

At what stage is this **Workgroup Report** document in the process? IGT137: Modification Workgroup Report Alignment of the IGT UNC to the **Draft Modification UNC** in advance of Faster Switching Final Modification Report **Purpose of Modification:** This Modification proposes to realign the Independent Gas Transporter Uniform Network Code (IGT UNC) to mirror the Uniform Network Code (UNC) version that is being developed for the Switching Programme in modification UNC 0708 - Re-ordering of the UNC in advance of Faster Switching. This will ensure that the IGT UNC will be consistent with the latest version of the UNC.

The Workgroup recommends that this modification should:

- be subject to self-governance procedures
- proceed to Consultation

The Panel will consider this Workgroup Report on 29th May 2020. The Panel will consider the recommendations and determine the appropriate next steps.



High Impact:

None



Medium Impact:

None



Low Impact:

IGTs, Shippers



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Timetable	01372 587 507

The Proposer recommends the following timetable:	
Initial consideration by Workgroup	13th March 2020
Workgroup Report presented to Panel	29 th May 2020
Draft Modification Report issued for consultation	5 th June 2020
Consultation Close-out for representations	26 th June 2020
Final Modification Report available for Panel	3 rd July 2020
Modification Panel decision	24 th July 2020

Workgroup Comments

The Workgroup noted that the original timetable had not been met and that a new revised timetable would need to be created. The Workgroup noted the new changes and incorporated these into the Workgroup Report.



1 Summary

What

The Ofgem Switching Programme (OSP) was formed to introduce a programme of work to develop a faster, more reliable switching service for gas and electricity consumers to switch Suppliers. A combined gas and electricity Central Switching Service (CSS) has been established to facilitate the Supplier initiated switching process, known as Faster Switching.

In readiness for this, Ofgem directed Transporters to prepare a version of the UNC in advance of the direction for implementation of Faster Switching. This advance version of the UNC includes all the changes that would be needed to facilitate Faster Switching. As part of the work carried out for the Legal text changes, a re-ordering of the UNC was recommended to put the rules into a more logical sequence and ease identification of future CSS/REC changes to the UNC. This change will be implemented through UNC modification 0708- Re-ordering of the UNC in advance of Faster Switching.

A number of areas in the IGT UNC directly reference the UNC and may require amendments to reflect changes to the UNC legal text as a result of UNC0708. Without these changes, references contained within the IGT UNC may become inaccurate.

Why

This Modification seeks to incorporate changes within the IGT UNC which are required to ensure consistency between the UNC and IGT UNC.

How

This modification seeks to update references where necessary in alignment with UNC Modification 0708 – Re-ordering of the UNC in advance of Faster Switching.

2 Governance

Justification for Self-Governance

This Modification is proposing to align specific references of the IGT UNC to mirror the proposed changes of the UNC ahead of Faster Switching. Therefore, this Modification makes no changes to IGT UNC parties' rights or obligations, and has no material impact on competition or IGT UNC governance and therefore, should be considered as suitable for Self-Governance.

Requested Next Steps

This modification should:

- be considered a non-material change and subject to self-governance
- be assessed by a Workgroup.

The Proposer believes that the change mapping should be comprehensively cross checked with developments in UNC 0708.



Workgroup Comments

The Workgroup agree with the proposer that this modification should proceed as Self-governance.

3 Why Change?

Promotes efficiency and consistency in implementation across the codes. Additionally, if this change is not implemented, there is a risk that legal documentation that utilises references contained in the IGT UNC will be inaccurate.

4 Code Specific Matters

Reference Documents

None

Technical Skillsets

Knowledge of the IGT UNC.

Knowledge of the UNC.

5 Solution

This modification proposes to amend impacted references in the IGT UNC to UNC TPD Section B, G, J, and Annex B-3 where necessary to ensure consistency across IGT UNC, UNC TPD drafting and the Ofgem Switching Programme.

Primary actions will be updating references to legal text where required.

Workgroup Comments

The Workgroup agree with the proposed solution and noted that the solution facilitates the intention of the modification.

6 Impacts & Other Considerations

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No impact as it is only re-aligning text.

Consumer Impacts

None. There are no new, amended, or removed obligations that would affect consumers.

Cross Code Impacts

There are no direct cross code impacts from this modification. However, the implementation date of this modification and that of UNC 0708 should be identical to retain integrity of the IGT UNC.



EU Code Impacts

None

Central Systems Impacts

No system changes are envisaged as this is a re-ordering of the existing text only and no obligations are added, changed or removed.

Workgroup Comments

The Workgroup agreed with the proposer, however, acknowledged that under the header 'Does this modification impact a Significant Code Review (SCR)' the modification is driven by an SCR, although does not impact on the business of an SCR.

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:		
Relevant Objective	Identified impact	
(A) Efficient and economic operation of the pipe-line system	None	
(B) Co-ordinated, efficient and economic operation of	None	
(i) the combined pipe-line system; and/or		
(ii) the pipe-line system of one or more other relevant gas transporters		
(C) Efficient discharge of the licensee's obligations	None	
(D) Securing of effective competition:	None	
(i) between relevant shippers;		
(ii) between relevant suppliers; and/or		
(iii) between DN operators (who have entered into transportation		
agreements with other relevant gas transporters) and relevant shippers		
(E) Provision of reasonable economic incentives for relevant suppliers to	None	
secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers		
(F) Promotion of efficiency in the implementation and administration of the Code	Positive	
(G) Compliance with the Regulation and any relevant legally binding	None	
decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators		

The Proposer believes this Modification proposal furthers Relevant Objective F) Promotion of efficiency in the implementation and administration of the Code as it aligns the IGT UNC to match the latest version of the UNC that will be submitted to support the Faster Switching changes.



Workgroup Comments

The Workgroup agree that this modification has a positive impact on Relevant Objective F.

8 Implementation

The implementation date of this modification proposal should align with the implementation of impacted changes to the UNC Transportation Principal Document under UNC 0708.

Workgroup Comments

The Workgroup agreed with the proposer's views on implementation. The Workgroup did acknowledge that there may be challenges in aligning the release to the IGT UNC, considering the UNC Panel will be determining the implementation on their modification ahead of the agreed timetable for this modification. The Workgroup recommends to the IGT UNC Panel that it write to the UNC Panel to consider the IGT137 when determining their dates of implementation.

9 Legal Text

Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

Text

See accompanying documents on the IGT UNC website:

IGT UNC 13.1 Clean Feb 20 release 0708S version 4 Feb 2020.

IGTUNC UNC Cross reference list June 2019 for UNC0708

Workgroup Comments

The Workgroup agrees that the legal text is robust and that parties have sampled the text in varying places to ensure that the new references were accurate. Workgroup members who have carried out analysis have done so without comment. The Workgroup did recognise that no Workgroup members had carried out a full analysis of the proposed text. The Workgroup were however satisfied that the Code Expert had approved the drafting and carried out a thorough analysis prior to submission.

10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

This self-governance modification should proceed to consultation.