

## **IGT UNC Modification Panel Meeting**

### **Final Minutes**

**Friday 29<sup>th</sup> May 2020**

Via teleconference

<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 Users	
Claire Roberts	CR	Scottish Power	Pipeline Users	
Jenny Rawlinson	JR	BUUK	Pipeline Operators	
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Victoria Parker	VP	ESP Utilities	Pipeline Operators	
Liam King	LK	Ofgem	Authority	
Gareth Evans	GE	Waters Wye Associates	Modification Proposer	
Rachel Clarke	RC	Gemserv	Code Administrator	
Kemi Fontaine	KF	Gemserv	Code Administrator	Secretariat

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

The Chair welcomed attendees to the Modification Panel meeting, noting that Gareth Evans (Waters Wye Associates) would be joining the meeting for the discussion on IGT144U as the Modifications Proposer. VP noted that following the tendering of her resignation on the Panel, this would be her last meeting. VP also apologised that she would not be able to attend the full meeting due to a clash.

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

The Chair confirmed the items for discussions as outlined in the final agenda. The Panel were invited to add any items for AOB. The Panel noted no additional items.

### **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.

KF also noted that no comments had been received for the extraordinary Panel meeting held on 14<sup>th</sup> May 2020. These were also 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.

## 5. Workgroup Reports

### [IGT134 – Introducing ‘Research Body’ as a new user type to the Data Matrix and IGT UNC](#)

The Code Administrator presented the Panel with the Workgroup Report for IGT134 and summarised the Workgroup findings and recommendations to Panel. The Code Administrator noted that the workgroup agreed with the proposer’s recommendation that the modification be subjected to self-governance and acknowledge in regard to the solution that similar modifications had been raised prior to enable users to have access, however unlike the previous additions, this would not be providing access to just one party, moreover this would be allowing access to a Collective. The Workgroup noted that this risk was mitigated by the vetting processes carried out in the DSC Change Management Committee.

The Code Administrator outlined the Workgroup’s positive view on the proposer’s suggested Relevant Objectives, noting that the Workgroup anticipated that the Modification would need to be implemented in an extraordinary release as the June release is the same day as the Panel meeting and a November release would potentially halt access for parties.

The Code Administrator highlighted the Workgroup discussion in regards to whether there were currently Research Bodies requiring access to the data, resolving that it would be counterintuitive to competition to delay the implementation of this Modification and recommended that the Panel be pragmatic in their approach. The Code Administrator concluded that the Workgroup supported the legal text and recommended the Panel send this Modification out for Consultation.

The Panel agreed that the Workgroup had sufficiently developed the Modification and the Panel had no further queries. **The Panel unanimously agreed that this Modification should be sent out for consultation for a 15-day period.**

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

The Code Administrator presented the Panel with the Workgroup Report for IGT137 and highlighted that the proposed timetable now differed due to discussions of implementation with the UNC and the impetus to align this with UNC0708. The Code Administrator noted that this would come back to the June Panel meeting for a decision on its implementation, with the view to coincide Implementation dates in late July.

The Chair noted that during a UNC Panel meeting comments had been made in regard to the progression of IGT137. A Panel member noted their disappointment that the IGT Modification was a month behind the UNC. The IGT UNC Panel noted the comment, however resolved that good progress had been made on IGT137 in a challenging timeframe. The Chair noted that the delay was

due to a dependency on UNC legal drafting and a reluctance to use text which not been baselined. The Chair clarified that it was a pragmatic desire for the Panel to process the Modification quickly to avoid new Modifications being implemented within the original and current version of the Code.

The Panel discussed the importance of cross-code working with the IGT UNC and the UNC, including its impacts. The Panel suggested that an item be dedicated to this at the next meeting.

The Code Administrator outlined the Workgroup comments on the proposed solution, Relevant Objectives and implementation confirming that the Workgroup agreed with the proposed outline and acknowledged the challenges around aligning this modification with the equivalent UNC Modification 0708.

Lastly, in regards to the legal text the Code Administrator confirmed the Workgroup believed the text was robust and had reviewed aspects of the text to ensure it was correct, the Workgroup however did acknowledge that although the text had not been critically analysed by a Workgroup member they were aware that the Code Expert and Code Administrator had reviewed this document prior to submission and recommended that this should be sent to consultation.

The Panel had no further queries and agreed with the comments and developments made by the workgroup. **The Panel unanimously agreed that this modification be sent out to consultation.**

**20-05-01- The Code Administrator to add an agenda item on Cross-Code discussion between the UNC and IGTUNC onto the June Panel meeting agenda**

## 6. Final Modification Reports

### [IGT133 – Transition of IGT Theft Reporting into the IGT](#)

The Code Administrator presented the Final Modification Report and summarised the Consultation responses received for this Modification. The Code Administrator highlighted a Consultation response that challenged the proposers recommended governance route of an Authority decision, noting that they did not believe that the Modification met the materiality threshold; the Authority representative supported this challenge. The Panel discussed this response and noted that the solution had differed from the UNC equivalent Modification. Furthermore, the Panel noted that other connected Modifications had progressed as Self-Governance. The Authority and Proposer's representative, Jenny Rawlinson agreed with the challenge, and the Panel unanimously agreed that the Modification revert to Self-Governance.

The Panel went on to discuss the proposed Relevant Objectives before agreeing that the Modification had a positive impact on A and F.

The Panel voted on the drafting of the legal text, and all parties agreed that the legal text facilitated the Modifications solution. **The Panel voted unanimously that this Modification should be**

**implemented and agree the Modification should be included in the scheduled June 2020 release, subject to a 15-day appeal window.**

Further details regarding the consultation results and determinations can be found in the post Panel Final Modification Report linked above.

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

The Code Administrator presented the Final Modification Report for IGT136 and highlighted that a single response had been received which was in full support of the Modification’s implementation.

The Panel reflected on the points outlined in the response and unanimously agreed that the Modification met the criteria set out in Objective Fi and that the legal text facilitated the Modification’s solution. **The Panel voted on the Modifications implementation and unanimously agreed that this Modification should be implemented and included in the scheduled June 2020 release subject to a 15-day appeal window.**

Further details regarding the consultation results and determinations can be found in the post Panel Final Modification Report linked above.

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

The Code Administrator outlined the Final Modification Report for IGT139, noting that three responses were received, one from a Pipeline Operator and two from Pipeline Users. All respondents offered full support for the Modification.

The Code administrator highlighted that respondents believed the modification facilitated Relevant Objective F and not D as the modification simply allows the DSC Change Management Committee to allow the ESO access to data, and therefore does not impact competition between any parties.

Furthermore, the Code Administrator stated that all respondents supported the recommended route of Self-Governance and believed the legal text represented the solution of the Modification.

The Panel reviewed these points and unanimously agreed that the Modification met the criteria outlined in Objective F and agreed that there were no concerns in regard to the legal text. Lastly the implementation of the modification was discussed with consideration of the implications of the implementation not marrying up with the equivalent UNC Modification 0702.

**The Panel unanimously agreed that the Modification should be implemented. The Panel decided that this Modification should be included in the scheduled June 2020 release subject to a 15-day appeal window.**

Further details regarding the consultation results and determinations can be found in the post final modification report linked above.

[IGT144U- Ability to Reflect the Correct Customer Network Use and System Offtake Quantity \(SOQ\) During COVID-19](#)

The Chair welcomed the Proposer to the discussions and the Code Administrator provided a summary of Consultation responses, noting that five responses were received: three responses from Pipeline Users and two responses from Pipeline Operators; three of the respondents offered full support for the Modification, one offered qualified support and lastly one did not support this Modification.

The Code Administrator highlighted concerns raised by respondents around adequate controls being in place for monitoring beyond ensuring that revised SOQs are scaled back on September 30<sup>th</sup>. The respondent noted that a framework is required to ensure SOQ reductions are due to Covid-19 circumstances only and not due to the nature of the site or for those experiencing unrelated reductions such as those due to damages or maintenance. The Code Administrator also highlighted that one of the responses also noted that there had been concerns raised in the responses to the consultation for the equivalent UNC Modification 0725. The Proposer noted the controls set out in the Modification and UNC which include a bottom-line SOQ (the meter readings provided pre COVID will prevent an absolute reduction).

The Proposer acknowledged that costs would increase for other market sectors in terms of transportation and settlement. However, this is the situation the industry finds itself in and costs will be significantly higher if those larger sites go out of business and there is permanent demand destruction. The Proposer acknowledged that the Modification had been raised in a short time to address an urgent situation and that there have been questions raised in the UNC Distribution Workgroup which are currently being worked through.

The Chair noted that an issue has arisen post publication of the IGT UNC Consultation regarding the proposed legal text and that they had been raised at the UNC Panel, where the UNC modification was being considered as the issue was relevant to both codes. The Code Administrator noted that the IGT UNC legal text pointed to the UNC text and therefore mirrored that of the UNC equivalent modification. However, areas of the UNC 0725 and IGT144 Business Rules, appeared to have been omitted from the UNC legal text, and therefore the legal drafting for both Codes did not completely cover the solution as drafted in both modifications. For example there are no obligations placed on any party (the business rule indicates the CDSP) to reverse out the SOQ following September 2020. It was acknowledged by that the current drafting mirrored that of the equivalent UNC modification and noted that work is happening offline between the Code Administrator and the Proposer of UNC0725 to determine if greater clarity is required. The Panel noted the issue and approach to address this. The Panel noted that the clause in the UNC was ambiguous but that it assumed the CDSP would do

the reversal, although this was not clear. The Panel received sufficient assurances from the discussions that this Modification could proceed to the Authority. **The Panel voted on recommending implementation of the Modification and the Panel voted four for implementation and one against implementation.**

**The Code Administrator noted that the Final Modification Report would be sent to the Authority for their decision on implementation.**

## 7. Switching Programme

The Chair presented the one-pager previously requested at the April Panel meeting to illustrate the timeline for the Significant Code Reviews (SCR) over the past two years. Additional commentary has been added by the Chair to this timeline to detail events throughout that time. The Chair outlined which parts of the illustration were referred to by the attached narrative, clarifying that the timeline displayed reflected the work post the launch of the Faster Switching Programme which had happened in 2018. The Chair confirmed that the initial remit of the review was to look at the consequential changes of the Faster Switching SCR drafting, the chair further explained the sequence of events displayed to the Panel.

The Chair highlighted that the diagram took into account that the implementation for the Faster Switching SCR has now changed from the June 2020 to the December 2020. The Chair noted that the RCC (Retail Code Consolidation) SCR implementation date had also been amended and the Panel indicated that this had been amended to 1<sup>st</sup> September 2021.

The Chair confirmed that the document would be circulated and published for the Panel and Workgroup.

**20/05-02: The Code Administrator to publish Switching Program's illustrated narrative and timeline.**

## 8. Authority Updates

The Authority was queried by Chair in regard to the amended timeline for the SCR consultation and agreed to take an action to inform the Chair offline.

**20/05-03 The Authority to provide the updated timeline in regard to the SCR consultation to the Chair.**

## 9. Any Other Business

The Code Administrator stated that Carnie Russell (Last mile Gas) was nominated as a new Panel member to represent the IGTs and will begin attending Panel meetings from next month.

The Chair also noted that it had been implied that more Urgent Modifications were anticipated that the next Panel meeting may be an Extraordinary meeting scheduled at an earlier date.

The Chair declared that there was no further business to discuss and brought the panel to a close

## Appendix 1 – Actions Table

Reference	Date	Action	Owner	Status
20/05-01	29 <sup>th</sup> May 2020	The Code Administrator to add the item of Cross-Code discussion between the IGT UNC and UNC onto the June Panel agenda	CA	New
20/05-02	29 <sup>th</sup> May 2020	The Code Administrator to publish Switching Program's illustrated narrative and timeline	CA	New
20/05-03	29 <sup>th</sup> May 2020	The Authority to provide the updated timeline for the SCR consultation	LK	New
20/04-01	24 <sup>th</sup> April 2020	The Code Administrator to add timescales to the one-page informational summary of the work under Review Group RG005	CA	Closed
20/04-02	24 <sup>th</sup> 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	Closed
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	Open
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	Closed

**The next Modification Panel meeting will take place on 26<sup>th</sup> June 2020.**