

## IGT UNC Modification Workstream Meeting 19-08

### Final Minutes

**Tuesday 6th August 2019**

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee	Organisation	
Anne Jackson (AJ)	Gemserv	Chair
Chris Barker (CB)	BUUK	
Jenny Rawlinson (JR)	BUUK	
Brandon Rodrigues (BR)*	ES Pipelines	
Cher Harris (CH)*	Indigo Pipelines	
Kate Mulvany (KM)	Centrica	
Kirsty Dudley (KD)	E.ON	
Radhika Kalra (RK)*	E.ON	Item 8 only
Mark Jones (MJ)*	SSE	
Megan Coventry (MC)*	SSE	
Billy Howitt (BH)	Gemserv	Secretariat

\*Attendees joined meeting via teleconference

#### 1. Welcome and apologies for absence

The Chair welcomed attendees to the meeting of the IGT UNC Modification Workstream. Apologies were received from Victoria Parker from ESP.

#### 2. Confirmation of Agenda

The Chair confirmed the items for discussion as outlined in the final agenda. The Workstream did not have any other business to highlight at this time.

#### 3. Approval of the Previous Minutes

Attendees reviewed the minutes from the Modification Workstream meeting held on 2<sup>nd</sup> July 2019 (19-07). BH indicated that comments had been received from BUUK in regards to items 2,5,7 and 11. BH stated that the amendments would be reflected in the final minutes. The Chair indicated that subject to these amendments the minutes from the previous Workstream Meeting (2<sup>nd</sup> July 2019) 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 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
700		Enabling large scale utilisation of Class 3	The workgroup was informed that based on a preliminary assessment an equivalent IGT modification is not necessary however this will be dependent on the UNC legal text. <b>The workgroup resolved to monitor this modification.</b>
699		Incentivise Key Areas of Performance using additional UIG Charges	The workgroup was informed that a corresponding IGT UNC modification would be required to allow these incentivised charges to be raised against IGT shippers. <b>The workgroup resolved to monitor this modification.</b>
697		Further Realising the Benefit of the Data Permissions Matrix and UNC Consistency Review	BH informed the Workgroup that the modification proposal for UNC697 stated that it should be assessed by a UNC/IGTUNC workgroup. The workgroup was also informed that the equivalent changes are likely to impact the IGT UNC thus a modification is likely to be needed. CB considering this. <b>The workgroup resolved to monitor this modification.</b>
696		Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs	The Workgroup was informed that the Business Rules for this modification were discussed at UNC696 Workgroup and that the legal text would be ready for the August UNC Panel. An alternative Mod has been raised and this references IGT supplies and may therefore impact. <b>The workgroup resolved to monitor this modification.</b>
695		Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers	The Workgroup was informed the BUUK had raised an IGT modification (IGT129). <b>The workgroup resolved to monitor this modification.</b>
694	R	CDSP provision of Class 1 Read service	The Workgroup was informed that Xoserve were in discussions with the DMSPs in regards to novating the contract. An IGT mod will be needed and BR indicated he would do this. <b>The workgroup resolved to monitor this modification.</b>
693	R	Treatment of kWh error arising from statutory volume-energy conversion	<b>The Workgroup resolved to monitor this modification.</b>
691		CDSP to convert Class 3 or 4 meter points to Class 1 when G1.6.15 criteria are met	The Workgroup was informed that UNC691 had been amended to include Class 2. BH indicated that at the UNC91 Workgroup KD had enquired to see if the impacts on the IGTs had been considered and suggested that Xoserve should have a discussion with CACOP in regards to confirming the legal implications. <b>The Workgroup resolved to monitor this modification.</b>
690		Reduce qualifying period for Class 1	The Workgroup was informed that during the UNC690

			Workgroup this modification had undergone a small amendment whereby the modification now included Class 2. <b>The Workgroup resolved to monitor this modification.</b>
682		Market Participant MDD Migration to UNC Governance from the SPAA	The Workgroup was informed that IGT124 had been implemented by Panel and had been submitted to the Authority. <b>The Workgroup resolved to continue to monitor this modification.</b>
681		Improvements to the quality of the Conversion Factor values held on the Supply Point Register	The Workgroup was informed that UNC681 was implemented by Panel on 18 <sup>th</sup> July 2019. <b>The Workgroup resolved to remove this modification from the tracker.</b>
680	S	UNC changes as a Consequence of 'no deal' United Kingdom Exit from the EU	The Workgroup was informed that IGT120F was deferred until further notice. <b>The Workgroup resolved to continue to monitor this modification.</b>
677	R	Shipper Supplier Theft Reporting Request	<b>The Workgroup resolved to continue to monitor this modification.</b>
676	R	Review of Gas Transporter Joint Office Arrangements	BH informed that during UNC676R workgroup Penny Garner had provided an overview of the Joint Office's costings between 2013-2019. BH highlighted parties have asked the JO to produce an annual report indicating costing of which the JO was going to research. BH stated that the UNC676R members have requested an extension to December 2019. <b>The Workgroup resolved to monitor the review group.</b>
674		Performance Assurance Techniques and Controls	AJ informed workgroup members that the performance controls involved within UNC674 will apply to GTs and IGTs. KD indicated that a joint workgroup needs to be decided quickly as it is likely to delay the modification if it is not. <b>The Workgroup resolved to monitor the review group</b>
672		Incentivise Product Class 4 Read Performance	BH stated that KD had indicated that this modification covered IGT supply points and therefore a discussion with CACOP should occur to ensure that all legal complexities are covered and aligned. <b>The Workgroup resolved to monitor the review group</b>
664		Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4	The workgroup was informed that during the UNC664 workgroup Mark Jones explained that the business rules for this modification were still being amended and these would be brought to the August workgroup. MJ is still assessing whether an IGT modification will be required <b>The Workgroup resolved to monitor the review group</b>

Workgroup members identified that the CDSP had not been attending the IGT UNC workgroup meetings for a number of months and it was deemed that their contribution would have been beneficial. This was particularly in relation to UNC700 whereby workgroup members believed that an IGT equivalent should be drafted by the CDSP.

**Action MWS19/08-01: Code Administrator to speak to the CDSP about sending a representative to future IGT UNC Workstream meetings.**

## 6. Review Groups

[RG005 – IGT UNC Review of Consequential Changes resulting from Faster Switching arrangements](#)

The Chair informed workgroup members that the Code Administrator had drafted an IGT UNC response to the REC consultation. The Chair highlighted that a high level outline of the draft response was presented to Panel for comments and since this meeting, the Code Administrator has drafted the response to reflect these comments. The workgroup worked through the response making small amendments. The Workgroup indicated that they wanted to include the fact that parties would also be replying to the consultation on an individual basis and that some of the views shared from the IGT UNC response might not be the same. The Workgroup also highlighted concerns surrounding the lead time of submitting modification proposals to the Authority and the time it would take for a decision to be made. The Workgroup decided to add a section in regards to this whereby the concerns are highlighted and proposed mitigation of the issue is identified. The Chair indicated that the finalised draft response amendments would be circulated to parties for the August Panel.

The Chair highlighted that during an internal exercise a small number of cross referencing errors have been identified. The Chair stated that a paper will be presented to the August Panel identifying these errors and if ratified they will be sent to the Authority. The workgroup discussed whether or not to keep RG005 open and after some discussion, it was concluded that members wanted to keep it open.

**Action MWS19/08-02: Code Administrator to send out finalised draft of the IGT UNC REC consultation response to workgroup members for review**

**Action MWS19/08-03: Code Administrator to provide the August Panel with a list of cross-referencing errors**

## 7. Review Groups

### [RG006 – Review of metering arrangements in the IGT UNC](#)

The Proposer opened up the review group by highlighting that she intended to close this group due to the impasse that was reached at the previous meeting. The workgroup questioned the template for the review group report whereby they indicated confusion on what information was the Proposer's and the dialogue that made up the workgroup update. BH indicated that he would amend the template accordingly to ensure it was clear what was the Proposer's information and what was the workgroup update. The Chair then led the workgroup through the terms of reference for RG006.

The Chair indicated the first part of the terms of reference was 1a 'Do IGTs and Shippers believe that the IGT UNC should contain metering obligations'. Both IGTs and Shippers agreed that there needed to be backstop metering provisions if there are no commercial agreements in place as an alternative. Contrary to the draft workgroup report, the IGTs indicated that they were not happy for the removal of metering obligations from Code and wanted them to remain. Workgroup members were satisfied with the workgroup updates for 1b,1c, and 2a.

The workgroup did, however, have comments surrounding 2b/2c. The Proposer indicated that as a review group progress could not be made due to the differing views. JR indicated that this area has sensitive and bespoke information and that the workgroup should be mindful of competition law. The Proposer informed the workgroup that the review group intent was to improve transparency, however as the group could not resolve the impasse the the review group should be closed. Workgroup members asked the Code Administrator to add the metering charging attributes analysis to the appendix of the review group report. Contrary to the draft workgroup report, Shippers indicated that IGT metering tariffs were not requested or discussed at any point during RG006 discussions and asked for this to be removed. Both the IGTs and Shippers wanted to provide some additional clarity surrounding their view points in regards to 2b/2c thus following was added to the review group report:

The IGTs believed that they had addressed the Proposer's points by providing clarification around User provisions. The IGTs indicated that some IGTs had completed an activity to consider the consistency across Metering Charging Statements, although consistency has not been required through any modification being raised.

The Shippers confirmed that the attributes of the Metering Charging Statements are base provisions. The Shippers were unable to discuss inconsistencies due to the IGTs deeming the information of a commercial nature thus an impasse was reached. The Shippers stated that Metering Charging Statement should be consistent but agreed that this is not mandated through any modifications being raised.

The workgroup agreed to make some very minor amendments to sections 3a,3b,3c, and 4a. The Chair asked workgroup members about the next steps for this review group. The Proposer indicated that if there were any concerns raised then another review group would be required, however if there

are only minor amendments then she would be happy for the review group to be closed. The workgroup supported and agreed with this outcome.

**Action MWS19/08-04: Code Administrator to make amendments to the RG006 review group report and send this out to review group members for review.**

## 8. Review Groups

### [RG007- Secure measures of sending electronic communication and password protection](#)

The Proposer, RK, provided the workgroup with a brief overview of the intention of the review group and how it expands upon the work through IGT118 (Amendments to the IGT UNC Password Protection Protocols) which was implemented in the June 2019 release. The Proposer highlighted to the workgroup that she had drafted a modification proposal based on the feedback from the July review group and any additional feedback to her from the current meeting. The Proposer indicated that the draft modification proposal solution states that any MPR level data should be encrypted. The Proposer and KD stated that the intention of the review group and modification is to mandate a standard approach. BR stated that encrypting MPR level data is likely to increase processing times for organisations. KD indicated that it is important that a standard approach is mandated to highlight that the IGT UNC is protecting data. Workgroup members agreed that it is important to protect data to and from pipeline operators/users. The Proposer and KD indicated that a modification would be submitted to the Code Administrator for review at the August Panel.

The Chair wanted to ascertain from workgroup members when this review group should be closed now that a draft modification proposal had been developed. KD stated she wanted to see the Panel's opinion in regards to the modification proposal before closing the review group. The Chair stated that she was unsure if the objectives of the review group had been met.

**Action MWS19/08-05: RK and KD to submit a modification proposal for review at the August Panel**

## 9. Modification Workgroups

### [IGT129 – Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers](#)

The Proposer indicated that the UNC suggested text for UNC695 (Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers) has one option whereas for IGT129 (Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers) there were an additional two options. Shippers indicated that keeping this change as closely aligned to the UNC would be the best approach. KD indicated that it is difficult to review this modification with three options. CB indicated the process is not that clear in UNC695 so it might be beneficial to speak to the proposer of UNC695 look at other proposed options.

**Action MWS19/08-06: Code Administrator and BUUK to speak to UNC695 proposer about other proposed options.**

**10. IGT UNC Known Issues Register**

The Workgroup reviewed the current items recorded on the known issues register. The Workgroup agreed with that no changes were needed.

**10. AOB**

**Kate Mulvany Resignation**

Workgroup members thanked Kate Mulvany for her input over the years and wished her the best of luck in her new role.

**The next IGT UNC Modification Workstream Meeting is on 3<sup>rd</sup> September 2019**

**Appendix 1**

MWS19/05-01	7 <sup>th</sup> May 2019	CA to review the RG004 outputs and speak to the UNC directly in regards to UNC676. <b><i>The Code Administrator is still working on the action thus it remains open.</i></b>	CA	Open
MWS19/07-01	2 <sup>nd</sup> July 2019	Code Administrator to draft an IGT UNC response to the REC consultation for July's Panel. <b><i>The Code Administrator has produced a draft IGT UNC response to the REC consultation for July's Panel thus action is closed.</i></b>	CA	Closed
MWS19/07-02	2 <sup>nd</sup> July 2019	Code Administrator and KD to draft the review group report (RG006). <b><i>The Code Administrator and KD have drafted a review group report for RG006 thus this action is now closed.</i></b>	CA & KD	Closed
MWS19/07-03	2 <sup>nd</sup> July 2019	KD to review internally the area of the Modification referencing "Multiple jobs". <b><i>KD has internally reviewed the area of the modification referencing 'Multiple jobs' thus this action is now closed.</i></b>	KD	Closed



MWS19/07-04	2 <sup>nd</sup> July 2019	VP, JR and CB to review MAMCoP and other documentation in relation to 'housings' and feedback to KD by Friday 5 <sup>th</sup> July 2019. <b><i>This review has been completed thus this action is now closed.</i></b>	VP, JR and CB	Closed
MWS19/07-05	2 <sup>nd</sup> July 2019	Parties to review definitions and internal practices on protected information to feed into August Workgroup meeting. <b><i>Parties have reviewed definitions and internal practices on protected information, and this was covered in Agenda Item 8.</i></b>	All	Closed
MWS19/07-06	2 <sup>nd</sup> July 2019	RK to take away all suggestions from the review group to help form a modification. <b><i>RK presented a draft modification proposal to the workgroup thus this action is closed.</i></b>	RK	Closed
MWS19/07-07	2 <sup>nd</sup> July 2019	Code Administrator to add Draft IGT Average NExA AQ Values Table 2019 to July Panel Agenda. <b><i>The Code Administrator added the Draft IGT Average AQ Values Table 2019 to the July Panel of which it was ratified thus this action is closed.</i></b>	CA	Closed
MWS19/07-08	2 <sup>nd</sup> July 2019	Code Administrator to remove SPAA MDD references to the Known Issues Register. <b><i>This action was completed.</i></b>	CA	Closed
MWS19/07-09	2 <sup>nd</sup> July 2019	BU-UK to find out about Shipper User Verifications of Supply Meter Point Isolations from the CDSP. <b><i>BU-UK provided an update and thus this action is now closed.</i></b>	BU-UK	Closed
MWS19/07-10	2 <sup>nd</sup> July 2019	Code Administrator to speak to internal compliance team in regards to creating an IGT shipper contact list. <b><i>The Code Administrator indicated that this action had been completed.</i></b>	CA	Closed



MWS19/07-11	2 <sup>nd</sup> July 2019	IGTs to provide the Code Administrator with a list of Shippers on their networks. <b><i>The Code Administrator indicated that only one IGT had provided this list thus it was decided that this action would remain open.</i></b>	IGTs	Open
MWS19/07-12	2 <sup>nd</sup> July 2019	Code Administrator to send out communications to the JO in regards to obtaining shipper contact details for IGTs. <b><i>The Code Administrator indicated that once a list of Shippers had been finalised then this action would be fulfilled so it was decided that this action would remain open.</i></b>	CA	Open
MWS19/08-01	6 <sup>th</sup> August 2019	Code Administrator to speak to the CDSP about sending a representative to future IGT UNC Workstream meetings.	CA	New
MWS19/08-02	6 <sup>th</sup> August 2019	Code Administrator to send out finalised draft of the IGT UNC REC consultation response to workgroup members for review.	CA	New
MWS19/08-03	6 <sup>th</sup> August 2019	Code Administrator to provide the August Panel with a list of cross-referencing errors.	CA	New
MWS19/08-04	6 <sup>th</sup> August 2019	Code Administrator to make amendments to the RG006 review group report and send this out to review group members for review.	CA	New
MWS19/08-05	6 <sup>th</sup> August 2019	RK and KD to submit a modification proposal for review at the August Panel.	RK and KD	New
MWS19/08-06	6 <sup>th</sup> August 2019	Code Administrator and BUUK to speak to UNC695 proposer about other proposed options.	CA and BUUK	New