



IGT UNC Modification Panel Meeting 20-04

Draft Minutes

Friday 24th April 2020

Teleconference

Attendee		Organisation	Representing	As
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Clare Roberts	CR	Scottish Power	Pipeline User	
Jenny Rawlinson	JR	BUUK	Pipeline Operator	
Cher Harris	CH	Indigo Pipelines	Pipeline Operator	
Victoria Parker	VP	ESP Utilities	Pipeline Operator	
Richard Dakin	RD	E.ON	Proposer's Rep.	Observer
Liam King	LK	Ofgem	Authority	
Kemi Fontaine	KF	Gemserv	Code Administrator	Secretariat

1. Alternates, Observers and Apologies

The Chair welcomed attendees and observers to the IGT UNC Modification Panel meeting. Apologies were received from Kirsty Dudley who appointed Claire Roberts as her alternate.

2. Confirmation of Agenda

The Chair confirmed the items for discussions as outlined in the final agenda and confirmed what would be discussed under AOB in regard to the Urgent UNC Modifications raised due to the COVID-19 lockdown and the response being provided in respect of the Clean Energy Package legislation.

3. Approval of the Previous Minutes

KF confirmed no comments had been received prior to the meeting and the minutes were approved as an accurate record of the meeting.

4. Outstanding actions

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

- It was agreed that action 20/03-01 would remain open and would be discussed later in the meeting.
- The Panel agreed that action 20/03-02 could be closed as the Chair had a discussion with Proposer of IGT130 and a decision would be made at this meeting.

5. Workgroup Reports

[IGT133 - Transition of IGT Theft reporting Into the IGT UNC](#)

The Chair presented the Panel with the workgroup report for IGT133 and summarised the purpose of the modification proposal. The Chair highlighted that the equivalent UNC Mod 0704S (Transporter Theft of Gas Reporting) is subject to a self-governance decision and is currently out for consultation, however, IGT133 would be subject to an authority decision as it is slightly different in that reports will only be produced if the Authority requests them, although Pipeline Operators must be ready to produce the reports if requested.

The Chair reflected on the comments produced by the Workgroup regarding queries and challenges on the governance, the relevant objectives satisfied, the possible impacts of this Modification, how the data would be used, and the legal text.

The Chair stated that the Workgroup recommended that this Modification be sent out for consultation and invited the Panel to add to or discuss the points raised.

The Panel had no further queries and unanimously agreed that this Modification should be sent out for consultation.

[IGT136 – Introducing ‘Performance Assurance Framework Administrator’ as a new user type to the Data Permissions Matrix](#)

The Chair opened discussion around the workgroup report for IGT136 highlighting to the Panel key points in the workgroup report that reflected what the aim of this modification once implemented. The Chair also noted that the UNC equivalent modification UNC707S (Introducing ‘Performance Assurance Framework Administrator’ as a new User type to the Data Permissions Matrix) had been implemented and stated that this modification would be subject to self-governance. The Panel had no further queries and unanimously agreed that modification IGT136 should be sent out for consultation.

[IGT139- Introducing a new User type to the IGT UNC and the Data Permissions Matrix of Electricity System Operator \(ESO\)](#)

The Chair presented the Panel with the workgroup report for IGT139 and reflected that this was a new Modification presented at the last Panel meeting and had been through the Workgroup. The Chair stated the equivalent mod 0715S (Amendment of the Data Permission Matrix and UNC TPD Section V5 to add Electricity System Operator (ESO) as a new User type) had been sent out for consultation and that the aim of this modification was to add a new user type to the data permission matrix and it was subject to self-governance.

The Chair highlighted that the legal text was not available for the Workgroup to review and had been inserted into the Workgroup report and published. The Chair queried if the Panel had any immediate

observations about the legal text and opened this up for discussion. A Panel member noted that the legal text was brief and reflected on the description of the legal entity and whether this data could be obtained through other methods. The Chair explained that the definition for the ESO that was utilised in the legal drafting originated from the definition in the equivalent UNC modification legal drafting. The Chair further explained that the definition would allow the CDSP to have a uniform definition in regard to providing data.

The Panel agreed Parties would be given an opportunity to review the legal drafting during consultation and unanimously agreed that IGT139 could be sent out for consultation.

6. Final Workgroup Report

[IGT30 Applying password protection encryption to electronic communication](#)

The Chair presented the Final Modification Report for IGT130 and asked the Panel if there were any queries as a result of reviewing the document. Panel members queried what the next steps would be for this modification concerning its governance.

The Chair stated that the proposer initially presented the modification with the recommendation that it should be subject to a self-governance decision and amended the modification later to reflect that the modification should be subject to an Authority decision. No Panel decision had been made to amend the modification to be subject to an Authority decision and therefore the modification was still currently subject to self-governance.

The Chair queried whether the Panel viewed that this governance route was appropriate after reviewing the representations.

The Panel members agreed that their initial perception of the modification was clear in terms of the rules and that it would be subject to self-governance, however felt that this clarity had been lost when the proposer changed their recommendation regarding governance. The Chair reiterated that the decision on the governance was not amended in the last Panel meeting therefore had not been changed to Authority decision.

A Panel member acknowledged that this was the Proposer's preferred route due to the perception that any decision on implementation by the Panel would be split between the Independent Gas Transporters (IGTs) and Shippers.

The Chair noted that the Workgroup had accepted the amended recommendation for governance of the mod by the Proposer and summarised that there were five consultation responses in total, one Party was indifferent to the decision, two Parties believed it should be self-governance and two Parties believed it should be subject to an Authority decision.

The Panel discussed what the basis was for the modification to follow the proposer's recommendation, whether it should be subject to an Authority decision and what the default governance position is. Ofgem clarified that following the Code Governance Review 3 by BEIS the

default of any modification is self-governance provided that no material is presented which suggests that the modification should be sent to Authority.

The Chair outlined a response from one of the Parties in support of the modification being subject to an authority decision, which stated that this was due to the modification's legislative links to the General Data Protection Regulations (GDPR) and how its application may impact consumer data. The Party acknowledged that although this could have been perceived as a housekeeping modification, the Party believed an Authority decision was required. Furthermore, the Party recognised the divided views of the Pipeline Operators and Users and with the current unequal weighting of the IGT UNC Panel, that an Authority decision would be a fair and transparent approach for the modification.

The Ofgem representative stated the Authority should not be arbiter on how legislative changes are actioned within the Industry and that this should be decided by Parties.

The Panel agreed that this modification should be subject to self-governance and agreed to implement the modification.

The Panel considered when this modification should be implemented, allowing Industry members time to prepare for the changes introduced in this modification and having an awareness of the current operational difficulties being presented by the COVID-19 lockdown. The Panel agreed that this modification should be implemented in the February 2021 code release.

7. Switching Programs

[IGT137 – Alignment of IGT UNC to the UNC in Advance of Faster Switching SCR Plan](#)

The Chair updated the Panel with regards to IGT137(Alignment of IGT UNC to the UNC in Advance of Faster Switching SCR Plan) and stated that the legal drafting was now available to be reviewed by Parties and provided Parties with the opportunity to offer feedback and raise any queries they might have. The plan is to consider any issues raised and produce the Workgroup report at the next Workstream meeting in May 2020. The Chair explained that the text for modification UNC 0708 (Re-ordering of the UNC in advance of Faster Switching) though not baselined had been used. UNC 0708 has been sent out for consultation, although the legal text had not been reviewed by the UNC Workgroup and therefore there is a risk that the legal drafting may be amended. The Chair stated that the SCR changes for the Retail Consolidation and Faster Switching Significant Code Reviews (SCRs) have been overlaid on the legal text for IGT137 and that of UNC0708 as drafted at the moment.

The Chair confirmed that after speaking to Ofgem it was indicated that it was their preference that the work for the Retail Code Consolidation (RCC) SCR be prioritised and delivered by mid-May 2020, which the Chair believed to be achievable. The Chair explained that the main issue would be engagement and the process of approval in time for the deadline, as there are not many official meetings before the middle of May 2020. The Chair stated that the UNC legal drafting for the Retail Consolidation and Faster Switching was made available at the end of March 2020.

The Chair stated that work on the metering elements within code had not commenced and that there was a lack of visibility concerning what metering provisions were going to reflect under the REC

(Retail Energy Code). Metering is uniquely embedded in the IGT UNC code and the Chair expressed that this may also need to be reviewed by Parties. Therefore, it was difficult to predict when this will be completed.

The Panel members acknowledged discussions around delaying the work being conducted under the Switching programme due to the impacts of COVID-19 and expressed concerns that there was a lack of engagement from industry Parties specifically Shippers in terms of these meetings. The Panel members stated it would be helpful to receive an update from Ofgem if the previously agreed deadlines were still applicable or would be revised.

The Chair confirmed that the SCR timetable for the RCC would remain the same with a deadline in April 2021 and the Faster Switching SCR would move to a revised timetable which would mean these plans being actioned nine months apart, rather than the original three months.

Ofgem explained that although they are delaying and prioritising work due to the impacts of COVID-19, it was anticipated that when this period of uncertainty passes the work can be resumed.

A Panel member highlighted that this may be difficult due to issues within engagement and was concerned this would increase even more during this period instancing the cancellation of some UNC Workgroup meetings.

Ofgem queried if there were any other methods to encourage engagement and encouraged Shippers to come to meetings and complete the work required.

A Panel member noted that a modification about Panel rules was being raised by another Panel member to tackle one engagement issue.

The Chair stated that due to lack of attendees, an IGT UNC Workgroup meeting had also been cancelled. Although quoracy does not apply to Workgroup meetings, not enough Parties would have been there to have a reasonable and balance discussion.

The Panel queried whether the Code Administrator had drafted the one-page informational document (an action from a Workgroup meeting) and whether the timescales could be added to that. A Panel member noted that this would provide Parties with a visual aid and would assist in understanding prioritisation and resourcing while completing the work. The Chair confirmed that this would be actioned.

Action: 20/04-01 The Code Administrator to add timescales to the one-page informational summary of the work under Review Group RG005

The Chair stated that it was likely that the RCC SCR drafting would need to be reviewed outside of the scheduled IGT UNC meetings. The Chair explained that there will also be transitional drafting required.

A transition document will probably need to be introduced for the transfer of switching from UKLINK to the Central Switching Service (CSS), however the CDSP had not identified the requirements at this time. This should be an anticipated requirement for the IGT UNC as well.

8. New Modification

[IGT140: Changes to the IGT Panel Rules](#)

RD presented the new modification IGT140 (Change of the IGT Panel Rules) to Panel members highlighting what was outlined in the modification and why this is currently required under the IGT UNC. The Panel members had queries around the solution and how this could be actioned and applied in meetings, however conceded that these questions would be answered through the Workgroup discussion. The Chair confirmed that the Proposer was anticipating that the modification would be amended as it was developed.

Ofgem queried how this proposal would address the bigger issues around engagement.

The Panel members discussed different reasons for why there is an issue with engagement and highlighted different practical solutions that could be implemented such as 'insight to governance' engagement days.

The Chair queried if the Panel was comfortable with the Proposer's recommendation that the Modification be subject to an Authority decision. The Panel noted that the modification would impact or change code governance and should therefore be subject to an Authority decision.

The Chair stated that she anticipated this modification would take some time to complete at the Workgroup and suggested that the modification would need three meetings for discussion which was agreed by Panel members.

A Panel member stated that they should be mindful of the current challenges of ensuring that there is not only a good level of attendance but also the right people are present at the Workgroup. The work on the Modification will need time and if there is no clear representation at those meetings then this could lead to it being carried over until the right representation is present.

The Chair asked the Panel if they were comfortable for the modification to be sent to the Workgroup for discussion and the Panel unanimously agreed that this should be sent to the Workgroup.

9. Workgroup Summary

The Chair asked the Panel if they had reviewed the circulated summary and if they had any queries. The Panel confirmed they had reviewed the Workgroup summary and had no further queries on the content.

10. Authority Updates

Ofgem summarised letters that had been sent to Network companies and Supplier companies to inform them of regulatory easement during this time. As a reminder, Ofgem expects Parties to identify working issues with regulations early and come forward if it these prevents Parties from focusing on the core objectives of keeping consumers protected, especially the vulnerable, protecting security of supply and protecting the health and safety of colleagues.

The Ofgem representative further highlighted that Ofgem had set out the re-prioritisation of some of their work which will be shared later.

11. AOB

The Chair stated that there had been four urgent Modifications raised under the UNC to provide relief to Shippers as a result of the current circumstances due to the lockdown. The Chair queried whether the Panel had reviewed these modifications which had been circulated before the meeting.

The Chair outlined that two modification had been raised by Shippers and two by Networks and asked the Panel for their views on whether these Modifications were relevant, would need to be mirrored in the IGT UNC and how this would be actioned.

A Panel member identified modifications UNC0721 (Urgent - Shipper submitted AQ Corrections during COVID-19) and UNC0723 (Urgent - Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period) as concerning, explaining that the originator would need to clarify whether they intended to use these in the IGT realm. If IGT supply points are to be excluded, then this is not a concern. The Panel member stated it is for the UNC proposer to clarify how they intended for this Modification to be utilised, whether on all supply points or only GDN supply points. To be applicable on IGT supply points IGT UNC modifications would be needed.

The Chair queried how this can be established while reflecting the urgency timescales of the UNC, as it is unclear whether the CDSP could apply these things separately once implemented. The Panel queried whether it would be expedient to contact the proposer of the Modification directly to obtain clarity on these queries.

The Chair explained that the UNC urgent modifications are a culmination of discussions that UNC Parties have had through the Distribution Workgroup and the CDSP had provided solutions for elements that would have no impact on their processes and systems. Gazprom sponsored the first two modifications, UNC0721 and 0722 (Allow Users to submit Estimated Meter Reading during COVID-19) and a Network has sponsored the UNC0723 and 0724.

The Chair's initial thought was that the uniformity of approach was something Shippers prefer; hence the question on whether it is possible for Code rules to be applied differently for IGT UNC sites from DN sites? Also, would the relief being sought also be obtained on IGT sites if the rules were also changed for IGT sites?

A Panel member stated that considering these changes are not permanent should they be added to a transitional document? The Panel noted that the modification UNC0723 stated that the IGTs should consider raising a mirror modification however this was not highlighted in the other Urgent UNC modifications.

Ofgem clarified that the intention of the ratchet modification was for certain sites where the usages have changed due to COVID-19 lockdown circumstances.

A Panel member stated that a conversation with the CDSP is necessary to establish whether changes will exclude IGTs and if not, what the benefits are to the IGTs. The Chair agreed to contact Xoserve on this to better understand the situation and whether action is needed.

Action: 20/04-02 The Chair to contact the CDSP to determine if the application of the Urgent UNC mods will exclude IGTs and the benefits of the mods to IGT sites if applied to them.

The next Modification Panel meeting will take place on Friday, 29th May 2020.

Appendix 1 – Summary of Actions

Reference	Date	Action	Owner	Status
20/04-01	24 th April 2020	The Code Administrator to add timescales to the one-page informational summary of the work under Review Group RG005	CA	New
20/04-02	24 th April 2020	The Chair to contact Xoserve to determine if the application of the Urgent UNC mods will exclude IGTs and the benefits of the mods to IGT sites if applied to them.	Chair	New
20/03-01	27 th March 2020	Code administrator to provide a revised timeline for the progression of the work on switching programme and circulate this to Panel members for consideration and approval	CA	Open
20/02-01	28 th February 2020	Code Administrator to discuss the decision around self-governance and the appeals process with the Proposer	CA	Closed