

IGT UNC Modification Workstream Meeting 19-11

Draft Minutes

Tuesday 5th November 2019

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee		Organisation	
Anne Jackson	(AJ)	Gemserv	Chair
Andrew Wallace	(AW)*	Ofgem	Agenda Item 5
John Wiggins	(JW)*	Ofgem	Agenda Item 5
Chris Barker	(CB)	BUUK	
Brandon Rodrigues	(BR)*	ES Pipelines	
Cher Harris	(CH)*	Indigo Pipelines	
Claire Roberts	(CR)*	Scottish Power	
Oorlagh Chapman	(OC)	British Gas	
Kirsty Dudley	(KD)*	E.ON	
Radhika Kalra	(RK)*	E.ON	Agenda Item 6
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. No apologies were received.

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 raise.

3. Approval of the Previous Minutes

Attendees considered the minutes from the Modification Workstream meeting held on 1st October 2019 (19-10). BH indicated that no comments had been received.

4. Outstanding Actions

Outstanding actions were reviewed by the workgroup. Please see Appendix 1 for a record of the discussion and a record of new actions.

5. Modification Workgroups

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

RK, the proposer, stated that the IGTs expressed concerns at the October 2019 IGT UNC Workstream meeting in relation to the solution for IGT130. RK stated that some IGTs highlighted that it would result in an increased workload for their organisations if this solution was implemented. RK indicated that she had amended the solution of the modification to remove the specific need to password protect all MPRN level data and that the decision on whether password encryption should be applied would be at the sole discretion of the 'sending organisation'.

Workgroup members discussed the amended modification proposal and IGTs indicated concerns around what would be classed as a data breach and when how the use of MPRN level data might be considered personal data. Some IGT's were unhappy that the process was not more defined, that it would be difficult to implement the modification internally for all parties (both from a process and efficiency perspective) and that any use of an MPRN could result in being reported to the Information Commissioner's Office (ICO). RK highlighted that the Information's Commissioner's Office (ICO) declared that MPRN level data is personal data and that if the recipient felt that personal data had not been handled correctly by the sender then the receiver could report the matter to the ICO, although this is not a requirement under the modification.

The Chair explained that the updated legal text does not state that parties have to report a breach to the ICO however she reiterated that there was a risk of this happening if a breach occurred.

Ofgem had provided information to the Chair regarding the information provided by the ICO to them as part of their discussions with the ICO. The Chair read the following statements from the Information Commissioner's Office response to the Competition and Market Authority's "Energy market investigation; Notice of possible remedies" (August 2015) to workgroup members:

- "The Data Protection Act (1998) (DPA) is concerned with the processing of "personal data". Personal data is data which relates to a living individual who can be identified from that data either itself, or in combination with other information".
- "An MPAN uniquely identifies an electricity supply point, which is often a particular property (or a commercial property, where the business owner is a sole trader), is likely to be personal data even if the name of the individual (or individuals) who live there is not known".

IGTs indicated that they could not support the new modification solution as they deemed it to be an inefficient solution and open to interpretation. They indicated that the Password Protocol currently applies to specific processes and that this modification will add in the application of the Password Protocol on a generic type of data. It was suggested that the solution could be reviewed considering this. KD did not want to return to reviewing the solution and reiterated that the updated solution in IGT130 was aimed at meeting IGTs halfway with the paramount focus on protecting consumer data.

KD shared experiences she had this year when she had been the recipient of personal data that was not meant for E.ON.

IGTs indicated that due to the change in the solution and legal text, the title of the modification would need to reflect this. RK and KD stated they would make amendments to the modification following the workgroup discussion. KD requested that the code administrator drafts a workgroup report for the December 2019 IGT UNC workstream meeting.

19/11-01: Code Administrator to draft a workgroup report for the IGT130 for the December 2019 IGT UNC workstream meeting.

[IGT131 – Automatic updates to Meter Read Frequency](#)

BH indicated that Louise Hellyer, the proposer for IGT131 had submitted an updated modification proposal and the legal text for [UNC692S Automatic updates to Meter Read Frequency](#). BH stated that after an initial assessment of the draft legal text for UNC692 it was identified that the IGT UNC points across to Section M paragraph 5.9 of the UNC where the suggested changes are being made therefore this should be captured without the need for IGT131.

BR asked if the must-read process would be altered as a result of IGT131. ER indicated that IGT131 would not change the must-read process, however Distribution Network Operators have raised a change proposal to the DSC regarding the must-read process which could impact IGT sites and would be discussed at the next Change Management Committee meeting.

[IGT132 – Introduction to IGT Code Credit Rules](#)

The Chair indicated that the proposer's intention was for ([IPL042 – Removal of Code Credit Rules from IPL Network Code](#)) and ([QPL042 – Removal of Code Credit Rules from QPL Network Code](#)) to be discussed with IGT132 as these network code changes are dependent on this modification. CB, the proposer, indicated that since raising the modification (IGT132) he now believed that the Ofgem guidance on which it was ultimately based is now out of date with today's operational realities. CB will endeavour to bring back an amended change.

[IGT133 – Transition of IGT Theft Reporting into the IGT UNC.](#)

CB, the proposer for IGT133 indicated that as a result of the recommendations from Joint Theft Reporting Review Working Group two other modifications have been raised, - [SCP480 – Amendments to Schedule 33 Theft Reporting Requirements](#) and [UNC704 – Review of Transporter Theft Reporting](#). CB highlighted that the only theft reporting requirements on IGTs is within the SPAA Schedule 33 (Theft Code of Practice) and this is being removed. The Review Group recommended that a process for providing this reporting for the Authority needed to be incorporated into the IGT UNC. CB explained that the solution provided for the provision of reports on an ad hoc basis, as and when requested by the Authority.

The Chair wanted to ascertain which theft reporting was being covered within IGT133. The proposer confirmed that it was theft that the Pipeline Operator is responsible for. The proposer indicated that the reporting for IGT theft would be based on the data items set out in [UNC704 – Review of Transporter Theft Reporting](#) when the legal text drafting is provided. Shippers questioned why this reporting was not being placed within the remit of the Retail Energy Code (REC). It was determined by IGTs that the theft reporting was not exclusively a retail issue.

Shippers indicated that the data being collected through IGT133 could be valuable to Unidentified Gas (UIG). Shippers requested that the CDSP provide an update as to whether all theft reporting is being properly recorded and fed into the Allocation of Unidentified Gas Expert (AUGE) modelling. Shippers wanted to ascertain how IGTs calculate lost in theft in conveyance across all their networks and if this is consistent across all.

19/11-02: IGTs to provide how they calculate energy losses due to theft in conveyance across their networks.

It was suggested that the data items from [UNC704 – Review of Transporter Theft Reporting](#) would be appended to the IGT modification. It was also noted that the IGT modification does not mirror the modification raised in the UNC. A Pipeline User enquired why this was not the case as this would be their preference. The proposer indicated that Ofgem had indicated in the review group that they had never used the reports and the proposer felt that it was inefficient to alter processes and produce reports that would not be used, when the reports could be produced when required. Distribution Networks plan to ask the CDSP (Central Data Service Provider) to collate the reports on their behalf and the IGT's will not be using the CDSP.

Workgroup members discussed the different options provided by the proposer within the solution of IGT133 and it was determined that option two was the preferred choice. The Chair indicated that this would involve the code administrator collecting and collating the data for the Pipeline Operators. The IGT UNC code administration contract will need to be reviewed.

The proposer indicated that he would amend the modification to reflect the preferred option, depending on the drafting of the UNC 704 legal text, and the availability of the final data item selection. On the assumption that these are available, the proposer intends for the workgroup report to be completed at the December 2019 IGT UNC Workstream meeting

19/11-03: CB to provide an amended modification for IGT133 for the December 2019 IGT UNC Workstream meeting.

19/11-04: CDSP to provide an update as to whether all theft reporting, where the transporter is responsible, is being properly recorded and fed into the AUGE modelling.

6. Centralising access to industry metadata

The Authority presented the [REC Data Specification and UK Link File Formats presentation](#) to workgroup members. The Authority highlighted that the new REC Data Catalogue would incorporate all metadata under one roof including the Central Switching Service Interface Specification, Electricity Data Transfer Catalogue, Gas RGMA Data Flow Catalogue, Gas Supplier Data Flow Catalogue and Gas UK Link Manual. The Authority indicated that the aim of the REC Data Specification was to create a metadata standard and a single energy market data depository.

The Authority explained that the REC Code Manager would manage the end to end processes of the single data depository. The catalogue will explain who the code owner is and the data items they individually manage.

The Authority wanted to understand if there were any IGT UNC specific data items or flows that should be considered within the REC Data Catalogue. Workgroup members indicated that the only process that they could currently think of that would fall under the scope of the REC Data Catalogue was the PSA process. Workgroup members highlighted that a review of the IGT UNC Ancillary documents needed to be carried out to identify if any of IGT UNC data items or flows should be included.

The Chair stated that the Authority wants parties and the code to sort out the Panel Shipper Representation issue between them. Workgroup members discussed the various options and indicated a variety of preferences.

The Chair explained that under the Gas Shipper Licence there are no obligations relating to Shipper participation. However, there is a loose link to the Network Code in Condition 3 (General Obligations in Respect of Relevant Transporter's Pipeline System) Part 2c.

ER indicated that she had liaised with the onboarding team at Xoserve with regards to the commitments made by parties when they sign up as a new Shipper. ER highlighted the following points:

- The CDSP manage User Accession to the UNC and the DSC on behalf of the Transporters. Where a Shipper has indicated that they wish to join an IGT network (which is on the application form) we provide the Shipper, IGT contact details to arrange the necessary security and Framework agreements. After which the IGT will then confirm to Xoserve by this [form](#) that there is an accession agreement.
- When the User has finished the necessary entry critical for UNC the User will be added on to central systems and classed as a UNC User. Where there is no agreement in place for either an IGT or GT, the system will have a sanction put in place, this will reject any attempt to take a site for that GT or IGT.

Members expressed concerns if an organisation co-opted onto the Panel is likely to degrade the decision making that is made. Workgroup members wanted to understand why Pipeline Users are not engaged with the code.

It was determined that a survey should be sent to Pipeline Users to ascertain this and that this could be circulated through the CDSP, as well as the Joint Office and IGT UNC distribution lists. ER stated that she would check with the communications team at the CDSP to see if they were satisfied to send out the survey to the CDSP's distribution list.

BH asked workgroup members to provide any questions they would like included in the survey by close of business on Friday 8th November 2019.

19/11-05: All members to provide any questions they would like included in the Pipeline User engagement survey to understand the lack of engagement with the IGT UNC.

19/11-06: Code Administrator to collate the questions provided into a survey.

19/11-07: ER to check with the communications team at the CDSP to see if they are satisfied to send out the survey to the CDSP's distribution list.

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

- Communication between Pipeline Operators and Pipeline Users within the data sharing processes to be removed from the Known Issues Register.

9. Cross-Code Modification Implications

The Chair introduced the 'Cross Code Tracker', 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 and a summary of the discussion is detailed in Appendix 2.

KD indicated that she was still concerned with the lack of cross code workings and would like to see an improvement as soon as possible. She had a number of requests of the Code Administrator and the Chair advised that these should be made at Panel rather than the Workgroup.

The Chair stated that the Code Administrator had already committed to update the Panel and the Workgroup as progress is being made.

10.AOB

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

The next meeting is scheduled for Tuesday 3rd December 2019.

Appendix 1

MWS19/05-01	7 th May 2019	CA to review the RG004 outputs and speak to the UNC directly regarding UNC676. <i>The workgroup members were informed that AJ had sent an email to the chair of the UNC 676 workgroup in relation to RG004 outputs.</i>	CA	Closed
MWS19/10-01	1 st October 2019	All members to provide feedback to Radhika concerning IGT130. <i>Action discussed during IGT130 discussions.</i>	All members	Closed
MWS19/10-03	1 st October 2019	Code Administrator to speak to the Authority to see if they have a view with regards to the proposed options to solve quoracy issues. <i>Action discussed during Panel Shipper Representation discussions.</i>	CA	Closed
MWS19/10-04	1 st October 2019	Code Administrator to determine the nature of the obligations in the Shipper licence in relation to both the IGT UNC and UNC. <i>Action discussed during Panel Shipper Representation discussions.</i>	CA	Closed
MWS19/10-05	1 st October 2019	ER to liaise with the onboarding team at Xoserve to determine the commitments made by parties when they sign-up as a new Shipper. <i>Action discussed during Panel Shipper Representation discussions.</i>	CA	Closed
MWS19/10-06	1 st October 2019	Code Administrator to review the UNC code obligations for Supply Meter Point Isolations in relation to the issue on the Known Issues Register. <i>Action discussed during the Known Issues Register discussions. The workgroup determined for this action to remain open.</i>	CA	Open
MWS19/10-07	1 st October 2019	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. <i>Action discussed during the Cross-Code Implications discussions.</i>	CA	Closed
MWS19/11-01	5 th November 2019	Code Administrator to draft a workgroup report for the IGT130 for the December 2019 IGT UNC workstream meeting.	CA	New

MWS19/11-02	5 th November 2019	IGTs to provide how they calculate energy losses due to theft in conveyance across their networks	IGTs	New
MWS19/11-03	5 th November 2019	CB to provide an amended modification for IGT133 for the December 2019 IGT UNC Workstream meeting.	CB	New
MWS19/11-04	5 th November 2019	CDSP to provide an update as to whether all theft reporting, where the transporter is responsible, is being properly recorded and fed into the AUGE modelling.	CA	New
MWS19/11-05	5 th November 2019	All members to provide any questions they would like included in the Pipeline User engagement survey to understand the lack of engagement with the IGT UNC.	All members	New
MWS19/11-06	5 th November 2019	Code Administrator to collate the questions provided into a survey.	CA	New
MWS19/11-07	5 th November 2019	ER to check with the communications team at the CDSP to see if they are satisfied to send out the survey to the CDSP's distribution list.	ER	New

Appendix 2

Mod Ref		Description	Workgroup determination
704		Review of Transporter Theft Reporting	Raised as a result of work carried out in UNC677 review group. Workgroup members discussed UNC704 during IGT133 discussions. The workgroup agreed to continue monitoring this modification.
702		Introducing 'Research Body' as a new User type to the Data Permissions Matrix	Draft IGT Modification has been provided. The workgroup agreed to continue monitoring this modification.
701		Aligning Capacity booking under the UNC and arrangements set out in relevant Network Exit Agreements	No Update. The workgroup agreed to continue monitoring this modification.
700		Enabling large scale utilisation of Class 3	UNC700 was implemented in September 2019. The workgroup agreed to continue monitoring this modification.
699		Incentivise Key Areas of Performance using additional UIG Charges	The Proposer highlighted some new proposals to the workgroup as a result of discussions from the previous meeting. The Panel discussed these proposals however they felt that more work was required before the legal text could be drafted. Due to early stages of UNC699 it was difficult to ascertain if an IGT Modification would be required. ER confirmed that due to the early stages that UNC699 is currently in it is difficult to know if an IGT modification will be needed.
697		Further Realising the Benefit of the Data Permissions Matrix and UNC Consistency Review	Draft IGT Modification has been provided. The workgroup agreed to continue monitoring this modification.
696		Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs	Awaiting Authority Decision. The workgroup agreed to continue monitoring this modification.
695		Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers	IGT129 was discussed at the October 2019 IGT UNC Panel whereby it was sent out for consultation with a close out date of 12 th November 2019. The workgroup agreed to continue monitoring this modification.
694	R	CDSP provision of Class 1 Read service	The UNC workgroup discussed the amended modification and agreed that more information needed to be added in relation to clarification by which the meter reads should be delivered. The proposer indicated the intention was to submit the draft modification for consideration at the November UNC Panel. The workgroup agreed to continue monitoring this modification.
693	R	Treatment of kWh error arising from statutory volume-energy conversion	The UNC workgroup agreed to defer discussion for UNC693 until further consideration can be given on the available temperature and pressure data. The workgroup agreed to continue monitoring this modification.
692		Automatic updates to Meter Read Frequency	An amended modification was received for IGT131. The proposer has provided the draft legal text for UNC692. The IGT UNC already points to the Section in question thus it is likely that IGT131 will no longer be required. Workgroup members discussed UNC692 during IGT131 discussions. The workgroup agreed to continue monitoring this modification.
691		CDSP to convert Class 3 or 4 meter points to Class 1 when G1.6.15 criteria are met	The UNC workgroup discussed the amended modification whereby the proposer indicated that the solution now placed an obligation on the Transporter and the User. The Workgroup recommended an amendment to the modification whereby Page 11 of 12 IGT UNC

			<p>Modification Workstream 19-11 clarity was needed in relation to the term Business Days. The proposer stated that he would review the legal text once it has been produced to ascertain if an IGT Modification is needed.</p> <p>ER indicated that if an IGT equivalent is required, this could be considered with the same for mod 0690S i.e. to raise a single IGT mod to cover both, as both impact the same area of UNC. The workgroup agreed to continue monitoring this modification</p>
690		Reduce qualifying period for Class 1	<p>It is anticipated that the legal text for UNC690 could now be produced. British Gas indicated that IGTs needed to be included within the scope of the Modification. British Gas indicated that they would ascertain if an IGT Modification was required.</p> <p>See ER's comment above for UNC 0691. The workgroup agreed to continue monitoring this modification.</p>
680	S	UNC changes as a Consequence of 'no deal' United Kingdom Exit from the EU	<p>The Panel agreed that IGT120F should be implemented, subject to the 15-day objection window. The IGT UNC Panel agreed that the implementation date is conditional on the United Kingdom leaving the European Union with a 'no deal' (without a divorce agreement).</p> <p>The link between the IGT and UNC modifications has been severed as IGT 120F does not point into the UNC and has been implemented conditional on a no-deal exit from the EU.</p>
677	R	Shipper Supplier Theft Reporting Request	<p>As a result of the recommendations from the Joint Theft Review Reporting Group, UNC704 and IGT133 have been raised.</p> <p>Workgroup members discussed UNC677 during the IGT133 (the IGT UNC equivalent mod) discussions.</p>
676	R	Review of Gas Transporter Joint Office Arrangements	<p>No Update.</p> <p>The workgroup agreed to continue monitoring this modification.</p>
674		Performance Assurance Techniques and Controls	<p>The workgroup for UNC674 went through the changes made to the amended modification. In relation to an IGT Modification being required, AJ indicated that once the legal text had been drafted then this would trigger the raising of an IGT modification, but a sponsor would be required to process this modification.</p> <p>The Chair provided an update to workgroup members highlighting that an extension for UNC674 is being requested of Panel. Once the legal text had been drafted then an IGT modification would be raised. The workgroup agreed to continue monitoring this modification.</p>
672		Incentivise Product Class 4 Read Performance	<p>The workgroup for UNC672 met on 22nd October 2019. The workgroup discussed the amended modification and it was determined that the new performance measures should be titled and defined clearly in Section M of the TPD. IGTs are likely to be impacted by this Modification. Consequently, the legal text for UNC672 will need to be compared against the IGT UNC to see if an IGT modification needs to be raised. Workgroup members indicated that due to UNC672 changing the legal text in Section M of the TPD, it is unlikely that an IGT modification will be needed due to the IGT UNC pointing over to Section M at a high enough level. The workgroup agreed to continue monitoring this modification.</p>
664		Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4	<p>The workgroup for UNC664 met on 22nd October 2019. The workgroup discussed the idea of moving its from Class 1 and 2 to Class 4 if the read performance target cannot be reached. MJ to review the need for an IGT Modification and if necessary, raise an IGT Modification.</p> <p>MJ indicated that an updated modification UNC664 would be released shortly. MJ stated that he was currently reviewing whether an IGT Modification was needed. The workgroup agreed to continue</p>

			monitoring this modification.
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