

## **IGT UNC Modification Panel Meeting 20-02**

### **Draft Minutes**

**Friday 28<sup>th</sup> February 2020**

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

<b>Attendee</b>	<b>Organisation</b>	<b>Representing</b>	<b>As</b>
Anne Jackson (AJ)	Gemserv	Code Administrator	Chair
Jenny Rawlinson (JR)*	BUUK	Pipeline Operator	
Claire Roberts (CR)*	Scottish Power	Pipeline User	
Cher Harris (CH)*	Indigo Pipelines	Pipeline Operator	
Victoria Parker (VP)*	ESP Utilities	Pipeline Operator	
Jonathan Coe (JC)*	Ofgem	Authority	
Mark Bellman (MB)	Scottish Power	Mod Proposer	Observer
Kemi Fontaine (KF)	Gemserv	Code Administrator	Secretariat

*\*Attended via teleconference*

### **1. Alternates, observers and apologies**

The Chair welcomed attendees to the IGT UNC Modification Panel meeting and indicated that apologies were received from Kirsty Dudley (E.ON) and Liam King (Ofgem). The appointed alternates were Claire Roberts for Kirsty Dudley (KD) and Jonathan Coe for Liam King (LK).

### **2. Confirmation of Agenda**

The Chair confirmed the items for discussions as outlined in the final agenda. Panel members did not have any other business to raise.

### **3. Approval of the previous minutes**

KF informed the Panel that there would be review of two sets of minutes, one for the Panel meeting held on 24<sup>th</sup> January 2020 and an ex-committee meeting held on 31<sup>st</sup> January 2020.

KF stated that one comment had been received for the Panel minutes for 24<sup>th</sup> January 2020 from LK on the actions and notes regarding the BEIS consultation. This has now been amended to state the following: 'The authority noted that further clarity was needed on the factors of the BEIS consultation which would likely impact the SCR'. Subject to the stated amendment being made the Panel agreed that the minutes were an accurate reflection of the meeting discussion.

No comments had been received for the ex-committee meeting held on 31<sup>st</sup> January 2020 and the minutes were approved as an accurate record of the meeting.

### **4. Outstanding actions**

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

**20/01-01-** This action was amended prior to the Panel meeting; JC provided an update in accordance with the amended action and stated the recent consultation stems from changes that BEIS propose to make to the way DCC will charge for its services from 1<sup>st</sup> April 2021.

“Under the proposed approach, DCC need to identify AMR sites to ensure that non-domestic energy Suppliers are not charged for DCC services in respect of those sites. To determine this, the DCC needs to know the total number of relevant consumers for each Non-Domestic Supplier and the number of Advanced Meters that have been installed by that supplier. DCC already has information on how many relevant consumers each Non-Domestic Supplier has (from the Registration Data). However, it does not currently know how many Advanced Meters each such supplier has. They are proposing changes to the UNC and to the MRA to require this information to be sent to the DCC, by CDSP and MPAS provider respectively. The changes themselves are straightforward, and whilst the timing is unfortunate in respect of the SCR and closure of the MRA, these obligations will be picked up in REC drafting. The changes will be given effect through a Statutory Instrument and are expected to come into force this Autumn, in time to inform DCC ahead of 21<sup>st</sup> April 2020 charges being issued”

It was agreed by Panel that the following actions had been completed and could be closed: **20-01-02** and **20-01-03**.

It was agreed that actions **20-01-04** and **20-01-05** had been completed and would be presented and discussed under agenda Items 5 and 10 and could therefore be closed.

## 5. New Modification Proposals

### [IGT137- Alignment of the IGT UNC to the UNC in advance of Faster Switching](#)

The Chair presented IGT137 to Panel members and explained that this modification will take account within the IGT UNC of the reordering of the UNC that is proposed by UNC Modification (0708 - Re-ordering of the UNC in advance of Faster Switching) and thereby ensure the consistency between IGT UNC and UNC. The Chair further explained the UNC mod 708 would only be changing the ordering of the UNC and not the governance and therefore it will not have any implications to Parties. Panel members stated that in future this modification should be discussed in conjunction with Review Group RG005 (IGT UNC Review of Impacts resulting from the Faster Switching Programme Arrangements) as this mod is related. The Panel unanimously agreed that IGT137 should be a self-governance decision and that the modification should be sent to Workgroup on Friday, 13<sup>th</sup> March 2020 for development.

### [IGT138 -Performance Assurance Techniques and Controls](#)

MB introduced IGT138 to Panel members. MB provided the background to the work of the Performance Assurance Committee (PAC) and its powers to assure performance provided under the UNC. The overall purpose is to ensure that settlement is equitable over all shippers. PAC's powers are limited and these and the techniques they may apply need to be strengthened.

UNC 0674, the equivalent mod in the UNC, has been developed over a long period and is now close to reaching its conclusion.

The intent of this modification is to amend the code to ensure that settlement performance requirements under the UNC and therefore the IGT UNC would fall under the Performance Assurance regime described and governed in the IGT UNC. The modification proposes to introduce a Performance Assurance Objective and principles such as not impacting the objective, through doing or not doing acts, even if those are not specifically identified within the Code.

Panel members queried what will change as a result of putting this in the IGT UNC. MB explained this would ensure provisions and requirements for settlement accuracy from data provided are reflected in UNC as well as IGT UNC. Furthermore, this will remind Shippers of their obligations across both codes and all meterpoints.

The Panel unanimously agreed that the modification be subject to Authority decision and that IGT138 should be sent to the next Workgroup, scheduled on Friday, 13<sup>th</sup> March 2020, for development.

## 6. Final Modification report

### [IND002F – Update Company Registered Address in Network Code](#)

The Chair indicated that this modification was a housekeeping change. The Pipeline's Individual Network Code still references the old registered address for the company and must be updated with the correct details.

Two responses were received during the consultation and these were both in support of the modification.

The Panel unanimously agreed that this modification should be subject to Fastrack Self-Governance and the modifications was implemented.

## 7. Work group report [IGT130 Applying password protection and encryption to electronic communication](#)

The Chair presented the Panel with the Workgroup report for the modification.

It was noted that the proposer had revised their opinion and amended the modification to indicate that the modification should be subject to an Authority decision rather than Self-Governance, which was their original recommendation. Although aware of this there had been no specific comments about this from the Workgroup. JC was interested to understand the reasons for the Proposer revising their opinion. JC suggested that there were modifications similar to this which had been raised in other codes under self-governance and didn't understand why this would be treated differently. The Chair explained that the modification had received a lot of opposition although no alternate had been raised. Although aware of the route of appeal the proposer had elected to request that the decision be made by the Authority, rather than taking that route. The Proposer felt it would be more efficient with time for the modification to go straight to the Authority.

A Panel member suggested that this modification was not suitable for an authority decision as there was no evidence that indicated that it should be under authority governance. The Chair explained that the IGT UNC anticipates an abuse of the Self Governance route and it was not anticipated that the Proposer might wish their initial recommendation would be reversed.

The Panel indicated that at the initial stage of the modification, it was agreed that it would follow the Self Governance route and queried if the original reasons for the modification being under self-governance still applied. It was suggested the appeals process to be highlighted to the Proposer. The Panel were all in agreement that the modification met the Self-Governance criteria.

Considering these concerns, the Chair queried whether the Panel would like to suspend

the decision on IGT130 until the next Panel meeting or to continue to send the modification out to consultation. The Chair indicated that the Code Administrator could specifically ask for views on whether the modification should be subject to Self-Governance in the covering email.

The Panel unanimously agreed that this modification should be sent out for consultation with an additional and specific request from the Panel for views regarding the governance route.

**20/02-01: Code Administrator to discuss the decision around self-governance and the appeals process with the Proposer.**

**20/02-02: Code Administrator to send out IGT130 for consultation with an additional and specific request from the Panel for views regarding the governance route.**

## **8. Update on Review Group**

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

The Chair provided an update to Panel on RG005. It was explained that there had been some confusion expressed at the workgroup about what was and should be encompassed in the Review Group. It was explained that as currently written the Review Group will identify the consequential changes from the two Significant Code Reviews (SCRs) and determine the legal drafting to be incorporated within the SCR modifications.

The drafting will be designed to be overlaid on the baselined legal text that will be an output from UNC 0708 and the IGT UNC equivalent just raised, IGT137.

Panel members suggested that the work required for modifications IGT137 (Alignment of the IGT UNC to the UNC in advance of Faster Switching) and UNC 0708 (Re-ordering of the UNC in advance of Faster Switching) should be referenced and discussed under the review group RG005 as they are all related .

The Chair explained that the work being done on the modification although related would have varying deadlines and that the purpose of a Review Group is to develop and issue leading to a modification. The modifications have already been raised and will be progressed and implemented within 2020, unlike the modifications for the SCRs which will be implemented in 2021.

It was agreed that the Review Group and the Modification would be combined within a single agenda item on IGT UNC agendas to ensure that they are discussed at the same time. However, the modifications and the Review Group would continue to be stand alone and discrete pieces of work.

## **9. IGT UNC SCR Legal Text Plan**

The Chair indicated that the progress achieved to date will be discussed at the next Workgroup on Friday 13<sup>th</sup> March 2020.

## **10. Audio policy**

The Chair introduced the amended Audio Recording Policy paper that was provided with the pre meeting papers and asked if anyone had any further comments.

CR fed back comments she had received from KD around the text of the Audio Policy.

Principle A - KD's comment "Gemserv may opt to" - although I agree that there is secretariat choice here it is under the approval of the panel and I am not sure this is made clear here. If panel doesn't approve, then the secretariat cannot do this?' The Chair explained that the Panel is being asked to approve the principles under which meetings being held for the IGT UNC could be recorded and what will happen to the recording once obtained. The recordings are only being proposed to assist with accuracy and quality of the minutes and for no other reason.

The Panel deliberated over this initial comment and agreed to support clause (A) as it stands.

Principle C - The text should highlight that attendees will be informed prior to meetings on the agenda if the meeting is to be recorded as well as during the meeting should anyone join the meeting.

The Chair and Panel agreed that this was appropriate. It was discussed that should any parties not wish to be recorded that they should notify Gemserv in advance ideally.

Principles I, F and G should be moved closer Principle B.

However, the panel conceded that they were appropriate where they are.

Principle F references 'in accordance with Gemserv procedures.

Panel Members asked to see the procedures referenced.

The Panel also expressed that a specific service level agreement should be applied for the audio recording to be deleted once minutes are agreed.

The Chair agreed to review and amend the legal text in accordance with their comments. Lastly the panel agreed that a 3 months trial was not needed and that an annual review was appropriate to review its application.

JC indicated that he was aware that the Audio Policy had not been welcomed by the SEC Panel. The Chair agreed to circulate the extract from the minutes of the meeting where this was discussed (assuming that the meeting minutes are not confidential) to Panel Members.

**20/02-03: Code Administrator to amend the Audio Recording Policy in line with the requests made by Panel.**

**20/02-04: Code Administrator to circulate the extract of the SEC Panel minutes where the Audio Policy was discussed.**

**20/02-05: Code Administrator to provide Panel Members with the Gemserv procedures referenced in the Audio Policy**

## **11. Updates on workgroups**

The Chair presented the paper that was circulated to the Panel prior to the meeting, with summaries on all the work group activities. No questions were received

## **12. Authority Updates**

JC stated that on 13<sup>th</sup> February 2020, Ofgem announced that it was undertaking a review to consider the current and future challenges facing GB System Operation to assess whether the right governance frameworks is in place to deliver the UK's net zero emissions target at lowest cost to consumers.

Ofgem will gather insight on current and future System Operation requirements from key stakeholders, this will largely be in the form of interviews held throughout March 2020.

Reference	Date	Action	Owner	Status
20/02-01	28 <sup>th</sup> February 2020	Code administrator to discuss with the proposer of RG005 to include new modification related.	CA	New
20/02-02	28 <sup>th</sup> February 2020	Code Administrator to send out IGT130 for consultation with an additional and specific request from the Panel for views regarding the governance route.	CA	New
20/02-03	28 <sup>th</sup> February 2020	Code Administrator to amend the Audio Recording Policy in line with the requests made by Panel.	CA	New
20/02-04	28 <sup>th</sup> February 2020	Code Administrator to circulate the extract of the SEC Panel minutes where the Audio Policy was discussed.	CA	New
20/02-05	28 <sup>th</sup> February 2020	Code Administrator to provide Panel Members with the Gemserv procedures referenced in the Audio Policy	CA	New
20/01-01	24 <sup>th</sup> January 2020	The Authority representative to provide clarity on the BEIS consultation at the next meeting.	The Authority	Closed
20/01-02	24 <sup>th</sup> January 2020	Code Administrator to provide a high-level plan of the activities that the IGT UNC would be undertaking in the coming months in order to deliver the RCC consequential drafting, along with any risks, issues and mitigations that have been identified	CA	Closed
20/01-03	24 <sup>th</sup> January 2020	Code Administrator to arrange a meeting on 31 <sup>st</sup> January 2020 to provide agree the plan on how the	CA	Closed

20/01-04	31 <sup>st</sup> January 2020	Gemserv to request from Ofgem an extension to the deadline for submission of a plan for the preparation of consequential legal text drafting for the RCC SCR. The proposed revised date for the submission of the plan would be 5 <sup>th</sup> February 2020.	CA	Closed
20/01-05	31 <sup>st</sup> January 2020	Gemserv to prepare a revised version of the plan for the preparation of consequential legal text drafting for the RCC SCR, whereby the revisions incorporate the amendments proposed by the Panel at its meeting on 31 <sup>st</sup> January 2020. Gemserv to share the revised version with the Panel on 4 <sup>th</sup> February 2020 for final comments and approval.	CA	Closed