



IGT UNC Modification Workstream Meeting 20-06

Draft Minutes

Thursday 11th June 2020

Teleconference

Attendees		Organisation	As
Anne Jackson	AJ	Gemserv	Chair
Brandon Rodrigues	BR	ESP	
Cher Harris	CH	Indigo Pipelines	
Ashley Frost	AF	Indigo Pipelines	
Jenny Rawlinson	JR	BUUK	
Rebecca Cailles	RC	BUUK	
Kirsty Dudley	KD	E.ON	
Claire Roberts	CR	Scottish Power	
Oorlagh Chapman	OC	British Gas	
Ellie Rogers	ER	Xoserve	
Liam King	LK	Ofgem	For agenda item 5
Rachel Clarke	RCI	Gemserv	Code Administrator
Kemi Fontaine	KF	Gemserv	Code Administrator

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting. No apologies were received, and the Code Administrator noted that Ofgem would be dialling in for item five (IGT140 discussions).

2. Confirmation of Agenda

The Chair confirmed the items for discussion as outlined in the final agenda and confirmed items that would be discussed under AOB concerning; Modification UNC0691 (CDSP to convert Class 2, 3 or 4 Supply Meter Points to Class 1 when G1.6.15 criteria are met), UNC0726U (COVID-19 Liquidity Relief Scheme for Shippers), implications of UNC0665 (Changes to Ratchet Regime) and UNC0710 (CDSP provision of Class 1 read service). The Chair also noted that OC would be discussing the Must-read process and the implications on this during COVID-19.

3. Approval of Previous Minutes

The Code Administrator confirmed that no comments were received prior to the meeting. The minutes were accepted as a true and accurate reflection of the discussion.

4. Outstanding actions

Outstanding actions were outlined by the Code Administration and the Workgroup were updated on the following actions. A full list of actions can be found in Appendix 1:

WS 20-05-03 -The Code Administrator confirmed that this action could be closed as this FS SCR diagram has now been published on the IGT UNC website, both under the RG005 and May Workgroup pages.

WS 20/04-02- The Chair confirmed that CS and VS were still documenting the process. The Chair noted that the Code Administrator will follow up with both parties to make them aware that there will be an expectation that an update is provided to the July Workstream meeting.

5. Switching Programme

The Chair updated the Workgroup on the current work around the Faster Switching (FS) Significant Code Review (SCR). The Chair noted that the Switching Programme illustration (created by the Code Administrator) has now been added to the IGT UNC website. It has been confirmed by the Authority that the timetable for the Code Consolidation (CC) SCR has moved from the original date of April 2021 to September 2021. The Chair also highlighted that the date for the FS SCR implementation had moved from June 2021 to December 2021, which meant a 3-month difference in commencement in part due to COVID-19.

The Chair highlighted to the Workgroup that RG005 (IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements) had three 'strands' of work to complete. The Workgroup had reviewed work for strand one and three within the review group, however, strand two had been largely untouched except for a previous presentation from Ofgem in 2019.

The Chair highlighted the discussion in the previous Workgroup concerning this strand which will include MetaData, data provisions and what the expectations were in terms of the data handling within the REC (Retail Energy Code). The Chair stated that the REC was to be a custodian of a central depository of data across the gas industry.

The Chair highlighted that Andrew Wallace (Ofgem) had informally requested Codes to flag any items of data within their Codes which should be included within the Central Depository. The Chair confirmed that this did not mean the IGT UNC would be relinquishing control of its data, this is purely for the information to be recorded under the REC in a directory.

The Code Administrator presented a spreadsheet detailing the findings of an initial scoping of the Code and its Ancillary Documents to determine areas which may come under MetaData. The Code Administrator highlighted the Ancillary Documents identified from which data items could possibly be subsumed into the REC. These were the:

- 'Pipeline Operation Standards of Service Query Management – Operational Guidelines',
- 'IGTs New Connections Domestic Sites Only',
- 'IGT Non-Domestic New Connections Ancillary Document' (PSR processes) and the
- 'CSEP NExA Table'.

KD noted that the 'IGT Transportation Charges Invoice Template Document' would most certainly come under the MetaData scope as this contained some vital data items within its processes. The Code Administrator also highlighted areas in the Code which may fall under the scope of MetaData. The Code Administrator highlighted Part D - Supply Meter Installation, Part G - Pipeline Transportation Charges, Invoicing, Payment and Code Credit

and Part K - General. KD did not believe this would be incorporated into the Central Depository as this section does not contain any data rather just the permissions of access to the data. The Workgroup resolved to keep this as a possible impact until further analysis can be done.

The Workgroup discussed the dependency of whether the REC only concerned Registration data items and, in this scenario, whether certain IGT UNC data items would be excluded. KD highlighted that from early discussion with Andrew Wallace, it was indicated that this would not just include Registration data items, it was meant to provide a holistic view of data. The initial aim was to ensure the use of common language within the industry and, therefore, would include everything. It was noted this has not been presented for some time and clarification was needed on whether the scope had changed.

The Workgroup members conceded that clarification was needed to ensure understanding of what is affected by the REC and noted that similar discussions were being had in other Codes concerning what data would need to be included.

BR highlighted that discussions related to strand two were being held in the DSC contract and indicated that these discussions focused on the mastery of the data items under the specific Codes (UNC or REC) and whether this would mean a slight relinquishing of control of data items. BR highlighted that a workshop had taken place in the DSC Contract Management Committee (CoMC) which involved parties reviewing data held in the Data Permissions Matrix (DPM) and establishing which would be incorporated into the REC under MetaData.

The Chair clarified that parties should participate in the DSC discussions in order to impact assess any IGT specific impacts.

The Workgroup queried whether this analysis would be published, and the Code Administrator resolved to add more detail into the piece and add the drafted analysis to the IGT UNC website under the RG005 page.

Modification Workgroups

6. IGT131 – Automatic updates to Meter Read Frequency

The Chair noted the current status of the equivalent Modification within the UNC and confirmed that no update was available to discuss at this meeting as the appeal was still being handled by Ofgem.

7. IGT135 – Alignment of the IGT UNC Part K and the Data Permissions Matrix (DPM)

The Proposer's Representative provided the Workgroup with the updated Modification and the 'Data Permissions Matrix Conditionality document'. ER outlined the amendments and highlighted the timetable which requires updating to ensure alignment with the equivalent UNC Modification (UNC0697S). In regard to the Modification, ER stated that to avoid the need to raise multiple 'Mop up' Modifications it is assumed that the additions to the DPM currently going through the process (Research Bodies, Performance Assurance Framework Administrator and ESO) are implemented by the respective Panels and are therefore included in the latest drafting of this Modification.

ER noted that the UNC697S was due to be reviewed at the Distribution Workgroup for the next two months before it is presented at the UNC Panel and this will be confirmed at the next Workgroup meeting.

The Chair confirmed that the one outstanding Data Permissions Modification in the IGT UNC (IGT134) is likely to be included in the Extraordinary release at the end of July (to implement IGT137 - Alignment of the IGT UNC to the UNC in advance of Faster Switching) and therefore the UNC timetable should be aligned for parity.

ER summarised the amendments made in the summary section in regard to the approach of the Modification. ER highlighted that the previous Modification would only remove the data item, however, this has been amended to remove the data user as well, as this is to all be included in the DPM and managed by the DSC CoMC. The DPM would then be supported by the DPM Conditionality document which would include the context concerning why parties have access and what they have access to.

KD queried whether a full draft of the Conditionality document would be available with the Final Modification Reports for both Modifications. ER confirmed that there should be a close to final drafting of the document ready for when these Modifications go out to consultation.

JR queried whether this meant that parties were no longer required to raise a Modification within Code to add a new user type. The Proposer's Representative clarified that a Modification would still be required as the relevant clause would be left in both Codes to raise a Modification for new applicants to the DPM as a safeguard. This would ensure that industry would still consult on the Modification. However, these Modifications would not need legal text as all changes would be made in the DSC Change Management Committee rather than the Codes themselves.

The Chair highlighted a scenario where a UNC Modification had been successfully passed by the UNC Panel, however, the IGT UNC Modification was not passed by their Panel, how this would be managed within the DPM. ER indicated that a caveat would be used to specify that the data permissions were not applicable to the IGT UNC Supply Points.

ER highlighted a note in the draft Modification which stated that ETTOS (Electricity Theft Tip-off Service) was not in the IGT UNC but was defined in the UNC, however ETTOS already have access to IGT data. ER noted that further investigation found that this had been highlighted during the RG003 (Review of Data Permissions) and IGT parties were satisfied that the access to data was covered under their SPAA obligations (Schedule 37). ER resolved that additional details would be included in a further draft to outline this.

ER outlined the details of the current solution and clarified the proposed amendments in the IGTUNC Code. ER highlighted the clause that states, 'in the event of inconsistencies the DPM will take precedence' and confirmed this would be removed along with the user type examples in definitions as this was seen to stray from traditional legal text protocols. The Proposer's Representative noted that the selected clauses named in the solution are to be removed and recorded in the DPM and Conditionality document.

ER called attention to the IGT UNC Clause K23.10 (Disclosure of Historic Meter Point Read Information) and noted that the equivalent UNC clause, is to be relocated from Section V to Section M. The Chair noted that this would be captured in the legal text once the UNC text had been published and reviewed.

Lastly, ER highlighted the additional proposed clause in the solution which states that 'The CDSP may only disclose information to DPM User types who are not also signatories to the DSC if they have entered into Third-Party Services Agreements which comply with the Third Party and Additional Services Policy. The CDSP shall, no later than 31 March in each year, publish a report identifying those DPM User types which have a Third-Party Services Agreement in place with the CDSP for the disclosure of information as contemplated by the clause above.'

The Chair queried whether the legal text drafting for UNC0697 was based on the new order of text (as implemented by UNC0708) or whether this has been based on the current Code. The Proposer confirmed it was not anticipated that the re-ordering of the Code would affect the referencing within this Modification, however, ER would check this.

ER presented the DPM Conditionality document and summarised what areas were detailed in the document including user type, access requirements, and exemptions. ER noted that this document will be owned by the DSC CoMC and this would be updated every time a new user is added. It was explained that new applicants apply to Xoserve for access to data via a form which is reviewed at the DSC ChMC.

The Chair drew discussions to a close noting that the Workgroup report may be completed at next month's meeting.

8. IGT138 – Performance Assurance Techniques and Controls

CR presented the amended Modification to the Workgroup on behalf of the Proposer. CR noted that the timetable for the Modification is that the final decision on both the UNC and IGT UNC Modifications will be within a week of each other (UNC0674 will go to the UNC Panel on 15th October with IGT138 going to the IGT UNC Panel on 23rd October 2020). CR noted that the main changes to the Modification were the business rules and presented what these were, supported by a [power point](#) used during a Performance Assurance Committee (PAC), to the Workgroup.

CR outlined the main areas of change in the UNC which were to the Transportation Principal Document V16, the General Terms B4 and the Performance Assurance Framework Document (PAFD) which is governed by the PAC.

CR also outlined that there will be a new and general objective within the Code that parties should work towards fair and equitable settlement. The Modification would give the PAC more authority when performance issues were identified, and it was also noted that an appeals mechanism would be provided. The modification would not provide financial incentives or sanctions, but ultimately the PAC would be able to refer a party to Ofgem with the evidence of non-compliance. It was also noted that the PAC could address any behaviours that impact settlement even if the Code has no specific provisions on the matter. There were questions around the controls on the PAC and whether these would fall to the Panel.

KD noted two areas on which she sought further clarification:

- Business rule iv (PAC to raise Modifications on performance-related proposals) in relation to the controls on the PAC around this provision and
- Business rule x (PAFD contains the PA techniques (inc. peer comparison, referral to OFGEM & appeals) in relation to peer comparisons and whether organisations would be named.

CR noted the questions to take back to the Proposer.

JR queried what appeal mechanisms were included in the Modification on parties who have been directed by the PAC to change. The Chair noted that the Modification provisions did not allow for the PAC to be punitive and that appeals would be connected with the application of a performance assurance technique.

The Workgroup noted the update on the Modification and it was recommended that parties join the discussion for the UNC modification, the next meeting being on 24th June.

9. IGT140 – Changes to Panel Rules

The Proposer presented the amended Modification and the accompanying documentation. KD highlighted that the defined terms had been changed throughout the document to align with those in the IGT UNC. KD noted that more context had been added to the 'Why Change' section following suggestions from the last Workgroup.

KD noted that additional information around the proxy vote concept had also been added to the 'Why Change' section, noting that the mechanism of multiple constituency voting was already used in the Data Services Contract groups. KD presented the SPAA proxy form to the Workgroup as a working example of what the IGT UNC proxy form may look like and include. The Workgroup noted that it was a comprehensive form and would be interested to see a 'mock-up' of an IGT UNC form. KD agreed to create this in time for the next meeting. KD reiterated that this concept is meant to act as a safety net where people cannot join the meeting (for reasons of holiday cover or last-minute changes in availability for example), it is not meant to be an enduring approach to voting as that could impact the ability for Panel to have meaningful discussions.

KD focused on the solution and confirmed that this had not been amended significantly except for the utilisation of the correct term of 'Voting Member'. KD noted that it is still the intention to have the maximum Panel membership as three parties per constituency. However, in the new drafting the Pipeline User minimum will be one with the Pipeline Operator minimum being two. KD noted that this was due to the imminent risk of the Pipeline User constituency falling short of the current quoracy rules.

JR queried why the minimum would not be the same across the two constituencies and noted that the new proposals could mean that IGTs are outvoted in a scenario where there are two IGTs and one Shipper with three votes. KD noted that the risk of IGTs falling short of quoracy rules is not imminent, whereas this risk could well occur in August 2020 when E.ON's term on the Panel concludes. KD noted that since her time on the Panel there has never been less than full representation from IGTs and that as their election process is different to Shippers and carried out outside of Code, it is not appropriate to include this in this Modification. BR added reducing the Pipeline Operator minimum to one would be a fair approach. KD indicated that she understood other's views and welcomed an alternative Modification from the IGTs if they felt there was a strong enough case for this. She reiterated that the IGT minimum would not be reduced to one Pipeline Operator in the scope of IGT138 as the risk of low IGT participation is not imminent.

At this point the Chair intervened in the discussion and brought this point to a close as the Proposer had made their position clear on what would remain in scope of this Modification. The Chair apologised to the Workgroup as she had experienced technical difficulties which meant that she could not be heard in the meeting and noted that she would have intervened in the conversation sooner to clarify positions and move onto the next new point of discussion. The Chair noted that she would work to resolve this issue for the next meeting.

The Workgroup went on to discuss the specifics of the Solution. JR queried the intention of point 1.B.i.2 'If the representatives are unable to agree or the information is not notified in advance of the start of a meeting, the Panel Chairperson will as part of the meeting agenda (standard or reconvened) allocate the multiple votes to a Voting Member prior to any decision being made'. The Proposer stated the aim was to ensure the IGT UNC parties independently choose where the extra votes were allocated, however, in the scenario that this is not possible, the Proposer has outlined a suggestion involving the Panel Chair. This was detailed in the [accompanying document](#) which indicated that a possible solution such as 'names being pulled from a hat' might be performed by the Chair. KD noted that she was reluctant to codify a mechanism as this could be too limiting to the Chairperson.

The Chair noted that the lack of a mechanism could leave the Chairperson open to challenge. A Workgroup member suggested that votes could possibly be given based on seniority of the members on the Panel for example, i.e. the first meeting with a seat empty and the extra vote is given to the longest standing Panel Member in that constituency. The next time the vote would be assigned to the alternative Panel Member. The Workgroup settled on the idea of there being a rota for the third vote in this scenario.

KD presented the accompanying guidance document to the Workgroup, noting that the thinking is that this will not be a codified ancillary document, moreover, it would remain a guidance document and could be amended by the Panel outside of the Modification process at any time.

The Proposer covered off the last of the amendments that were raised in the last workshop meeting. KD welcomed comments back from the Workgroup on the accompanying document as parties had not had to time scrutinise this due to an administration error.

The Chair thanked KD for presenting the Modification and noted that the group should look to start completing the Workgroup report at the next meeting.

ACTION; WS 20/06-01: KD to produce a draft IGT UNC Proxy form for the next Workstream meeting in July.

ACTION; WS 20/06-02: Workgroup members to provide comments on the IGT138 accompanying guidance document to KD by Friday 19th June 2020.

Operational Issues

10. Party Engagement

The Chair proposed that the Workgroup did not cover the Party Engagement discussion due to the meeting running over time. The Workgroup agreed to postpone this until the next meeting.

11. Known Issues Register

The Chair proposed that the Workgroup did not cover the known issues register due to the meeting running over time. The Workgroup agreed to postpone this until the next meeting.

Cross-Code Implications Tracker

The Chair proposed that the Workgroup did not cover the Cross-Code implications tracker due to the meeting running over time. The Workgroup agreed to postpone this until the next meeting.

12. AOB

UNC 0691 CDSP to convert Class 2, 3 or 4 Supply Meter Points to Class 1 when G1.6.15 criteria are met - Chair

The Chair indicated that in the section on Cross Code implications within the UNC mod 0691 it stated that it was anticipated that the legal drafting in the UNC, when inserted, would also be applicable to the IGT UNC because the IGT UNC would already point at the relevant clause. The Chair confirmed that she had reviewed the legal text, which had been published, and that, as drafted, an IGT mod would be required to simply alter a reference so that the solution of UNC0691 would be reflected properly in the IGT UNC.

However, the Chair had noted that with a simple change in the UNC legal drafting it would be possible for the UNC mod to be implemented in both Codes without the need for an IGT UNC mod.

IGT UNC Workgroup attendees indicated that the next meeting of the UNC0691 would be at the UIG Workgroup being held on Tuesday 16th June and requested that the detail be provided to Loraine O'Shaughnessy, the Chair, to be considered in that meeting.

ACTION WS20/06-03: The Code Administrator to provide the detail of the impact and implications of the legal drafting for UNC0691 to Loraine O'Shaughnessy, Joint Office (JO).

UNC 0710 CDSP provision of Class 1 read service - Brandon Rodrigues, ESP

BR explained that this mod had been raised in the UNC and as the Daily Metered (DM) read provider also provides meter reading for DM IGT sites he expected there to be an impact on the IGT UNC.

The Chair explained that under the IGT UNC the obligation to obtain the readings was on shippers and they are required to make arrangements with the DM read provider. If the DM read provider became the Central Data Service Provider (CDSP) the obligation would not need to change and that shippers would approach the CDSP instead. However, the IGT UNC does provide helpful statements about who the DM read provider is and how and when they should be approached, and these statements would become inaccurate if the CDSP became the service provider. Therefore, these statements would need to be updated. It was assumed that this information was for new shippers / suppliers who may need assistance.

Outside of the remit of the IGT UNC, arrangements would need to be made by the IGT's to ensure that the CDSP would also provide a service for IGT sites so that when approached by Shippers the service would still be provided.

The Workgroup will continue to monitor the progress of this UNC Modification.

UNC 0726 (Urgent) COVID-19 Liquidity Relief Scheme for Shippers - Chair

The Chair explained that in this Urgent Modification in the UNC it explicitly indicated that, as it refers to Large Transporter invoicing, it would not be relevant to IGT's. The Chair explained that the mod has arisen out of discussions with distributors (gas and electricity) under the auspices of the Energy Networks Association and Ofgem, and asked if similar relief might be provided by IGT's, therefore requiring an IGT UNC Modification?

JR explained that the discussions had not included the IGT's and therefore those arrangements were not relevant to them and therefore no Modification was anticipated.

The Chair noted that the UNC mod might actually provide some relief for IGT sites in terms of capacity charging for the transportation element provided by the Large Transporters to IGT sites.

Must Reads – Oorlagh Chapman, British Gas

OC explained that due to the COVID pandemic, suppliers have been experiencing difficulties in obtaining meter readings, which is likely to increase the need for 'must reads' moving forwards. In the IGT UNC there are provisions for the IGT's to obtain meter readings where the 'must read' becomes due and OC asked if, due to the current circumstances, the IGT's had plans to stop this work or delay the work, which would allow Parties time to catch up and obtain the readings themselves.

JR indicated that the IGT's are obligated to obtain the readings in the IGT UNC and are therefore expected to do this and that the work would not be suspended or cease without a Code Modification.

It was indicated that Parties may wish to approach IGT's separately and individually to discuss particular circumstances and arrangements or any party can raise a Modification to address the situation.

UNC 0665 Changes to the Ratchet Regime – Cher Harris, ESP

Unfortunately, CH had already left the meeting, but the Chair indicated that she was aware of the issue and provided the detail.

The Chair explained that UNC0665 was implemented in the UNC last summer. The Modification allows the Large Transporters to identify sites which are classes 2, 4 or 4 which they believe should be class 1 and change them to that class and potentially apply ratchets.

In an IGT Arrangements Document (IGTAD) committee meeting (8th June 2020) a Large Transporter had indicated to the IGT's present that they believed that the mod also gave them the ability to identify potential sites that needed to be reclassified on IGT networks and that these could also be changed to class 1.

The Chair indicated that she had reviewed the Modification, had not identified the legal route by which this was possible and noted that this ability (if possible) was not articulated in the solution of the Modification. The Chair indicated that she had contacted the Transporter who had done the legal drafting for the mod and they were currently reviewing it and would feedback their understanding of what was possible. The Chair will feed back their response in due course.

The next meeting is scheduled for Thursday 10th July 2020.

Appendix 1 – Summary of Actions

Action reference	Action Description	Owner	Status
WS 20/06-01	KD to produce a draft IGT UNC Proxy form for the next Workstream meeting in July.	KD	New
WS 20/06-02	Workgroup members to provide comments on the IGT138 accompanying guidance document to KD by Friday 19th June 2020.	All	New
WS 20/06-03	The Code Administrator to provide the detail of the impact and implications of the legal drafting for UNC0691 to Loraine O'Shaughnessy, Joint Office (JO).	CA	New
WS20-05-01	Code Administrator to identify voting practices with other Codes managed by Gemserv and bring information back to the June meeting for discussion.	CA	Open
WS 20/04-02	CG and VS to draft a Guidance Document on the process for the sale of assets for discussion at the July Workstream meeting.	CG & VS	Open
WS 20-05-02	Code Administrator to complete the Workgroup report for IGT137 and add this to the May Panel Agenda for discussion.	CA	Closed
WS 20-05-03	Code Administrator to amend and publish the drafted one-page diagram for RG005 with a commentary that accompanies the diagram.	CA	Closed
WS 20-05-04	Code Administrator to complete the Workgroup report for IGT134 and add this to the May Panel Agenda for discussion.	CA	Closed