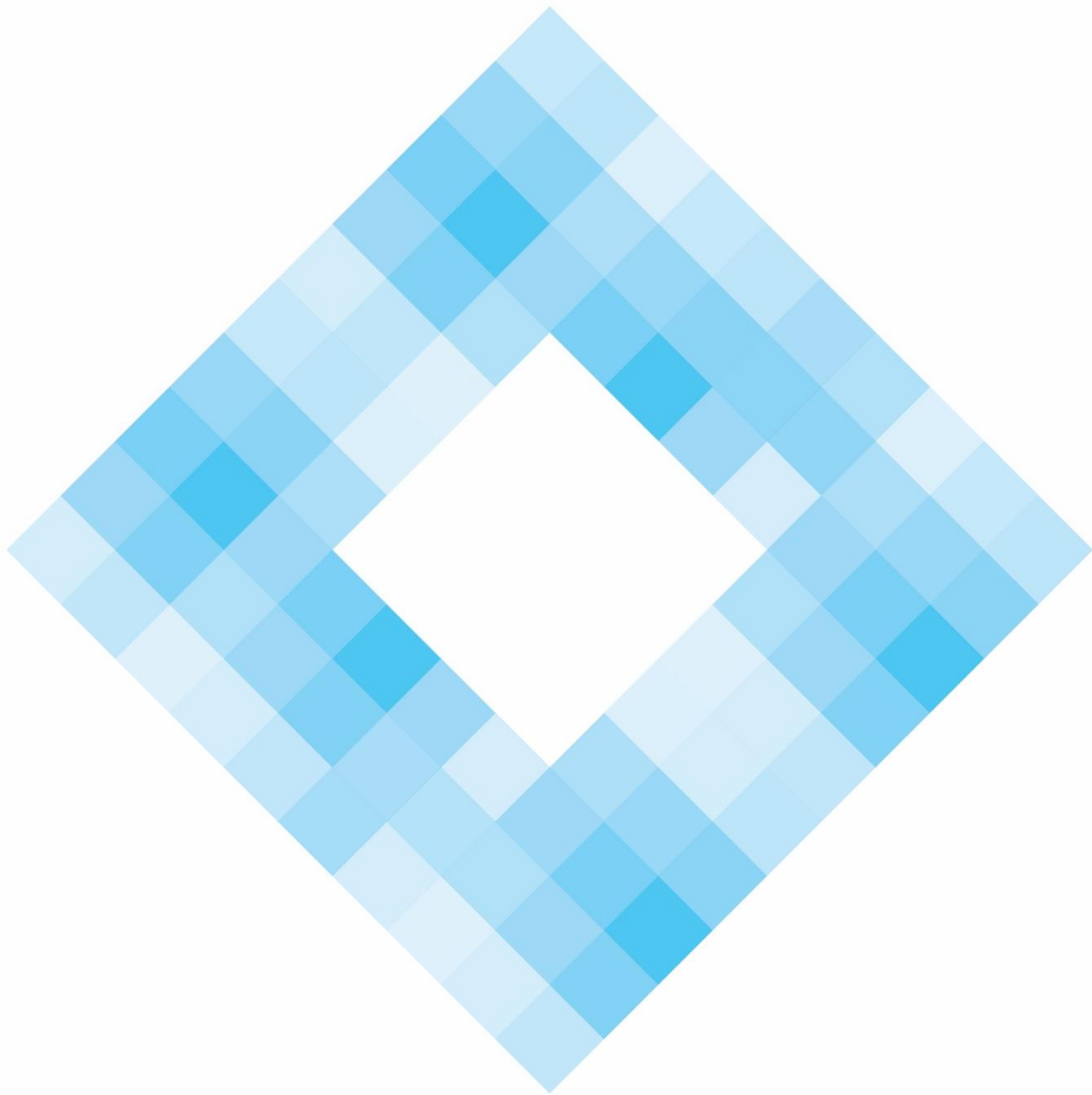


IGT UNC Significant Code Review – Legal drafting progress report

By IGT UNC Code Administrator

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Summary

BACKGROUND

Ofgem are introducing large-scale reforms within the energy industry through two Significant Code Reviews (SCRs) to introduce two new elements into the industry:

- A new Retail Energy Code (REC) which will be introduced under the Retail Code Consolidation SCR (RCC SCR). This is to amalgamate the large and cumbersome retail codes for both gas and electricity to introduce the first dual-fuel retail Code.
- A Faster and more Reliable Switching process for the Industry (FS SCR). As part of the package of reforms taking place within this space the introduction of a new central system for switching customers has been commissioned. The Central Switching Service (CSS) will be introduced under the REC and will now process all customer switches for both gas and electricity, taking the current arrangements down from three week switching to 5 day switching. This ha

This has resulted in all energy codes carrying out internal reviews on areas of consequential changes to accommodate the new reforms. The IGT UNC Code Administrator has been working with industry to identify where changes need to be made to the Code, and RG005 was created to accommodate and develop these changes. On top of these changes the IGT UNC has undertaken a drastic re-alignment of the Code due to the implementation of UNC0708 which say the re-ordering of the UNC brought forward to July 2020. In order to keep the two codes consistent and achieve parity IGT137 was created and implemented by Panel – this has added a layer of complexity to these changes which are explained throughout the document.

Consequential changes within the IGT UNC for FS SCR.

SUMMARY

The IGT UNC went through an extensive review in order to prepare the Code for the consequential changes of the Ofgem Switching Programme and the implementation of the Central Switching Service (CSS) which will move all switching arrangements into its governance. This culminated in the RG005 review group reviewing multiple documents and an eventual drafting of Code which was submitted to the Authority in March 2020 (with a further draft being submitted in June 2020 following more UNC documentation being published). More recently, work has had to be done on this drafting following the implementation of IGT137 (Alignment of the IGT UNC to the UNC in advance of Faster Switching) to ensure that the re-alignment of the IGT UNC has not affected the drafting substantially. It is also critical that following the implementation of UNC0708, the referenced made in this drafting are still accurate. The below section will give a summary of changes made, section by section of the Code, giving a commentary on the detailed changes of the Code. This summary is based on the change marked IGT UNC version 10.9REC dated 5th June 2019, cross referenced with the latest release of the IGT UNC v13.3 (July 2020).

DISCLAIMER:

The consequential changes work that has been carried out as part of this project has assumed that the IGT UNC only incorporates CSS Supply Points, and that non-CSS Supply Points (currently NTS sites) are not applicable to the IGT UNC. Should this working assumption no longer be relevant, such as decisions connected with Shared Supply Points on LDZ Networks, then significant changes will be required to the IGT UNC to introduce the non-CSS Supply Point Registration processes.

Consequential changes on the IGT UNC for RCC SCR.

SUMMARY

The IGT UNC has been reviewed following sight of the current UNC drafting for their RCC SCR changes. At this stage these changes seem to be minimal and a breakdown of this analysis is detailed below. Currently, the rationale around this SCR work is to eliminate any references to SPAA and to add definitions where appropriate to the REC.

REMOVALS

PART H - SYSTEM MAINTENANCE AND PLANNING

There are three references to SPAA MDD contained within this section which had been previously reviewed under IGT124 (Market Participant MDD Migration to UNC Governance from the SPAA). It was agreed at this point to exclude the term SPAA MDD from this Modification in the knowledge that this would be incorporated into this drafting at a later date. The following sections are proposed to be changed to:

34.	Meter Point Status Code	Code identifying the status of the meter point. Per As specified in the RECSPAA MDD.
44.	Meter Manufacturer	Short Code version of meter manufacturer's name for the meter, per as specified in the RECSPAA MDD
46.	Meter Model Code	The model type of the meter- per as specified in the RECSPAA MDD.

PART K - GENERAL

There is currently one reference to SPAA in this section in K23.4 (m) 'To a person appointed pursuant to the SPAA to provide Theft Risk Assessment Service whereby such disclosure shall be in accordance with paragraph 5.5.3(l) of Section V of the UNC'. The removal of this clause has been included in IGT135 (Alignment of the IGT UNC Part K and the Data Permissions Matrix) which sees many of the data permissions removed from the IGT UNC and instead incorporated into a Data Permissions Matrix Conditionality document. We anticipate that this Modification, if passed by Panel, will be implemented prior to this work being carried out, therefore, will not be included in this drafting.

PART M – DEFINITIONS

Two references to SPAA have been found in this section and the following are proposed to be removed;

- **"SPAA"** shall have the meaning ascribed thereto in the UNC; and
- **"Theft Risk Assessment Service"** shall have the meaning ascribed thereto in the SPAA;

ADDITIONS TO CODE

PART L – MODIFICATION RULES

The proposed changes to this section are specifically under the Relevant Person (L10.1). This is to add two additional clauses to L10.1.1 to incorporate RECCo and REC Code Manager. This gives these parties the permissions to make changes to the IGT UNC along with Pipeline Users, Pipeline Operators and Third Party Participants.

PART N – CDSP AND UK LINK

Three references to be added to the IGT UNC under N1.2.1 are below;

- **"REC Code Manager"** means the person or persons to be appointed by the RECCo under the Retail Energy Code and to be known as the 'Code Manager';
- **"RECCo"** means the 'REC Company' established in accordance with the Retail Energy Code;
- **"Retail Energy Code"** means the retail energy code referred to in the DCC Licence.

This gives definitions to those parties that will now have access to data through the CDSP.

Consequential changes on Metering in the IGT UNC

PART D - SUPPLY METER INSTALLATION

There is currently minimal information publicly available to adequately assess the impacts on Metering, however, using what has been published we anticipate minimal changes to this section. We expect to see definitions added to clause 2.1 with the following;

- (e) a "Meter Equipment Manager" has the same meaning as "Meter Asset Manager" and is a defined term in the REC .
- (f) a "Meter Installer" is a person or body that undertakes "Meter Installation Works".

We expect the following to be added to both clause 3 (Provision by the Pipeline Operator) and clause 7 (Updating Meter Information by the Pipeline Operator)

Where the Pipeline Operator provides or has provided the Supply Meter Installation or any part of it and is acting in the role of Meter Equipment Manager or Meter Installer for the purposes of the REC, the Pipeline Operator will adhere to the requirements of the REC. The Pipeline User will represent the Supplier for the purposes of the REC and will provide all Meter Information received from the Pipeline Operator to the relevant Supplier.

A draft version of this legal text has been published on the [IGT UNC website](#).

PART E – METER READING

We suspect that Meter Reading will be included as a retail element and, therefore, subsumed into the REC, although at this time that is not yet clear or confirmed by Ofgem. We can therefore not anticipate the impact on this section of the Code.

