](#)
- [IGT 10.9 REC Version of the IGT UNC – 21052019](#)