



## **IGT UNC Modification Panel Meeting 20-03**

### **Final Minutes**

**Friday 27<sup>th</sup> March 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
Kirsty Dudley*	KD	E.ON	Pipeline User	
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	
Jonathan Coe*	JC	Ofgem	Authority	
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. Apologies were received from Liam King and Jonathan Coe was welcomed as the Ofgem representative.

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

The Chair confirmed the items for discussions as outlined in the final agenda and stated that it was Gemserv's intention to withdraw Audio Recording Policy and that this agenda item (8) would not require further discussion. Panel members did not have any other business to raise.

### **3. Approval of the Previous Minutes**

The Chair informed the Panel about the comments received from JR and VP prior to the meeting.

JR queried whether it was accurate that the mod had faced opposition and whether the points raised could be better described as 'challenges'. The Chair and Proposer explained that it had been indicated by the IGT's that they were opposed to the modification in its current state and as such the Panel members agreed that this could remain the same.

JR questioned whether the sentence "A Panel member suggested that this modification was not suitable for an authority decision." accurately reflected the discussion regarding the process of changing the governance of the modification. The Panel deliberated over this point and agreed that this should be removed from the minutes.

JR stated that the following sentence “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.” seemed to be incorrectly phrased as it suggests that the code itself anticipates abuse. The Chair and Panel members deliberated on how this could be amended to clearly reflect what the code stated. The Panel agreed that the text should be amended to ‘The code does not explicitly state the process for changing Self Governance back to Authority Decision’.

JR suggested that the following text should also be included in the final minutes “Panel members did give consideration to the proposer’s preference of reverting the modification from Self-Governance to Authority Consent but agreed with JC’s view in so far as the appeal process would revert the decision to the Authority.” The Panel supported this inclusion to the minutes.

JR stated that the discussion in the minutes needed to reflect that although the recommendation of the Proposer had changed when the mod was amended, that the Panel had not altered its view that the governance of modification IGT130 – Applying password protection encryption to electronic communication should be self-governance rather than an authority decision. So, the governance of the modification remains as self-governance, with a specific enquiry being added into the Consultation about the governance of the mod and whether or not it should be an authority decision.

The Panel agreed that this should be emphasized, that the status had not changed because a decision was not made to change it by the Panel.

VR clarified that her comment was to include within the Audio Policy that Principle D should be amended to clarify that the meeting may be paused at the request of any meeting attendee, and that Principle E should be amended to clarify that not agreeing to be recorded does not preclude that attendee from taking part in the meeting.

The Panel agreed that these amendments could be included in the minutes.

The Chair highlighted that action 20/02-01 was listed incorrectly in the table and was not reflective of the action that was in the minutes themselves and that this would also be corrected.

The Chair asked the Panel that subject to these amendments whether they accepted the minutes as a true and accurate record of the meeting. The Panel unanimously agreed.

#### **4. Outstanding actions**

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

- It was agreed that action 20/03-01 would remain open as the Chair would arrange some time with the proposer in the coming weeks.
- The Panel agreed that action 20/03-02 could be closed as the Code Administrator had sent IGT130 out for consultation.

- Actions 20/03-04, 20/03-05 and 20/03-06 were all related to the audio policy which was to be withdrawn during the meeting and therefore could be closed.

## 5. Switching Programme

[RG005- IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements](#)  
[IGT137 – Alignment of IGT UNC to the UNC in Advance of Faster Switching](#)  
[SCR Plan](#)

The Chair stated that the Switching Programme item on the agenda was a general item which reflected the previous desire for the following items of discussion to be collectively presented and discussed.

The Chair listed the items included as: RG005 (IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements), the SCR (Significant Code Review) Workplan and risk register and the Modification IGT137 (Alignment of the IGT UNC to the UNC in Advance of Faster Switching).

The Chair presented the highlight report for the work (previously circulated to the Panel and Ofgem) on the SCR Workplan which indicated that the plan / work was currently running at a RAG status of red. The Chair explained that this was a summary of the current position as well as what was needed to be actioned next.

The Chair confirmed that Gemserv had updated Ofgem on the current status and position in respect of the plan and confirmed that the IGT's have now given authority to Gemserv to commence the work. JR apologised on behalf of the IGT's for the delay in providing this authorisation.

The Chair explained that the analysis for IGT137, the mod needed in response to UNC 0708 (Re-ordering of the UNC in advance of Faster Switching), had been completed and had been due to be discussed at the previous workstream meeting, which had been cancelled due to attendance issues. Therefore, the legal drafting and its contents had not been reviewed and discussed by Industry Parties.

The Chair stated that the analysis for the SCRs had begun but was using the current version of the legal drafting for UNC 0708, which had not been baselined. Baselined legal drafting was a dependency stated within the plan. The Chair explained that as some of the anticipated risks, considered in the initial stages, had come to fruition, it was highly unlikely that Gemserv would be delivering the legal text for the SCRs by the deadline 31st March 2020 as requested by Ofgem.

The Chair opened the item for discussion and queries. A Panel member queried that as it had been established that Gemserv would not be able to meet the current timeline, had Gemserv produced a revised timeline? The Chair explained that the status on the work was not known at present and that a new timeline would be proposed to the Panel following a meeting with the colleague doing the work.

The Chair noted that the scheduled review of the legal text for UNC 0708 was delayed due to quoracy issues in the scheduled meetings which had led to them being cancelled.

Panel members queried whether a Gemserv representative would be dialling in if the scheduled meetings were to go ahead. The Chair explained that the colleague that had done the work had indicated that all Gemserv's comments had been provide and accepted and that as the IGT's have granted Gemserv the authority to complete the work, these comments would now be credited to the IGTs and Gemserv.

The Chair further expressed that as the re-ordered legal text from UNC 0708 was slightly different from that used for the Faster Switching SCR (that was initially presented to Ofgem last year) as errors, identified through the recent reordering modifications, had been rectified. As Gemserv's comments were accepted, Gemserv is aware of some the changes in the drafting, but not necessarily all.

The Panel queried how Gemserv would proceed if further amendments were made. The Chair confirmed that a change marked version of the UNC0708 legal text would be produced, which would assist in updating for these changes. However, this would introduce another risk.

The Chair indicated that majority of the work around the legal text has been completed by considering drafting that was available in order to provide the legal text for IGT 137, which would ensure that the IGT UNC is still compliant with the reordered UNC. This would then form the basis upon which the drafting for SCRs would be completed.

The Chair updated the Panel on the progression of the draft SCR text under the UNC. The draft had been presented at a high level and discussed at the UNC's Distribution Workgroup (26<sup>th</sup> March 2020). It was highlighted that transitional requirements for the UNC (which will have an impact on the IGT UNC) were still outstanding and that the text for these was anticipated at the end of April 2020.

The Chair noted that Gemserv were still working on the premise that the work was dependent on baselined legal text for UNC 0708. A Panel member indicated that their preference was not to proceed with the option that the SCR drafting would be completed without the UNC 0708 legal text being baselined and noted that this incurred risks. The Panel confirmed that this dependency should remain to avoid the risk that the SCR legal drafting would not marry with the baselined legal text when available. A Panel member also stated that as UNC 0708 was not due to be presented to the UNC Panel until mid-April 2020, it would be more practical for IGT 137 to not be finalised until after the outcome of UNC 0708 was decided.

It was queried whether Gemserv would be confident to complete any outstanding work on IGT137 to coincide with the decision on UNC 0708.

The Chair explained that should the scheduled discussion for the legal drafting on UNC 0708 proceed and go through the necessary discussion with the UNC Workstream and Panel, then this would lead to the provision of the baselined text, although there was a risk that the legal text could be subject to change following consultation.

It was suggested that it may be useful for Gemserv to provide a revised timeline following the Chair's meeting with their colleague doing the work and to circulate this to Panel members to be agreed upon ex-committee.

KD explained that if the decision was needed in the next week, she wanted it to be recorded that she was appointing Clare Roberts as her Alternate, as she would not be available

**20/03-01: 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.**

## 6. New Modification

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

The Chair presented IGT139 to Panel members and stated that this new modification was raised in order to add a new Party to the Data Permissions Matrix (DPM) and align the IGT UNC with the equivalent raised modification of UNC 0715 (Amendment of the Data Permission Matrix and UNC TPD Section V5 to add Electricity System Operator (ESO) as a new User type).

Panel members challenged why the Electricity System Operator (ESO) required direct access to the DPM instead of collaborating with other parts of National Grid which do have access to the data they required. The proposer explained that due to the separation of parts of National Grid this had caused the lines of authority to be unclear which had created a grey area on how that data could be used and shared. Following National Grid's discussion with the Central Data Service Provider (CDSP), the proposer understood that specific access was preferred.

The proposer indicated that this modification was being raised on behalf of National Grid (as it was unable to raise the mod in the IGT UNC itself) and would provide clarification on what data will be accessed and how and why this data will be utilised.

The proposer explained to the Panel that the process of gaining access to the DPM will be changed in future, dismissing the need to apply for a new Party to be granted access. The proposer highlighted that this modification was being raised ahead of the future changes due to the urgent necessity for the data. It is the intention that this mod will not be subject to a standard IGT Code release and instead it would be implemented to align with the implementation of the UNC modification. However, the proposer noted that this would be subject to progress in the workgroup and subsequent consultation. The proposer stated that it was no longer possible to have a joint discussion of the IGT mod with the equivalent UNC mod as the UNC Workgroup discussions on UNC 0715 were concluded at the last UNC Panel meeting. However, the proposer strongly recommended that this modification should be discussed at the IGT Workgroup to clarify and highlight to industry members what the intent of the modification is.

Panel members queried if there was a possibility that the UNC mod will be approved, and the CDSP would not be able to provide them with the full set of data. The proposer conceded that this was a possibility, however E.ON intended to respond to the consultation to UNC 0715 with the recommendation that the implementation should be aligned with the mirror modification IGT139. The implemented mods could then go to the Data Services Committee (DSC) at the same time.

Panel members unanimously agreed that this mod is self-governance and could be sent to Workgroup for immediate completion of the Workgroup Report, the aim being for it to be returned to the April 2020 Panel meeting.

## **7. Workgroup Update**

The Chair stated that as the scheduled Workstream meeting on 13<sup>th</sup> March 2020 was cancelled, so no update was available.

## **8. Audio recording Policy**

The Chair stated that the Code Administrator will be withdrawing the policy to record IGT UNC meetings. It was felt that the benefits of the policy to the quality and accuracy of the minutes would not be balanced with the amount of work that looked likely to be required to manage the operation of the policy. Furthermore, as there is not an established issue with the quality of the minutes, the policy is not a necessity at present.

The Chair clarified that the Code Administrator may bring the policy back to the Panel in the future to be reconsidered if circumstances change.

## **9. Authority Updates**

JC highlighted Ofgem is currently in communication with industry in regard to COVID19 to identify any issues that industry may encounter as result of the Pandemic. Ofgem are working with the government to ensure that industry take the correct precautions with customers especially customers who are deemed as vulnerable. JC stated that all regulatory requirements are still applicable to Licensees, however this will be monitored and industry participants were asked to forward queries or concerns to [Covid19@ofgem.gov.uk](mailto:Covid19@ofgem.gov.uk) if they had any and these will be handled by a dedicated team.

JC stated that Ofgem announced a temporary suspension on publishing from the 25<sup>th</sup> March 2020 for a fortnight. Ofgem are currently reviewing their work plan for 2020 with regards to COVID-19. The only exceptions to this suspension of publishing are publications that Ofgem are legally required to release. The purpose of this is to factor in any impacts that COVID-19 inflicts on Ofgem's work.

## **10. AOB**

- 1) The Chair raised AOB around COVID-19 and queried if Panel members were aware of any issues or impacts that had not been highlighted in previous discussions or would need to be discussed in future.
- 2) The Chair also stated that an update would be provided on what was being discussed in the UNC Panel meeting that was running concurrently with the IGT UNC Panel meeting. The

Joint Office had provided insight in advance of the meeting about a *UNC Modifications Proposed Prioritisation Process* which it was providing to the UNC Panel to facilitate industry discussion.

The Joint Office had a suggested criterion and these were listed by the Chair as being:

- Connected to the COVID-19 Pandemic
- Safety
- Security of supply
- Vulnerable customers
- Legislation and compliance
- Domestic consumers
- I & C consumers
- Performance assurance

The Chair explained that this could possibly have cross code implications and may require the IGT UNC to respond more quickly at times a result.

Force Majeure was also likely to be discussed at the UNC Panel meeting. Force Majeure had been raised at the Distribution Workgroup for the UNC on the 26<sup>th</sup> March and had been deemed to be of a commercial discussion and that the subject matter and discussion would likely breach the Competition Act. The discussion was therefore suspended.

The Panel advised that should any Party wishing to have further discussion on this topic should contact the Code Administrator in the first instance.

The panel deliberated over the possible impacts of Covid19 on future implementations as well as the June release. The Chair stated that there were not any indications that Covid 19 would affect the June release, as the modification(s) to be released had already gone through the process. The Panel members agreed to consider the impacts on IGT modifications dependant on UNC modifications that may be delayed and review this circumstance as this occurs.

A Panel member explained that they had been in discussion with Xoserve and it was established that there were no identified risks affecting Xoserve deliverables.

- 3) A Panel member raised the potential implications of the recent BEIS consultation:

[CONSULTATION ON CHANGES TO STANDARD CONDITIONS OF GAS AND ELECTRICITY SUPPLY LICENCES, CONDITIONS OF THE DCC LICENCE, THE SMART ENERGY CODE, THE UNIFORM NETWORK CODE AND THE MASTER REGISTRATION AGREEMENT](#)

and their later published response:

SMART METERING IMPLEMENTATION PROGRAMME: GOVERNMENT RESPONSE TO JANUARY CONSULTATION ON CODE AND LICENCE CHANGES

It was expected that there would be implications for the UNC and therefore the IGT UNC, through UNC modifications and IGT UNC mirror modifications and it was agreed that an item should be added to the IGT Workgroup agenda to discuss these and what actions might be needed.

**Appendix 1 – Summary of Actions**

Action Reference	Date	Action	Owner	Status
20/03-01	27 <sup>th</sup> 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	New
20/02-01	28 <sup>th</sup> February 2020	Code Administrator to discuss the decision around self-governance and the appeals process with the Proposer	CA	Open
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	Closed
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	Closed
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	Closed

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	Closed
20/01-01	24 <sup>th</sup> January 2020	The Authority representative to provide clarity on the BEIS consultation at the next meeting.	CA	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

**The next Modification Panel meeting will take place on 24<sup>th</sup> April 2020.**