



## **IGT UNC Modification Workstream Meeting**

### **Draft Minutes**

**9<sup>th</sup> July 2020 via Teleconference**

<b>Attendee</b>	<b>Initial</b>	<b>Organisation</b>	<b>Role</b>
Anne Jackson	AJ	Gemserv	Chair
Jenny Rawlinson	JR	BUUK	
Rachel Cailles	RCa	BUUK	
Cher Harris	CH	Indigo Pipelines	Items 1 – 6 only
Claire Roberts	CR	Scottish Power	
Oorlagh Chapman	OC	Centrica	
Kirsty Dudley	KD	E.ON	
Liam King	LK	Ofgem	Items 1-7 & 11 only
David Addison	DA	Xoserve	Items 1-5 & 11 only
Rachel Clarke	RCI	Gemserv	Code Administrator
Kemi Fontaine	KF	Gemserv	Code Administrator

#### **1. Welcomes and Apologies for Absence**

The Chair welcomed attendees to the meeting and advised that apologies had been received from Ellie Rogers (Xoserve) and Brandon Rodriguez (ESPUG). Dave Addison had been named as the Xoserve representative for this meeting.

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

The Chair confirmed Carly Gilchrist (Fulcrum Pipelines) would dial in to present the Asset Guidance paper under agenda item four (Outstanding Actions). RCI also noted that IGT132 (Introduction of IGT Code Credit Rules) would be discussed as AOB. The Workgroup had no further business to add.

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

The Code Administrator advised that no comments were received however, highlighted that there was an error identified within the action table at the end of the minutes recorded in WS20-06/02 which referenced the incorrect Modification. The Workgroup agreed that subject to this amendment these minutes be accepted as a true reflection of the meeting discussion.

#### 4. Outstanding Actions

**20-06-01 - KD to produce a draft IGT UNC Proxy form for the next Workstream meeting in July**

– KF confirmed that this item could be closed as this has been completed and would be reviewed under agenda item six.

**20/06-02 - Workgroup members to provide comments on the IGT140 accompanying guidance document to KD by Friday 19<sup>th</sup> June 2020 – KF confirmed this item could be closed as this would be discussed under agenda item five.**

**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) – KF confirmed this action could be closed.** The Chair updated the Workgroup on the progress of this action. The Chair confirmed that a letter had been sent to Loraine O'Shaughnessy (Joint Office) and following discussions in the UNC Workgroup it was proposed that the legal drafting was to be amended to ensure an IGT modification would not be needed. However from subsequent discussions with the Joint office and Scotia Gas Networks (SGN) it has been indicated that the legal drafting will be amended prior to the next UNC Panel meeting, although the legal text for this Modification had not yet been published.

**20/05-01 Code Administrator to identify voting practices with other Codes managed by Genserv and bring information back to the June meeting for discussion. – KF confirmed this item could be closed as this would be discussed under agenda item six.**

**20/06-04- CG and VS to draft a Guidance Document on the process for the sale of assets for discussion at the July Workstream meeting. – CG summarised the key points of the lessons learned document and highlighted the initial steps taken since the last discussion. This included reviewing and utilising the feedback received on how the network transfer sale had progressed. CG stated that feedback and discussions had been condensed into the following recommendations.**

- Utilising the Code Administrator's distribution list to consistently provide transparent communications to the industry should a Network Asset Transfer take place again; and
- Provide a clear timeline to Industry of how the sale would progress going forward.

CG further noted that an Xoserve change request had been raised by ESPUG to increase the amount of Meter point Reference Numbers (MPRN) that were allowed to be transferred at one time to allow a straightforward transition. CG highlighted feedback that the communication outlining the list of MPRNs to be transferred in the asset sale was helpful, but that there was not enough clarity in regard to other entities connected (for example the transfer of physical meters assets).

KD highlighted that the process did not taken into consideration, the timing of potential changes of supplier (Shipper), therefore, requiring amendments close to the date of the asset sale due to the sites no longer being mastered under that Supplier (Shipper).

CG agreed and stated that it was the intent of the change request to ensure a unified timeline for all assets to be transferred in one go to mitigate the complications found in this instance. KD inquired when this would be processed. CG confirmed that this Change Request was being led by ESPUG and CG took an action to confirmed offline with Vicki Spiers (ESPUG) that this Change request had been raised.

**20/07-01:** CG to confirm that an Xoserve Change request re IGT Asset Transfers has been raised.

CG confirmed that there is a guidance document on the Transfer of Assets which outlined the steps required to transfer MPRNs currently, so another document was not required. It was clarified that this document could be found on the IGT UNC website under Related Documents and it was noted that it was published in December 2017. The Workgroup discussed the validity of this document and concluded that this should be reviewed to ensure it was up to date with the current practises. KD noted that this would have been beneficial to Shippers if this had been included in the communications. KD also queried who was responsible for owning and amending the document.

**20/07-02:** Shippers to review the IGT Change of GT guidance document in light of the recent experience and to ensure it is up to date with current practises.

The Chair clarified that it was the responsibility of the IGT's to ensure communications during the process that informed Industry on how the asset transfer would be actioned. RCI noted that the guidance is not an ancillary document and therefore would be amended by parties outside of IGT UNC governance.

The Workgroup confirmed that there were no further questions on the lessons learned document.

## **Modification Workgroups**

### **5. IGT135 – Alignment of the IGT UNC Part K and the Data Permissions Matrix**

DW summarised the current intention of the Modification and highlighted the following impacts post IGT135 implementation.

- This Modification would remove services and parties requiring data from the UNC and place them in the Data Permissions Matrix (DPM), therefore allowing parties a straightforward process for access.
- This Modification would introduce a Conditionality Document (CD) which would be managed by the DSC Contract Management Committee should a change or access to data be applied for by parties.
- This Modification would remove the following clarifying statement from the IGT UNC and UNC which states "if there is a discrepancy in Code between the DPM (Data Permission Matrix) the DPM would take precedence."

DW presented the amended CD and outlined what would be included within the document. DW highlighted that each of section of this document would encompass the following five data items:

- Organisation details/ recognised role within industry e.g. Meter Asset Providers.
- Background of the company and the request.
- Purpose of access to data.
- Special conditionality.
- The basis on which the data has been released.

DW noted that this was to provide assurance on how data is being released and highlighted a statement in Code which stated, “Parties are required to sign up to a third-party services agreement under the DSC.”

LK queried on the whether the example of Alt Han Company Limited (Alt Han Co) provided in the document was a general representation of how the CD would be applied to all parties. DW explained that Alt Han was unique as they are a stand-alone organisation, and this is more appropriate to a role in the Industry for example a Meter Asset Provider (MAP). LK further queried whether this would also be applied to ‘Research Bodies’.

DW stated that the ‘Research Bodies’ category would not be included in this document as the Proposer anticipated each research body data release element would be on individual occasions during a finite time period to certain relevant parties and this would be connected to a separate template for request of access.

DW outlined the drafting in the CD for a functionality amendment as well as amendments to named parties. DW noted that these would require them to publish Disclosure Request Release forms (DRR) and the CD would be updated following their approval.

DW summarised the Alt Han Co example provided in the Modification and how this had been outlined in the CD under the before mentioned definitions. DW noted that the document also defined why certain data could not be released.

DW highlighted that the Proposer had begun to advise parties which were anticipated to be included in this document. The DSC Contract Management Committee had reviewed the structure of the document and provided approval. The Proposer took an action to provide a fully populated document and to ensure the fully completed document was within the Modification.

The Chair queried whether a separate document would be created for the IGT UNC. DW confirmed that the same document would be provided to both codes, to ensure both Codes were fully informed, however, there would be no difference in the CD provided.

RCI highlighted that the Proposer had previously stated that the clause for allowing access to the Data Permission Matrix (DPM) would still apply in Code, however, no legal text would be included in the Modification or for review in a consultation. RCI queried whether the DRR forms would be included in the Modifications going forward and would this include information that would be outlined in the CD, or would this process be after the implementation of the Code Modification.

DW outlined the current process for receiving a request for data and noted that this would be done in series.

DW noted that looking to the future and in order to future proof the process, discussions have been underway to identify the impact of the Retail Energy Code (REC) on access to data. DW highlighted current discussions on which Codes would master the different data items, either the UNC or the REC. DW confirmed it had been proposed that data items under the IGT UNC and UNC Codes could be processed through an agreed route with the current Contract Committee in which the REC Code Manager would work with Central Data Services Provider (CDSP). However, DW advised it was anticipated this would need to be amended in the SCR drafting due to the timescale in raising a Modification currently and to allow the implementation of a DRR. DW noted that the RECCo may look unkindly on the current processes of access to data through the change process as this can often take upwards of three months.

The Chair highlighted the main concern was that this would result in Modifications being processed without legal drafting and not being outlined in Code. The Chair queried whether the Proposer was comfortable with this approach. DW explained that this would utilise the Modification change process to provide visibility to Industry regardless of Code and highlighted an example of a Class 3 UK Link Modification which had been raised without legal text, using the Change Process as a proxy to ensure parties were aware of the change cost.

KD highlighted a related historic discussion in the UNC regarding this concern in which it had been initially agreed that a Modification would be raised to provide parties with an opportunity to comment and raise their concerns with contract management. However, it was identified that this process should be reviewed in the future to clarify whether a Modification was necessary. DW agreed and indicated that the time for review of this would be the implementation of the REC access matrix as this would aim to approve parties' access to data items that may be under the UNC Code and if a Modification was still required this could delay that process.

KD queried when the Workgroup would be completing the final Workgroup report for IGT135 and the Chair confirmed that this was to be completed at the next Workgroup meeting to ensure alignment with the UNC Modification (UNC0697S). The Workgroup discussed the release date of the two Modifications, and it was highlighted it would be beneficial for the IGT Modification to be released in conjunction with the UNC, although it was highlighted that this may be difficult due to the difference in approach to release dates. It was concluded that this could be discussed and confirmed offline and the Workgroup had no further queries.

## 6. IGT 140 - Changes to IGT Panel Rules

RCI Presented the analysis of differing Codes practises within Gemserv to the Workgroup as requested in the last Workgroup discussion. RCI outlined the results of the analysis on the following practises:

- Proxy votes – RCI confirmed that 4 out of 7 Codes utilise this method.
- Alternates – RCI confirmed that this was utilised by all the Codes in some form.

RCI drew the attention of the Workgroup to the section which reflected Panel minimums and focused on different Codes with a similar structure having two constituencies and highlighted the following:

- Code C required two full members and one from the associate constituency for the meeting to be considered quorate.
- Code E required two Supplier members and one Distribution member.
- Code F required two Supplier representatives and two Provider representatives.

The Workgroup reviewed and discussed the information presented. KD acknowledged that the analysis showed that there was no one uniformed way forward and that each Code created rules that facilitated the Panel business needed. However, in reviewing the outlined practises it did not prompt a change in what the Modification was proposing.

RCa queried whether any of the highlighted methods has been amended in the past or if there were any known issues in their application. RCI confirmed that these methods have been the standards for the last few years, however, could not confirm if there were any known issues. JR queried the reasoning behind Code C Panel minimums in which RCI stated that this would need to confirm offline with its Codes Administrator.

KD presented and outlined the Panel participation analysis and highlighted which organisations which had put representatives forward. This showed a consistency within the IGT UNC representation, showed that E.ON had remained on the Panel for the last 10 years, and that the same four Shipper organisations had spent time on the Panel in this time.

LK noted that Large Transporters appeared on the list, however, it was often claimed that they were not party to the IGT UNC. RCI confirmed they could not be voting members but could attend as observers, in the same way as the consumer representative.

KD summarised changes made in the summary and solution of the Modification following discussions at the last meeting. It was noted that it had been determined to develop an Ancillary Document rather than the previously introduced guidance document as it was a formal document. JR queried whether this be included in the Legal document. KD confirmed that is the proposed way forward, however, as

this was still a draft and an accompanying document, the intention was to review and develop the formal document for the next Workgroup meeting. JR highlighted a point in the document which outlined what was required if the document needed to be changed by Panel majority. JR queried whether a Panel majority decision would be enough for changes to structure. The Workgroup confirmed they were happy with this being a named Ancillary Document, however, it should be clarified that if this is changed in future, whether a Modification will be required.

LK queried when would the legal text be available and KD confirmed that the legal text will be written when the scope is static. The Chair highlighted that there is an added complexity with having two documents saying the same thing where one can be amended by Panel and a party would need to raise a modification to change the other. KD confirmed that the document could link in clauses of the Code to ensure the wording is not directly duplicated. It was noted how it is better to have one document which contains the information instead of having to read two documents side by side.

The Chair presented an example of where the following issue had occurred in the UNC regarding Performance Assurance Committee (PAC) voting requirements. The Chair explained that voting practises were outlined in Code and the Terms of Reference. Subsequently the Terms of Reference were changed which resulted in a conflict. This was due to the ancillary document being amended and not the code. The Chair stated that it would be beneficial to keep this in mind.

KD agreed and explained that it was the aim to make this more user friendly. The Chair suggested that the clauses could be incorporated in the ancillary document to provide context, however, noted that if a change were made in Code this would also need to be applied to this document.

KD outlined amendments made in the 'Why Change' section of the Modification, summarising the changes proposed and what was in scope. KD summarised amendments to the solution that were changed in the scenarios where the parties could not agree on who would be voting and that this be would be resolved via the application of alphabetical order.

KD noted that there were no current provisions outlined in code regarding ex-committee meetings and queried if this needed to be codified. JR queried what decisions would be made in an ex-committee meeting. The Chair stated the type of decisions made in ex-committee meetings at the moment would not be formal decisions recorded in determinations such as modifications.

KD stated that this was introduced to avoid decision making being dragged on and holding up Panel business if a meeting was not quorate. The Chair asked whether it was the intention for this to be added to Code. JR advised that they were not comfortable with determinations being made via email unless it was an exceptional circumstance. KD agreed and clarified it would be at the Chair's discretion and this is in the scenario where every other provision has failed. RCa queried whether this was really needed if there were so many provisions already.

The Workgroup deliberated over how email decisions were utilised in the past and whether this could be applicable in a formal approach and, furthermore, did the Workgroup believe that determinations should be undertaken in a Panel setting only. The Workgroup concluded that this would need to be



clarified. KD resolved to readdress this section of the Modification to add a bullet which stipulated clearly what was in and out of scope for the ex-committee meetings. There were no further comments from the Workgroup.

## **Operational issues**

### **7. Party Engagement Information Paper**

RCI presented the drafted document pinpointing the elements taken from feedback provided in previous discussions and referred back to the February 2020 Workgroup where parties were asked to provide comments in regard to current participation within the Code.

RCI outlined the following suggestions highlighted in red in the document:

- Engagement could be increased through an IGT UNC taster day to inform parties of the practises of the Code and its relation to other codes. Due to the current climate it would be suitable for this to be a virtual event.
- Amend the website to encompass a self-help portal for online resources which could include summaries of meeting discussions, impact groups etc.
- Pre-Workgroup and Pre-Panel meetings which would exclusively cover high profile Modifications and Code reviews.

RCI defined the document as an information paper which reflected varying degrees of engagement from Industry. RCI highlighted that these suggestions would be subject to Panel discussions and discussion with IGTs. Workgroup noted the suggested options and advised that a taster day and accessibility to an information portal on the website would be beneficial and inquired what the next steps would be. RCI proposed that this should be discussed in Panel regarding realistic timescales in order to implement these suggestions.

LK indicated that this should be discussed in conjunction with the Modification IGT140 as although the Modification aims to provide a solution to a very specific issue, it highlights a general lack of engagement with the Code as the modification is lowering the threshold in the rules for the Code to ensure the Code remains functional. LK stated it was unclear how success could be measured if these suggestions were actioned. LK highlighted various steps taken in the past to rectify the issue of engagement with example of the RG004 Review group (Review of IGT Governance and administration arrangements) and Cross-Code discussions. LK indicated that it could be beneficial to further discuss what would the next steps be, if there were indications that the before mentioned suggestions fail.

RCI informed the Workgroup that provisions could be made for engagement, however, agreed that the rate of success was difficult to quantify and noted that it was unclear whether lack of engagement



reflects positively or negatively. This could mean that the Code was independently working well or that the lack of engagement was a detrimental factor.

RCI suggested that the first steps of the taster day would be to go out to industry to gauge whether people were interested. The Workgroup discussed the possible reasons for lack of engagement and considered the main issues of the approach. The Workgroup referred back to a survey which was sent out and reviewed at the February 2020 Workgroup in regard to party engagement. The group reviewed the results of the survey and concluded that although this was from a small sample of the Industry it still reflected an issue of lack of resource and understanding. LK indicated that at some point the Model for engagement would need to be reviewed as the Code requires engagement to function and if that is ineffective then the parties should be thinking of what the wider issues are and solutions there could be to improve this.

The Chair highlighted that this could be measured through having more than one candidate apply for the vacant Panel membership, which would trigger an election process. The Workgroup discussed the monitoring of these issues, which were populated on the known issues register and how the Code Administrators were measuring engagement on the IGT UNC website. RCI noted that web traffic is tracked through the websites analytics and reported to IGTs on a quarterly basis. RCI continued that engagement on the website can be tracked to the number of times the website is accessed, which pages are most commonly used and where the traffic is coming from e.g. Google or directly. KD queried whether these fluctuate with peaked interest in modifications. RCI confirmed that this did appear to be the case noting that during Project Nexus, the web traffic was much higher.

The Workgroup further discussed the experience of parties who were new to the IGT UNC and reflected that upon attending the meeting one could feel intimidated and, therefore, a more fundamental approach was needed.

The Chair concluded that the Workgroup had not yet identified the fundamental issues in engagement in regard to lack of resource and possible perceived lack of value in the current working of the IGT UNC and that a solution had not been agreed. However, parties are still willing to confront the issue with the ideas discussed and, therefore, confirmed the next steps to be a continuation of the discussion in the Workgroup before passing on recommendations to Panel.

## **8. CSEP NExA Table**

RCI presented the new CSEP NExA Table values to the Workgroup. The Chair queried whether the Workgroup had any issues with the presented NExA Table being taken to Panel. The Workgroup did not have any concerns and recommended implementation to the Panel.

The Workgroup discussed the implementation dates of the new table values and whether this needed to be amended to align with the gas year (October). The Workgroup resolved that this should be discussed at Panel and that a modification would need to be raised to amend this.

## **9. Cross-Code Modification Tracker**

RCI presented the new amended draft Cross-Code Modifications Tracker reflecting feedback received when this was last presented to the Workgroup. RCI pinpointed the new features which included the separation of the tracker into different tabs. This main information that is to be discussed at meetings will be contained in one tab, and other tabs include information on review groups and equivalent modifications already raised in the IGT UNC. RCI advised that each page had sufficient commentary to inform participants of the Modifications, but that this could be hidden if the general information were not deemed necessary to discussion.

The Workgroup reviewed the document and commented on whether it was possible to make the document a downloadable feature similar to the Modification Register. RCI noted this and confirmed this would be looked into offline.

RCI provided a summary update of the Modifications outlined in the watchlist briefly highlighting the progression of UNC0691 which the Workgroup were informed of earlier, as well as UNC0710 (Provision of Class 1 Read Service) which had been confirmed would have minimal impact on the Code. RCI highlighted Modification UNC730 (COVID-19 Capacity Retention Process) and confirmed that this was still to be considered as to whether it would affect the Code.

No further queries were received in regard to the update.

## **10. IGT UNC Known Issues Register**

RCI presented the amended known issue register and noted that this has not been discussed for some time due to time constraints on the Agenda. RCI pinpointed updates in terms of highlighted resolved issues and summarised the reason for the amendments including the addition of IGT131 (Automatic updates to Meter Read Frequency) to the register as the progression of this has been halted by the appeal of UNC0692S. The workgroup deliberated and agreed the items which could be closed and kept open. KD noted that party engagement should be added to the open issue page as it is still a work in progress, and this was agreed. The Workgroup also agreed to add legal text drafting in the UNC to the known issues register following on from discussions on UNC0691S.

## **11. RG005- IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements**

The Chair provided the Workgroup with the current status of the Switching Programme project and asked DW about the progress of the Retail Code Consolidation (RCC) SCR drafting within the UNC as the IGT UNC drafting would be based on the UNC drafting. The Chair noted the timetable for the Switching SCR has been deferred due to COVID-19 related matters, however, the parties involved within Ofgem were reverting back to normal and that the Switching Programme activity will soon be back to normal levels. The Chair confirmed that the RCC SCR and the relevant Modifications would

be released in September 2021. The Workgroup deliberated on the implementation of the Faster Switching SCR. The Chair advised that SCR drafting is due to be available for the formal consultation in October 2020, however, some SCR drafting for other codes is currently available for industry to view on Ofgem's website.

DW outlined the status of the UNC SCR drafting and confirmed that amendments had been made to section G, M and section B of the Transportation Principal Document (TPD) which has already been issued to Ofgem. DW confirmed that changes to TPD section V and the GTD were anticipated and outstanding. DW highlighted that the funding that was to be provided by Transporters was being held until all of the COVID-19 specific Modifications had been completed. DW also highlighted that this work was also subject to a response from Ofgem in regard to the concerns around the REC mastering of all data. The Chair highlighted the outstanding work for the IGT UNC and noted that a plan would be discussed offline with DW, however, could not confirm whether this would be without caveats.

KD raised concern that the IGT UNC was at the risk of trailing behind other Codes and highlighted that work was also required for the metering section of the IGT UNC and queried whether this is included in the RCC strand three or whether it will have its own new work strand. The Chair confirmed that metering was to be included in strand three as this was outlined in the Review Group request outline. The Workgroup discussed whether metering should be expanded to its own strand and the impacts of the amendments produced from the implementation of the REC and concluded that until these impacts were identified that metering should remain outlined under strand three.

The Workgroup had no further comments.

## **12.AOB**

RCI highlighted that the new IGT UNC release (June 2020) had been published as version 13.2. RCI reminded Workgroup members that passwords for the provision of information sharing between Shippers and IGTs over email should be updated with every new release.

RCI noted that IGT132 (Introduction of IGT Code Credit Rules) would be added to the next Workgroup following a period of hiatus as the proposer has requested that development continue.

No further AOB was raised by the workgroup.

The Chair thanked attendees for their input and closed the meeting.

**The next Workgroup meeting is scheduled for 13<sup>th</sup> August 2020**

## Appendix A – Actions log

Action reference	Action Description	Owner	Status
<b>WS 20/07-01</b>	<b>CG to confirm that an Xoserve Change request re IGT Asset Transfers has been raised.</b>	<b>CG</b>	<b>New</b>
<b>WS 20/07-02</b>	<b>Shippers to review the IGT Change of GT guidance document in light of the recent experience and to ensure it is up to date with current practises.</b>	<b>All</b>	<b>New</b>
WS 20/06-01	KD to produce a draft IGT UNC Proxy form for the next Workstream meeting in July.	KD	Closed
WS 20/06-02	Workgroup members to provide comments on the IGT140 accompanying guidance document to KD by Friday 19 <sup>th</sup> June 2020.	All	Closed
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	Closed
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	Closed
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	Closed