





IGT UNC Request		At what stage is this document in the process?
<h1>RG005:</h1> <h2>IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements</h2>	<div>01 Request</div> <div>02 Workgroup Report</div> <div>03 Final Modification Report</div>	
Purpose of Request: This Proposal seeks to undertake a review of the IGT UNC with the aim of identifying Consequential Changes required as a result of development of the REC.		
	The Proposer recommends that this request should be assessed by a Workgroup This request will be presented by the Proposer to the Panel on 19 th December 2018.	
	High Impact: Pipeline Users, Pipeline Operators	
	Medium Impact:	
	Low Impact:	

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About this document:


This document is a Request, which was presented by the Proposer to the panel on 19th December 2018.

The Request has been extended for two additional related strands of work and is to be presented to the Panel on 24th January 2020.

The Panel will consider the Proposer's recommendation and agree whether this revised Request should be referred to a Workgroup for review.

 Any questions?

Contact:
Code Administrator

 IGTUNC@Gemserv.co.uk

 02070901044

Proposer:
Chris Barker

 email address
chris.barker@bu-uk.co.uk

 telephone
01359 245705

1 Request

Why is the Request being made?

In November 2015, Ofgem launched a [Significant Code Review](#) (SCR) to move to faster, more reliable and cost-effective switching. Since that time Ofgem have made a number of requests of Energy Sector Codes as part of the on-going work under Ofgem's Switching Programme. This review is designed to capture those requests, as they arise, and consider the impacts on the IGT UNC in their entirety. It is therefore anticipated that new 'work strands' will be added over time.

Scope

The first request came in autumn 2018, when industry codes were asked to identify the consequential changes that would be required as a result of the introduction of the new Central Switching Service (CSS) and the Retail Energy Code. **(Work strand 1)**

The second request came in autumn 2019. Ofgem published the [Retail Energy Code: Technical Specification approach consultation](#). Parties were asked to consider whether there are any IGT UNC specific data items or flows that should also be considered within the approach, beyond the gas data flow catalogues currently available and are there any IGT data items or data flows that are not in the UK Link File Formats that should also be included within scope of the REC Metadata work? **(Work strand 2)**

The third request also came in autumn 2019, with the launch of the [Retail Code Consolidation](#) SCR. Parties were asked to consider the consequential changes / impacts of the consolidation of the Supply Point Administration System (SPAA) and other codes into the Retail Energy Code (REC). **(Work strand 3)**

Each strand of work has been taken separately and independently and added to the work of this Review Request.

Strand 1:

With Ofgem directing the various Industry Codes to review for any consequential changes and impacts to their current state with the development of the REC (Retail Energy Code), the IGT UNC requires a Review Group to assess these potential impacts.

The Review Group will aim to produce a report that will identify the areas of the IGT UNC which are impacted with the introduction of the REC and thus will need to consider the following:

- Areas to transition into the REC, either on their own or alongside UNC obligations;
- Areas to remain in the IGT UNC but require updating as a result;
- Areas of the IGT UNC remaining, but with similar topics transferring away from the UNC. I.e. unique obligations within the IGT UNC which are required to remain so; and
- References between the IGT UNC and UNC codes which may be displaced due to obligations transferring to the REC.

The Review Group would need to be conscious of other codes equivalent consequential change reviews in assessing the areas of impact on the IGT UNC, particularly that of the UNC.



Strand 2:

Ofgem have highlighted that they are developing a new Data Catalogue which will incorporate all metadata governance into one under the REC. This will include the Central Switching Service Interface Specification, the Electricity Data Transfer Catalogue, the Gas RGMA Data Flow Catalogue, the Gas Supplier Data Flow Catalogue and the Gas UK Link Manual.

The Review Group will need to review the IGT UNC (including all ancillary, guidance, process documents and their associated forms) to ascertain if there are any specific data items or flows that should be considered for inclusion within the scope of the REC Data Catalogue.

For the avoidance of doubt Gas Transporter requests governed outside the IGT UNC (such as the GT1 governed through the Energy Networks Association (ENA)) are not within the scope of this review.

Strand 3:

With Ofgem releasing the Retail Code Consolidation Significant Code Review on the 29th November 2019, the IGT UNC requires the Review Group to assess any potential impacts.

The Review Group will need to assess the consequential impacts of the Supply Point Administration Agreement (SPAA) and other retail codes being consolidated into the REC on the IGT UNC.

It is proposed the scope of this review (incorporating all strands) will be the whole of the IGT UNC (including all ancillary, guidance, process documents and their associated forms), its alignment with the UNC and the areas of transition into the REC.

It will be important to consider and assess the areas which will need to remain unique and separate from the UNC's own approach to consequential changes. For example, the IGT bulk registration process, IGT invoicing and, potentially, metering provision.

Impacts & Costs

No direct impacts or costs are envisaged as a result of the proposed work for this review group (i.e. for all strands), but there are likely to be impacts which coincide with the implementation (under different versions) of the REC and as Ofgem's SCRs (Significant Code Reviews) conclude, and the resulting modification/s required to alter the current governance and administrative arrangements are implemented.

Recommendations

Strand 1:

The objective of this request is to produce a recommendation to the IGT UNC Modification Panel whereby the proposal should be referred to a Workgroup as this will enable a thorough and collaborative review of the code and consequential impacts to it as a result of Faster Switching and the introduction of the REC.

Strand 2:

The objective of this request is to recommend to the IGT UNC Panel that this review should be taken forward by Workgroup members to discuss and facilitate the tasks required to review the IGT UNC (including all ancillary, guidance, process documents and their associated forms) to ascertain if there [are](#) any specific data items or flows that should be considered for inclusion within the scope of the REC Data Catalogue.



Strand 3:

The objective of this request is to recommend to the IGT UNC Panel that this review should be taken forward by Workgroup members to discuss and facilitate the tasks required to review the IGT UNC (including all ancillary, guidance, process documents and their associated forms) to ascertain the consequential impacts of the Supply Point Administration Agreement (SPAA) and other retail codes being consolidated into the REC on the IGT UNC.

Additional Information

The Review Group will need to also consider consequential work being undertaken under the UNC for the same reasons and where the two codes can possibly be made to align. Therefore, while the group will be kept separate from the UNC's similar workgroup, there will be a requirement for updates and dialogue between and regarding the two codes.

Parties should be mindful that consequential changes to the IGT UNC may require a legal view.

The group will also need to remain mindful of other consequential change developments, and the timescales associated with them, which may require additional workgroups over and above the normal and agreed schedule. Elements such as:

Strand 1:

- 08/01/19 – IGT UNC Mod Workstream and initial kick off with considerations of key areas to cover
- Mid-January – BUUK and other IGT, and Genserv representatives to carry out a page turn exercise of the IGT UNC to assess areas of consequential change
- Mid to Late January - High level UNC changes to be shared with IGTs
- End of January/Early February - UNC Legal Text draft from Consequential Changes provided to IGT UNC
- 05/02/19 – IGT UNC Mod Workstream with BUUK and Genserv to present initial findings to the group for discussion
- Mid-February – BUUK and other IGT and Genserv representatives to continue with a page turn exercise of the IGT UNC (if second workshop required)
- 18/02/19 – Code representatives to present consequential changes to RDUG, with full requirements of delivery to be clarified by Ofgem (Jon Dixon)
- 02/03/19 – IGT UNC Mod Workstream with group to collate views to be presented at the next Panel meeting
- 25/03/19 – Code representatives to present legal text of proposed changes to RDUG
- End of March – All wrapped up and with final report, changes and legal text to Ofgem

Strand 2:

- IGT UNC data items or flows to be identified for consideration for inclusion within the REC Data Catalogue, and to be provided to Ofgem by the end of March 2020.

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Strand 3:

- As part of the delivery of the Switching SCR, where Supplier switching via Shippers was to be removed from the UNC, the UNC was to be re-ordered for the remaining content. The IGT UNC equivalent review was carried out within Work Strand 1. UNC Modification 0708 was raised to bring forward the re-ordering of the code to Spring 2020, rather than waiting for the re-ordering to be implemented as part of the SCR modification. It has been agreed with Ofgem that the Retail Code Consolidation SCR work for both the UNC and the IGT UNC should be based on the legal drafting of the re-ordered UNC. Consequently, the IGT UNC has a dependency on the availability of baselined text following UNC Modification 0708S – 'Re-ordering of the UNC in advance of Faster Switching' discussions. This is expected to be in March, which will be returning to the UNC Panel in March 2020.
- It is anticipated that the baselined UNC legal text, which will be current at the time of the implementation of both the Faster Switching SCR and the Retail Code Consolidation SCR, will be available. The work of required in the IGT UNC as a result of UNC0708 will be progressed separately from the work required for Strand 3 and under the IGT UNC Modification – 'Alignment to the IGT UNC in Advance of Faster Switching.' and Both modifications will be implemented in 2020. **However, the availability of the baselined legal text for the UNC and IGT UNC for these modifications is recognised as being necessary a dependency on the IGT UNC, for the provision of baselined legal text for the SCR modifications and does NOT fall under the remit of this Review.**
 - It is a working assumption that the baselined UNC legal text for UNC0708, will have been implemented in 2020 and will therefore be current at the time of the implementation of both the Faster Switching SCR and the Retail Code Consolidation SCR.
- Ofgem sent a letter to the IGT UNC Panel in January 2020, describing how they propose to manage the SCR's and modifications which might impact the SCR's, and that might be raised in the interim. The letter also asked how the Panel proposed to identify the requirements on the IGT UNC as a result of the Retail Code Consolidation SCR. The Panel approved a Following the IGT UNC Panel in February 2020, a plan, which was was approved and submitted to Ofgem. This plan also identified risks and issues, with suggested mitigations. **A commitment was made to Ofgem to undertake the work of this is strand 3 of work within that timetable.** The plan, risks, issues and mitigations submitted of which are available in the link below.



Plan for Preparation
of Consequential Leg:

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2 Impacts and Costs

Consideration of Wider Industry Impacts

Impacts

Impact on Central Systems and Process

Central System/Process	Potential impact
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UK Link	<ul style="list-style-type: none"> n/a
Operational Processes	<ul style="list-style-type: none"> n/a

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> n/a
Development, capital and operating costs	<ul style="list-style-type: none"> n/a
Contractual risks	<ul style="list-style-type: none"> n/a
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> IGT UNC obligations may be updated or moved into the REC

Impact on Transporters	
Area of IGT business	Potential impact
System operation	<ul style="list-style-type: none"> n/a
Development, capital and operating costs	<ul style="list-style-type: none"> n/a
Recovery of costs	<ul style="list-style-type: none"> n/a
Price regulation	<ul style="list-style-type: none"> n/a
Contractual risks	<ul style="list-style-type: none"> n/a
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> IGT UNC obligations may be updated or moved into the REC
Standards of service	<ul style="list-style-type: none"> n/a

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	<ul style="list-style-type: none"> n/a
IGT UNC Panel	<ul style="list-style-type: none"> n/a
General administration	<ul style="list-style-type: none"> Less administration due to reduced code size

Impact on Code	
Code section	Potential impact
All sections	<ul style="list-style-type: none"> Some clauses, or entire sections, may be recommended for transition into the REC, either directly or as ancillary documents. With other areas possibly requiring updating

Impact on IGT UNC Related Documents and Other Referenced Documents	
Related Document(s)	Potential impact
IGT UNC Ancillary & Guidance Documents	<ul style="list-style-type: none"> Documentation update/move into the REC
IGT Network Codes	<ul style="list-style-type: none"> Documentation update

Other Impacts	
Item impacted	Potential impact
Security of Supply	<ul style="list-style-type: none"> n/a
Operation of the Total System	<ul style="list-style-type: none"> n/a
Industry fragmentation	<ul style="list-style-type: none"> Separation/change of obligations as conditions moved or updated between Industry Codes

3 Terms of Reference

Background

As outlined above, it is proposed to conduct a review of the IGT UNC and how consequential changes will impact the code with the development of the REC.

Topics for Discussion

- Understanding the objective, which is not to change the intent of code areas, but rather understand and act on consequential changes from the Faster Switching Programme and the REC
- Assessment of alternative means to achieve objective such as areas not to be transferred to the REC but potentially updated
- Assessment of potential impacts of the request
- Benefit of alignment with UNC and assessment of legal text.

Outputs

Produce a Workgroup Report covering each work strand for submission to the Modification Panel, containing the assessment and recommendations of the Workgroup.

Composition of Workgroup

The Workgroup is open to any party that wishes to attend or participate.

A Workgroup meeting will be quorate provided at least two Transporter and two User representatives are present.

Meeting Arrangements

Commented [CB1]: Just a note that Work Strand 1 was only carried out by the IGTs, but Shippers were happy for this approach. May need to change this text in the Terms of Reference.

Meetings will be administered by Gemserv and conducted in accordance with the Code Administration Code of Practice.

4 Recommendation

The Proposer invites the Panel to:

- **DETERMINE** that request RG005 (covering all the work strands) progress to Workgroup for review