

IGT UNC Modification Workstream Meeting 19-09

Draft Minutes

Tuesday 3rd September 2019

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee	Organisation	
Paul Rocke (PR)	Gemserv	Chair
Chris Barker (CB)	BUUK	
Brandon Rodrigues (BR)*	ES Pipelines	
Kirsty Dudley (KD)*	E.ON	
Radhika Kalra (RK)*	E.ON	Item 7 only
Mark Jones (MJ)*	SSE	
Megan Coventry (MC)*	SSE	
Ellie Rogers (ER)*	Xoserve	
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 Anne Jackson (Gemserv) and Cher Harris (Indigo Pipelines).

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 BUUK in relation to Action MSWS19/03-03 whereby 'send' needed to be removed from the sentence. BH stated that the amendment would be reflected in the final minutes. The Chair indicated that, subject to this amendment, the minutes from the previous Workstream Meeting were approved as a true and accurate record of the meeting.

4. Modification Workgroups

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

The Chair introduced the modification to workgroup members. The purpose of the modification was to introduce new obligations on Shippers to ensure that IGT compensation payments to consumers were passed onto registered suppliers for onward transmission to consumers. The modification had been raised to ensure obligations proposed in UNC 695 were reflected in the IGT UNC.

The Chair highlighting that three potential solutions were provided in the modification proposal. The Chair indicated that it was best practice to propose a single preferred solution, and to allow the workgroup to develop any alternative approaches. Following dialogue with the proposer for UNC 695, CB – as proposer of IGT129 – recommended that Option 3 as presented in the modification would be the preferred approach.

Option 3 would update IGT UNC Section J to place an obligation on Pipeline Users to relay distributed payments to a consumer via the registered supplier within ten working days of receipt.

CB reflected that further consider would be afforded to whether the proposed legal text would include definitions for distributed payments and registered supplier.

Workgroup members suggested that BUUK should submit an amended modification with the one solution identified. Shippers indicated that it would be preferred for the solution to be closely aligned to UNC 695. Workgroup members requested that a joined-up approach to the delivery of these proposed changes is achieved, through close working between the respective Code Administrators.

One party queried whether there was consistency between IGT129 and UNC 695 with respect to the references to parties' regulatory obligations for making compensation payments to consumers. CB agreed to verify that all references included within the modification were accurate.

Action MWS19/09-01: Code Administrator to coordinate with the Joint Office to facilitate a coordinated approach to the development of IGT129 and UNC 695.

Action MWS19/09-02: CB to ensure that the solution for IGT129 was pointing to the right regulatory requirements.

5. Modification Workgroups

[IGT130 – Applying password protection encryption to electronic communication containing MPRNs](#)

KD introduced the modification, highlighting the aim was to widen the scope of encryption requirements building on those approved via IGT118 ([Amendments to the IGT UNC Password Protection Protocols](#)).

The Chair noted that Radhika Kalra had proposed legal text aimed at delivering the proposed solution for the modification, incorporating amendments to IGT UNC Part K and the Password Protection Protocols Ancillary Document.

Workstream attendees widely agreed that the modification was fit for purpose, and that the proposed legal text facilitated the proposed solution. The Chair queried whether the definition of Protection Information should be limited to that information relating to a ‘customer’ (as drafted) or whether it should be widened to incorporate any ‘person’ (including individuals and corporate bodies). KD considered that the objective of this modification was to protect the end consumer information and sought to ensure that the solution remained proportionate in terms of the obligations it introduced.

Workgroup members discussed the legal text in regard to what was ‘deemed to be personal information’. Members concluded that this was an individual determination by each organisation; the modification intended to ensure that parties would accept encrypted information upon receipt.

In considering the proposed changes to the Ancillary Document, one party noted that a subclause in Section 2.2 was illogical: “and must conform to the above password configuration”. No password configuration appeared in the body of text as suggested. Although not strictly within scope of the Modification, the Proposer agreed that the change to remove the phrase could be facilitated through IGT130 with a view to producing an accurate Ancillary Document.

Workgroup members agreed for amendments to IGT130 and associated legal text to be completed and to be sent out to parties ahead of the Workstream meeting in October 2019. KD indicated that she would be unable to attend the meeting but would like the workgroup report to be progressed (and if possible, finalised) in her absence.

Action MWS19/09-03: Code Administrator to review legal text and relevant Ancillary Document for IGT130, and circulate ahead of the Workstream meeting in October 2019.

6. Review Groups

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

The Chair informed workgroup members that the IGT UNC Response to the Switching Programme and Retail Code Consolidation: “Proposed changes to licences and industry codes” was sent to the Authority on 28th August 2019, and a copy of this could be found on the [IGT UNC website](#). The Chair indicated the cross-code corrections that were ratified in the Workstream meeting in August 2019 had been sent to the Authority with the amended text on 30th August 2019.

BH indicated that [IGT120F – Aligning the IGT UNC with licence changes following the UK leaving the EU with a ‘No deal’](#) will be presented to Panel for final decision in September 2019, due to apparent increased certainty in the date of the UK withdrawal from the European Union.

7. Review Groups

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

The Chair presented the draft of the Review Group report whereby some small amendments were made by workgroup members. The workgroup indicated that they were happy for the Code Administrator to make the final amendments to the report. The Chair indicated that the completed report would be sent out to parties for review. KD proposed that if there were any material changes required then the report should go to the Workstream meeting in October 2019 for further discussion. However, if the changes are small (i.e. grammatical errors), then it should proceed to the Panel meeting in September 2019. Workgroup members agreed with this process.

Action MWS19/09-04: 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.

8. Panel Shipper Representation

The Chair provided an overview of the quoracy issues that the IGT UNC Modification Panel was currently facing. The Chair indicated that the Code Administrator had developed a rationale to appoint Panel members. The Chair stated that the rationale still needed to go through scenario testing and once complete, a Panel paper should be available for the meeting in September 2019.

KD indicated that instructing parties to participate could cause and a lack of engagement that could result in further poor representation and decision making in the long term. KD suggested that another strategy could be implemented to reduce the quorum requirements in the IGT UNC. KD indicated that it was important to fix this issue now but for the future as well. The Chair indicated that he would feedback this information to Panel members at the September meeting. Workgroup members requested that any Panel determinations relating to a solution should be reported in the October workgroup.

9. 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;

- MDD moving into UNC from SPAA to be removed from the Known Issues Register as this has been implemented through modification IGT124.
- Add Panel Shipper Representation to the Known Issues Register
- Add 'Password Protection Protocols' Ancillary Document (Section 2.2) – remove 'and must conform to the above password configuration' to Housekeeping Corrections section

Action MWS19/09-05: Code Administrator to amend the Known Issues Register with the changes highlighted in Item 9.

10.Outstanding Actions

MWS19/05-01	7 th May 2019	CA to review the RG004 outputs and speak to the UNC directly in regards to UNC676. <i>Anne Jackson is meeting with Rebecca Hailes to discuss this.</i>	CA	Open
MWS19/07-11	2 nd July 2019	IGTs to provide the Code Administrator with a list of Shippers on their networks. <i>The Code Administrator is developing a contact list.</i>	IGTs	Open
MWS19/07-12	2 nd July 2019	Code Administrator to send out communications to the JO in regards to obtain shipper contact details for IGTs. <i>The Code Administrator to liaise with JO.</i>	CA	Open
MWS19/08-01	6 th August 2019	Code Administrator to speak to the CDSP about sending a representative to future IGT UNC Workstream meetings. <i>The Code Administrator contacted the CDSP requesting attendance to future IGT Workstream meetings which has now been agreed.</i>	CA	Closed
MWS19/08-02	6 th August 2019	Code Administrator to send out finalised draft of the IGT UNC REC consultation response to workgroup members for review. <i>The Code Administrator sent out the finalised draft of the IGT UNC REC consultation response for review.</i>	CA	Closed
MWS19/08-03	6 th August 2019	Code Administrator to provide the August Panel with a list of cross-referencing errors. <i>The Code Administrator provided a list of cross-referencing corrections to the August Panel.</i>	CA	Closed
MWS19/08-04	6 th August 2019	Code Administrator to make amendments to the RG006 review group report and send this out to review group members for review.	CA	Closed

		<i>The Code Administrator amended the RG006 review group report and circulated this for review.</i>		
MWS19/08-05	6 th August 2019	RK and KD to submit a modification proposal for review at the August Panel. <i>RK and KD submitted IGT130.</i>	RK and KD	Closed
MWS19/08-06	6 th August 2019	Code Administrator and BUUK to speak to UNC695 proposer about other proposed options. <i>BUUK provided an update in regards to the view of the UNC695 in Item 4.</i>	CA and BUUK	Closed
MWS19/09-01	3 rd September 2019	Code Administrator to coordinate with the Joint Office to facilitate a coordinated approach to the development of IGT129 and UNC 695.	CA	New
MWS19/09-02	3 rd September 2019	CB to ensure that the solution for IGT129 was pointing to the right regulatory requirements.	CB	New
MWS19/09-03	3 rd September 2019	Code Administrator to review legal text and relevant Ancillary Document for IGT130, and circulate ahead of the Workstream meeting in October 2019.	CA	New
MWS19/09-04	3 rd September 2019	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.	All members	New

MWS19/09-05	3 rd September 2019	Code Administrator to amend the Known Issues Register with the changes highlighted in Item 9.	CA	New
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.	CA	New
MWS19/09-07	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 27 th September 2019.	CA	New

11. 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
701	Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs	The workgroup was informed that modification was raised originally as an alternate for UNC696. However, Panel felt that it should be treated as a standalone modification. BR informed members that he would keep a watching brief over this modification to ascertain if a mirror modification is required in the IGT UNC. The workgroup resolved to monitor this modification.
700	Enabling large scale utilisation of Class 3	The workgroup was informed that this modification was approved by the Authority. The Code Administrator indicated that now the legal text was available it would check to see if there is any change required in the IGT UNC. 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	No update for UNC697. The workgroup resolved to monitor this modification.
696	Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs	The Workgroup were informed that an alternate modification had been raised for UNC696 however Panel determined that it should be treated as a standalone modification (UNC701). BH informed the workgroup that UNC696 had progressed to consultation. The workgroup resolved to monitor this

			modification.
695		Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers	CB provided an overview of IGT129 and the workgroup discussed the various options. It was determined that the modification should align as closely as possible to the UNC. The workgroup resolved to monitor this modification.
694	R	CDSP provision of Class 1 Read service	BR indicated that he is waiting on the UNC before he drafted a mirror modification for the IGT UNC. The workgroup resolved to monitor this modification.
693	R	Treatment of kWh error arising from statutory volume-energy conversion	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	The Workgroup were informed that UNC691 required further amendments. The Workgroup resolved to monitor this modification.
690		Reduce qualifying period for Class 1	The Workgroup were informed that UNC690 now included Class 2 and that an amended modification would be submitted to allow for the legal text to be produced. The Workgroup resolved to monitor this modification.
682		Market Participant MDD Migration to UNC Governance from the SPAA	The Workgroup were informed on the 22 nd August 2019 that the Authority directed modifications UNC682, IGT124 and SCP467 can be made. The workgroup was informed that planned implementation date for this 28 th February 2019. The Workgroup resolved to remove this modification from the tracker.
680	S	UNC changes as a Consequence of 'no deal' United Kingdom Exit from the EU	The Workgroup were informed that IGT120F would be presented to Panel for final decision due to the current political circumstances. The Workgroup resolved to continue to monitor this modification.
677	R	Shipper Supplier Theft Reporting Request	CB informed workgroup members that he was waiting on the UNC before drafting an IGT UNC modification. The Workgroup resolved to continue to monitor this modification.
676	R	Review of Gas Transporter Joint Office Arrangements	The Workgroup resolved to monitor the review group.
674		Performance Assurance Techniques and Controls	NO update for UN674. The Workgroup resolved to monitor the review group.
672		Incentivise Product Class 4 Read Performance	The workgroup was informed that depending on the legal text for UNC672 an IGT modification may be required. 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	The workgroup was informed that depending on the legal text for UNC664 an IGT modification may be required. The Workgroup resolved to monitor the review group

Action MWS19/09-06: 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.

Action MWS19/09-07: 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.

12. AOB

None.