

IGT UNC Modification Workstream Meeting 19-10

Draft Minutes

Tuesday 1st October 2019

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee		Organisation	
Anne Jackson	(AJ)	Gemserv	Chair
Chris Barker	(CB)	BUUK	
Brandon Rodrigues	(BR)*	ES Pipelines	
Cher Harris	(CH)*	Indigo Pipelines	
Claire Roberts	(CR)*	Scottish Power	Absent for Items 10 & 11
Radhika Kalra	(RK)*	E.ON	Item 5 only
Louise Hellyer	(LH)*	Total Gas and Power	Item 7 only
Ellie Rogers	(ER)*	Xoserve	
Ben Madden	(BM)*	Gemserv	Item 9 only
Billy Howitt	(BH)	Gemserv	Secretariat

^{*}Attendees joined meeting via teleconference

1. Welcome and apologies for absence

The Chair welcomed attendees to the meeting. Apologies were received from Kirsty Dudley (E.ON), Megan Coventry (SSE) and Mark Jones (SSE).

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.

3. Approval of the Previous Minutes

Attendees reviewed the minutes from the Modification Workstream meeting held on 6th August 2019 (19-08). BH indicated that comments had been received from E.ON with regards to the Proposer of IGT130 being Radhika Kalra and not Kirsty Dudley. Additionally, some minor amendments were made to Item 8; Panel Shipper Representation. BUUK also requested that an additional action be added to the previous list of actions from the August 2019 Workgroup meeting relating to the IGT UNC Code Administrator contacting the SPAA Chair in relation to ensuring the IGT requirements were captured in the Joint Theft Reporting Review Working Group. BH stated that all the amendments would be reflected in the final minutes.

The Chair stated that subject to these amendments, the minutes from the previous Workstream Meeting were approved as a true and accurate record of the meeting.





4. Outstanding Actions

Action Reference	Date	Action	Owner	Status
MWS19/05-01	IWS19/05-01 7th May 2019 CA to review the RG004 outputs and spet to the UNC directly in regard to UNC67		CA	Open
		The workgroup members were informed		
		that this action remains open.		
MWS19/07-11	2 nd July 2019	IGTs to provide the Code Administrator with a list of Shippers on their networks. <i>The</i>	IGTs	Closed
		Workgroup members agreed for this to		
		be closed as, although not all IGT's had		
		provided this information, enough IGTs		
		had.		
MWS19/07-12	2 nd July 2019	Code Administrator to send out	CA	Closed
	, ,	communications to the JO in regards to		
		obtain shipper contact details for IGTs. <i>The</i>		
		Code Administrator contacted the JO		
		and communications were sent out to		
		their distribution list.		
MWS19/09-01	3 rd September	Code Administrator to coordinate with the	CA	Closed
	2019	Joint Office to facilitate a coordinated		
		approach to the development of IGT129		
		and UNC 695. The Code Administrator,		
		IGT129 Proposer and UNC 695 Proposer		
		have been liaising in regards to the legal		
		text for IGT129 and UNC 695 of which		
		they are now aligned.		
MWS19/09-02	3 rd September	CB to ensure that the solution for IGT129	СВ	Closed
	2019	was pointing to the right regulatory		
		requirements. CB indicated that this		
		would be covered within the discussion		
		surrounding IGT129.		
MWS19/09-03	3 rd September	Code Administrator to review legal text and	CA	Closed
	2019	relevant Ancillary Document for IGT130 and		
		circulate ahead of the Workstream meeting		
		in October 2019. The Code Administrator		
		has sent out the reviewed legal text and		



		Ancillary Document that will be reviewed		
		in the October Workstream meeting.		
MWS19/09-04	3 rd September 2019	in the October Workstream meeting. Code Administrator to finalise workgroup report for RG007 and circulate to workgroup members for a review period, prior to presentation to the IGT UNC Modification Panel in September 2019. If material changes are received during review, Code Administrator to defer Panel discussions and bring to the Modification Workstream meeting in October 2019 for discussion on proposed amendments. The Code Administrator circulated the report for RG007; some minor changes were received, and the report went to the	All members	Closed
		September Panel.		
MWS19/09-05	3 rd September 2019	Code Administrator to amend the Known Issues Register with the changes highlighted in Item 9. <i>The Code Administrator amended the Known</i> Issues Register accordingly.	CA	Closed
MWS19/09-06	3 rd September 2019	Code Administrator to liaise with the JO to ensure any cross-code modifications are identified and if there are any impacts on the IGT UNC. The Chair indicated that an there had been an initial meeting with the Joint Office. The Code Administrator will report on progress as and when it occurs.	CA	Closed
MWS19/09-06	3 rd September 2019	Code Administrator to contact the Chair of the Joint Theft Reporting Review Group (UNC 677R) to ensure that IGT requirements are captured during the final meeting scheduled on 27th September 2019. The Code Administrator informed members that the chair of UNC677 had been contacted with regards to IGT requirements being captured in the final	CA	Closed





meeting.		
9 All members to provide feedback to	'	New
Radhika concerning IGT130.	members	
9 Code Administrator to request from Ofgem	CA	New
any ICO statements provided to them in		
relation to MPRN level data.		
9 Code Administrator to speak to the	CA	New
Authority to see if they have a view with		
regards to the proposed options to solve		
quoracy issues.		
9 Code Administrator to determine the nature	CA	New
of the obligations in the Shipper licence in		
relation to both the IGT UNC and UNC.		
9 ER to liaise with the onboarding team at	CA	New
Xoserve to determine the commitments		
made by parties when they sign-up as a		
new Shipper.		
9 Code Administrator to review the UNC code	CA	New
obligations for Supply Meter Point Isolations		
in relation to the issue on the Known Issues		
Register.		
9 ER to review all the UNC UIG related	CA	New
modifications to determine if the intent of		
these might be suitable for amalgamation		
into one IGT modification or whether these		
should remain separate.		
2019	All members to provide feedback to Radhika concerning IGT130. Code Administrator to request from Ofgem any ICO statements provided to them in relation to MPRN level data. Code Administrator to speak to the Authority to see if they have a view with regards to the proposed options to solve quoracy issues. Code Administrator to determine the nature of the obligations in the Shipper licence in relation to both the IGT UNC and UNC. ER to liaise with the onboarding team at Xoserve to determine the commitments made by parties when they sign-up as a new Shipper. Code Administrator to review the UNC code obligations for Supply Meter Point Isolations in relation to the issue on the Known Issues Register. ER to review all the UNC UIG related modifications to determine if the intent of these might be suitable for amalgamation into one IGT modification or whether these	All members to provide feedback to Radhika concerning IGT130. Code Administrator to request from Ofgem any ICO statements provided to them in relation to MPRN level data. Code Administrator to speak to the Authority to see if they have a view with regards to the proposed options to solve quoracy issues. Code Administrator to determine the nature of the obligations in the Shipper licence in relation to both the IGT UNC and UNC. ER to liaise with the onboarding team at Xoserve to determine the commitments made by parties when they sign-up as a new Shipper. Code Administrator to review the UNC code obligations for Supply Meter Point Isolations in relation to the issue on the Known Issues Register. ER to review all the UNC UIG related modifications to determine if the intent of these might be suitable for amalgamation into one IGT modification or whether these



5. Modification Workgroups

IGT130 – Applying password protection encryption to electronic communication containing MPRNs

RK, the Proposer stated that she was satisfied with the legal text and agreed with the amendments carried out by the Code Administrator. RK indicated that the legal text made the obligations on the Pipeline User and Pipeline Operator clear and consequently set out what she wanted to achieve from IGT130. Workgroup members agreed that the way the legal text had been drafted satisfies the intent of IGT130.

IGT members questioned what information this modification is intending to protect. The Chair informed workgroup members that the Information Commissioner's Office (ICO) view is that MPRN level data is personal data and that Ofgem's legal team discussed this with the ICO.

The Chair agreed to contact Ofgem to see if any statements from the ICO indicating this are available in the public domain.

IGT members expressed their concerns about the ability to connect an address of a service pipe to a person through an MPRN. IGT members also highlighted issues around increased workloads and communication times due to the sharing of passwords. In practice, this can present issues due to the variety of different passwords used by Shippers and Transporters.

RK indicated that she would like IGT130 to progress and asked for support from workgroup members. RK stated that she will take it back for review with Kirsty Dudley and welcomed any comments or feedback from workgroup members.

RK also asked for this to be brought back to the November 2019 Workstream meeting.

Action MWS19/10-01: All members to provide feedback to Radhika concerning IGT130.

Action MWS19/10-02: Code Administrator to request from Ofgem any ICO statements provided to them in relation to MPRN level data.

6. Modification Workgroups

<u>IGT129 – Obligations on Shippers to pass Transporter compensation payments on to consumers, via</u> Suppliers

CB, the Proposer indicated that his preferred option for IGT129 was to adopt the new defined term 'Distributed Payment'. However, after the comments made by workgroup members in the September Workgroup meeting he amended the modification to align with UNC695 (Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers). CB stated that the legal text in IGT129 was identical to the legal text in UNC695.

The workgroup reviewed the workgroup report for IGT129. The workgroup agreed that this modification qualified for Self-Governance.





The Workgroup was satisfied with the implementation date and the requirement for alignment with other changes (SCP476 and UNC695). The workgroup agreed that IGT129 satisfied relevant objective C and Objective F by providing greater clarity on Pipeline User responsibilities concerning distributed payments that are facilitated by existing processes.

The Workgroup agreed with the suggested legal text.

The workgroup completed the workgroup report and recommended that this modification should go to October's Panel for decision on whether to send IGT129 for consultation.

7. Modification Workgroups

IGT131 – Automatic updates to Meter Read Frequency

LH, the Proposer introduced her modification IGT131 to workgroup members. LH indicated that all sites with a rolling AQ equal to or greater than 293,000 kWh and a meter point that has either a Smart meter or Automated Meter Reading equipment, should have a monthly read frequency. LH noted that this modification did not make any changes to the must-read requirements. LH stated if a site should drop below a particular threshold that the CDSP would not reverse the meter reading frequency and the intention for this is to future proof the code. LH indicated that the main objective of this modification is to increase the number of meter reads being submitted for settlement within the industry.

The Chair stated to workgroup members that parties are encouraged to participate at the October UNC Distribution workgroup meeting where <u>UNC692S Automatic updates to Meter Read Frequency</u> will be discussed. The Chair highlighted the importance of obtaining an early sight of the UNC692S legal text to ensure all areas are captured as well as helping to draft the legal text for IGT 131.

8. Review Groups

RG005 – IGT UNC Review of Consequential Changes resulting from Faster Switching arrangements

No update.

9. Operational Issues

Panel Shipper Representation – consider possible options

The Chair informed workgroup members that Claire Roberts (Scottish Power) joined the IGT UNC Panel as a Shipper representative at the reconvened IGT UNC Modification Panel held on 24th September 2019. The Chair indicated, as a result of Claire's appointment, the Panel was quorate. The Chair expressed concerns that the IGT UNC Modification Panel still only has two Shipper representatives instead of three. Consequently, there is still a risk that quoracy issues may arise in the future.





The Chair highlighted that other codes have different provisions in place when quoracy issues arise. The Chair asked workgroup members for their views on the different options to solving the quoracy presented in Panel Shipper Representation Paper.

Workgroup members indicated that a hybrid of all the proposed options might be a way forward in solving quoracy issues. Members favoured the rationale/methodology over reducing quoracy in the context of the IGT UNC Modification Panel.

The Chair summarised how the rationale algorithm was formulated whereby it incorporates the function of a party's portfolio size (level of benefit) and the length of service on the Panel (contribution). Workgroup members discussed how the process would be managed and maintained, they concluded that the rationale would likely require deployment by the Authority.

Panel members expressed concerns in relation to poor engagement and diluted decision making, as a result of co-opting a party using the rationale. Panel members indicated that a modification to the code might be the most pragmatic approach to ensure engagement and decision making is maintained.

ER indicated that she would liaise with the onboarding team at Xoserve to determine the commitments made by Parties when they sign up as a new Shipper.

Workgroup members considered the option of employing external consultants to become Panel representative. CB raised concerns in relation to who would fund this.

Workgroup members wanted to seek the Authority's view on the different options for solving quoracy issues, especially in regard to the rationale to ascertain if they had issues.

The Chair stated that the next steps would be for a modification to be raised once the favoured option(s) had been selected. The Chair indicated that the workgroup's views would be relayed back to the Panel at the October 2019 Panel meeting.

Action MWS19/10-03: Code Administrator to speak to the Authority to see if they have a view with regards to the proposed options to solve quoracy issues.

Action MWS19/10-04: Code Administrator to determine the nature of the obligations in the Shipper licence in relation to both the IGT UNC and UNC.

Action MWS19/10-05: ER to liaise with the onboarding team at Xoserve to determine the commitments made by parties when they sign-up as a new Shipper.

10. IGT UNC Known Issues Register

The Workgroup reviewed the current items recorded on the known issues register. The Workgroup agreed with the following changes and comments;

• It was agreed that no changes were required.





Action MWS19/10-06: Code Administrator to review the UNC code obligations for Supply Meter Point Isolations in relation to the issue on the Known Issues Register.

11.Cross-Code Modification Implications

The Chair introduced a document by the Code Administrator which tracks UNC modifications that may have an impact on the IGT UNC.

The Workgroup reviewed the document and discussed the possible implications to the IGT UNC. A summary of the discussion is detailed below;

Mod Ref		Description	Workgroup determination
702		Introducing 'Research Body' as a new User type to the Data Permissions Matrix	The Workgroup was informed that it is likely an IGT modification will be required. The workgroup resolved to monitor this modification.
701		Aligning Capacity booking under the UNC and arrangements set out in relevant Network Exit Agreements	BR indicated that this modification should not have a significant impact on IGTs however, it would be dependent on the legal text. The workgroup resolved to monitor this modification.
700		Enabling large scale utilisation of Class 3	The workgroup was informed that the legal text needed to be reviewed to ascertain if an IGT modification would be required. The workgroup resolved to monitor this modification.
699		Incentivise Key Areas of Performance using additional UIG Charges	No update for UNC699. The workgroup resolved to monitor this modification.
697		Further Realising the Benefit of the Data Permissions Matrix and UNC Consistency Review	The Workgroup was informed that it is likely an IGT modification will be required. The workgroup resolved to monitor this modification.
696		Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant Network Exit Agreements	BR informed workgroup members that UNC696 will be dependent on UNC701. The workgroup resolved to monitor this modification.
695		Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers	BH informed members that UNC695 had progressed to consultation. IGT129 Workgroup report was completed and will be discussed at the October Panel meeting. The workgroup resolved to monitor this modification.
694	R	CDSP provision of Class 1 Read service	BR indicated that Richard Pomroy had presented at the UNC694, however it was deemed contentious, and more clarity is required before an IGT modification can be raised. The workgroup resolved to monitor this modification.
693	R	Treatment of kWh error arising from statutory volume-energy conversion	No update. The Workgroup resolved to monitor this modification.
691		CDSP to convert Class 3 or 4 meter points to Class 1 when G1.6.15 criteria are met	No Update. The Workgroup resolved to monitor this modification.



690		Reduce qualifying period for Class 1	No Update. The Workgroup resolved to monitor this modification.
680	S	UNC changes as a Consequence of 'no deal' United Kingdom Exit from the EU	The workgroup was informed that IGT120F was reviewed at the September Panel however members felt that more clarity around the implementation date was needed. The Chair indicated that an emergency meeting is scheduled on 1st November 2019 for UNC680 if a 'no deal' is implemented. The Workgroup resolved to continue to monitor this modification.
677	R	Shipper Supplier Theft Reporting Request	CB informed workgroup members that the final review group was held on 27th September 2019 and that IGT modification will be raised but waiting on the UNC. The Workgroup resolved to continue to monitor this modification.
676	R	Review of Gas Transporter Joint Office Arrangements	BH informed workgroup members that the review group had discussed providing more autonomy to the Joint Office with regards to raising modifications for housekeeping changes as well as exploring the best way to manage alternative modifications in the future. The Workgroup resolved to monitor the review group.
674		Performance Assurance Techniques and Controls	The Chair informed workgroup members that at the UNC674 workgroup they went through the Performance Assurance Framework (PAF) and the changes that will be made to the document. The Chair indicated that IGT sites will be impacted by these changes and an IGT modification is likely to be needed. The Workgroup resolved to monitor the review group.
672		Incentivise Product Class 4 Read Performance	No Update. The Workgroup resolved to monitor the review group
664		Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4	No Update. The Workgroup resolved to monitor the review group

Action MWS19/10-07: ER to review all the UNC UIG related modifications to determine if the intent of these might be suitable for amalgamation into one IGT modification or whether these should remain separate.

12.AOB

There were no further items for discussion, so the Chair closed the meeting.

The next meeting is scheduled for Tuesday 5th November 2019.

