












Final Modification Report	At what stage is this document in the process?
<h1>IGT137:</h1> <h2>Alignment of the IGT UNC to the UNC in advance of Faster Switching</h2>	<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p><b>Purpose of Modification:</b></p> <p>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.</p>	
	<p>Panel consideration is due on <b>26<sup>th</sup> June 2020</b></p> <p><i>(delete as appropriate following Panel's decision)</i></p> <p>The Panel determined that this self-governance modification be implemented.</p>
	<p><i>(delete as appropriate following Panel's decision)</i></p> <p>The Panel determined that this self-governance modification should not be implemented.</p>
	<p>High Impact:</p> <p>None</p>
	<p>Medium Impact:</p> <p>None</p>
	<p>Low Impact:</p> <p>IGTs, Shippers</p>

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Timeline		 Any questions? Contact: <b>Gemserv</b>  <b>IGTUNC@gemserv.com</b>  <b>020 7090 1044</b> Proposer: <b>Brandon Rodrigues</b>  <b>brandon.rodrigues@espug.com</b>  <b>01372 587 507</b>
<b>The Proposer recommends the following timetable:</b>		
Initial consideration by Workgroup		13 <sup>th</sup> March 2020
Workgroup Report presented to Panel		29 <sup>th</sup> May 2020
Draft Modification Report issued for consultation		1 <sup>st</sup> June 2020
Consultation Close-out for representations		22 <sup>nd</sup> June 2020
Final Modification Report available for Panel		24 <sup>th</sup> June 2020
Modification Panel decision		26 <sup>th</sup> June 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 (i) the combined pipe-line system; and/or (ii) the pipe-line system of one or more other relevant gas transporters	None
(C) Efficient discharge of the licensee's obligations	None
(D) Securing of effective competition: (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	None
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	Positive
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

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 Consultation

Panel invited representations from interested parties which closed on 22<sup>nd</sup> June 2020. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
BUUK	Support	F - Positive	<ul style="list-style-type: none"> <li>BUUK support the implementation of the IGTUNC to the UNC in advance of Faster Switching; we believe it is necessary to ensure accuracy and consistency between IGTUNC and UNC. It also allows for the broader remit to facilitate Faster Switching and the addition of references to the</li> </ul>

			<p>Central Switching Service (CSS) that allows for Suppliers to make the 'switch' and to the new Retail Energy Code (REC).</p> <ul style="list-style-type: none"> <li>• If this modification is not implemented, BUUK support the Workgroup view that a risk is created and legal documentation using IGTUNC references will be inaccurate.</li> <li>• We agree that this modification should be Self-Governance and that the implementation of this modification should be in line with UNC0708S.</li> <li>• We agree that the legal text supports the intention of the modification following the Workgroup comments that sections have been reviewed by the Workgroup.</li> <li>• Whilst we are comfortable in letting this change progress and recognise its benefits; we can't completely endorse that the legal text fully delivers the intent of the modification as haven't undertaken a comprehensive review.</li> </ul>
Indigo Pipelines	Support	F - Positive	<ul style="list-style-type: none"> <li>• The re-ordering of the UNC taking place under Mod 0708 will invalidate much of the cross referencing that exists in the IGT UNC, therefore it is vital that we re-align the IGT UNC to match the new UNC in order to preserve the integrity of the Code.</li> <li>• This should be Self-Governance modification as it does not alter the rights or obligations on IGT UNC Parties.</li> <li>• Implementation needs to be aligned with UNC0708 and we are satisfied with the Legal text.</li> </ul>
ESPUG	Support	F - Positive	<ul style="list-style-type: none"> <li>• We support this modification as it is essential to retain the accuracy of references in the IGT UNC where these point to the UNC. Given the high level of referencing between the two codes, IGT 137 will need to be implemented to ensure that the IGT UNC is coherent and continues to accurately reference the requisite clauses and terms of the UNC.</li> <li>• As the modification is wholly dependent on the implementation of UNC 0708, we note that IGT137 will have to be implemented on the same date to avoid errors in cross-references of legal</li> </ul>

			<p>text.</p> <ul style="list-style-type: none"> <li>We are satisfied that the legal text work carried out by the code expert will deliver the intent of this modification.</li> </ul>
Scottish Power	Support	F - Positive	<ul style="list-style-type: none"> <li>We support this modification as it will positively impact the relevant objective F and will promote efficiency in the implementation and administration of the Code by making sure that Faster Switching changes made to UNC are easy to identify. This will mean assist in the development of REC.</li> <li>We agree that this modification should be subject to self-governance and we support the implementation of this alongside UNC0708S.</li> </ul>

In Summary:

- Four responses were received to the consultation for IGT137, incorporating three responses from Pipeline Operators and one Pipeline User;
- All respondents offered support for this Modification;
- All respondents agreed that this modification better facilitates Relevant Objective F;
- All respondents agreed that this modification meets the criteria for Self-Governance; and
- All respondents were comfortable that the Legal Text supported the requirements of the solution following Workgroup comments that sections of text had been tested by Workgroup members.

## 11 Panel Discussions

*The Code Administrator will provide a summary of the Panel discussions that inform any decisions taken. This will include a record of Panel's views on the representations, the outcome of any votes and, where alternates exist, Panel's preference.*

### Discussion

Insert text here

### Consideration of the Relevant Objectives

Insert text here

### Determinations

Insert text here



## 12 Recommendations

### Panel Determination Self-Governance

Members agreed:

- that Modification 137 should [not] be implemented