

**IGT UNC Modification Panel Meeting**

**Final Minutes**

**Friday 28<sup>th</sup> August 2020**

**Via teleconference**

<b>Attendee</b>		<b>Organisation</b>	<b>Representing</b>	<b>As</b>
Liam King	LK	Ofgem	Authority	
Kirsty Dudley	KD	E. ON	Pipeline Users	
Claire Roberts	CR	Scottish Power	Pipeline Users	
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Mark Jones	MJ	SSE	Pipeline Users	Proposer of IGT145
Rachel Clarke	RC	Gemserv	Code Administrator	Chair
Bradley Mercer	BM	Gemserv	Code Administrator	
Kemi Fontaine	KF	Gemserv	Code Administrator	Secretariat

**1. Welcomes and Apologies**

The Chair welcomed attendees to the Modification Panel meeting, advising that apologies had been received from Jenny Rawlinson (BUUK) and Carine Russell (Last Mile Gas) who had both appointed Cher Harris (Indigo Pipelines) as their alternate. The Chair welcomed Mark Jones (SSE) to the meeting who would be presenting agenda item six to the Panel as the proposer of IGT145 (Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4). The Chair also noted that Anne Jackson (Gemserv) had sent her apologies for the meeting and therefore the meeting, noting that RC would be Chairing this meeting.

**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 confirmed there were two items of business regarding a new UNC Modification which may impact the Code and the amendment of pronouns within the IGT UNC.

**3. Approval of the Previous Minutes**

KF informed Panel that no comments had been received on the minutes of the previous meeting. The Chair invited Panel to lodge any comments, there were no comments and the minutes were approved as an accurate reflection of the meeting.

**4. Outstanding Actions**

Outstanding actions were reviewed by the Panel and determined that the following actions were to be closed:

**20/07-01** - The Panel agreed that this action could be closed as 'feedback on cross-code working' is to be added to the November Panel meeting for discussion (linked to the progression of 20/07-01 below).

**20/07-02** – The Panel agreed that this action could be closed as it was the intention to discuss the negative and positive elements of cross-code working at the October Workstream meeting.

**20/07-03** – The Panel agreed that this action should remain open in order for Ofgem to deliver the official communications on IGT141U and IGT144U.

**20/06-01** – The Panel agreed to close this action as an agenda item to discuss the implementation of the IGT137 legal text will be added to the October Panel agenda for discussions and the November Panel meeting to close down any issues raised.

**20-06-02** – The Panel agreed this action should remain open as the UNC676R review group on UNC governance has been deferred until early 2021 and the IGT UNC Workstream discussions had not yet culminated in a steer on the identified issues for cross-code working.

***Please see Appendix 1 for a record of the discussion and new actions.***

## **Workgroup Reports**

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

The Chair presented the Panel with the Workgroup Report for IGT135 and summarised the Workgroup findings and recommendations to Panel. The Chair highlighted the proposed timetable and the Self-Governance justification and confirmed that the Workgroup had supported this approach. The Panel had no further comments with regards to the proposed timetable and governance.

The Panel reviewed the proposed solution and discussed the potential impacts. CH highlighted a typographical error within section five of the Modification, the Chair agreed to clarify this with the Proposer in time for the Draft Modification Report to be circulated.

The Chair confirmed that the Workgroup supported that this Modification positively affected Relevant Objective F. The Panel voted on the Workgroup's recommendation to send this out to Consultation. The Panel unanimously agreed that this Modification should be sent out to consultation. The Chair confirmed that the Modification would follow the Self-Governance route and be circulated for a 15-day period. The Chair confirmed that the Final Modification Reports for this and the UNC Modification would be discussed at the October 2020 Panel meetings.

Please find the details for the determinations [here](#).

## **New Modifications**

### **6. IGT145 - Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4**

MJ presented the Panel with the proposed IGT145 Modification and noted that this was an IGT UNC equivalent Modification of UNC664S. MJ noted that UNC664S had been returned to Workgroup following Consultation as there had been several issues outlined in responses with regards to the Change of Supplier process and the implications of the UNC solution on this. MJ noted that the Modification intended to implement an obligation for Shippers to move Supply Points with low Valid Meter Reading submission performance from Classes 2 and 3 into Class 4, following a consecutive period of poor performance. The CDSP will automatically move any Supply Points not moved by the Shipper in such a scenario (after an allowed period of time).

MJ noted that initial thoughts on the UNC Modification were that it would not have an impact on the IGT UNC as the Code pointed over to the UNC at a sufficiently high level. However, following the development of the solution and legal text, it has become apparent that there will be an impact on the IGT UNC.

The Panel discussed that development of this Modification and its relevance to the IGT UNC. KD noted that the IGT145 as it is currently drafted looks more complex than the Solution is as this includes all the information being implemented into the UNC. The Chair noted that many of the Business rules set out in the Solution are UNC business rules, with an additional rule being added for the IGT UNC. The Chair suggested that it may be beneficial and give clarity to parties if the IGT UNC Business rule is brought to the top of the solution and all others are clearly signposted as 'for information only'. The Panel and Proposer agreed with this approach.

The Chair also highlighted that there is more information needed to be added to the Impacts section as the cross-code impacts of this modification had been accidentally omitted.

The Panel discussed whether the Modification required an Authority decision as this did not introduce the same material impacts on competition as the UNC change. The Panel discussed that in light of the discussions it is apparent that this is not an equivalent Modification but an enabling modification. The Chair asked the Panel to vote on changing the Governance from Authority decision to Self-Governance. The Panel voted by Panel Majority to change this Modifications Governance status to Self-Governance.

The Chair asked to Panel whether they agreed to send this to a Workgroup. The Panel voted unanimously to send this Modification to a Workgroup for a maximum of two meetings.

Please find the determinations on the Modification [here](#).

## **Switching Programme Considerations**

### **7. RG005 – IGT UNC Review of Consequential Changes resulting from Faster Switching arrangements**

The Chair provided Panel with updates on the work in progress on the Switching Programme. The Panel was informed that a specific meeting to discuss the legal text for the two Significant Code Reviews (SCR) was scheduled to take place on 14<sup>th</sup> September 2020, it was highlighted that a placeholder had been sent to required attendees. The Chair confirmed an agenda would be developed and issued to attendees on 7<sup>th</sup> September 2020 and the intention is for legal text to be available a week before the meeting for review.

The Chair provided an overview of activity under the Retail Code Consolidation (RCC) workstream advising that Ofgem were yet to provide a specific Metering Retail Energy Code (REC) schedule. KD queried whether this would have been discussed at the Regulatory Design User Group (RDUG) meeting and agreed to liaise with Gemserv representatives for an update. The Chair advised that the Code Administrators were working on the assumption that legal text would need to be inserted to part D and E of the Code. The Chair noted that following the meeting on 14<sup>th</sup> September the finalised legal drafting will be presented to the Panel at their September meeting for sign off. This will then be submitted to the Authority for the upcoming consultation.

The Panel had no further comments or queries.

## IGT UNC Modification Panel Quoracy

### 8. Pipeline User Quoracy following August 2020

The Chair acknowledged that it was KD last Panel meeting and highlighted that despite numerous communications to stakeholders, industry parties, and distribution lists which highlighted the risks to the Shipper community and the disruption of IGT UNC Panel business, that a replacement for KD had not been found. It was highlighted that following the August 2020 Panel meeting that the Panel would not be quorate. The Chair outlined that the contingency plan for such eventualities was to be utilised, which was set out in Part L 6.10 of the IGT UNC. This sets out the mechanism for re-convened meetings where standard quoracy measures would not apply. The Chair noted that this was far from an ideal situation as the Shipper community would only be represented by one vote to the IGTs three.

The Chair explained that the Code Administrator, under its vires in Code, will hold a dummy meeting for an hour from, 08:30 to 09:30 on the same day as the existing Panel meeting. The re-convened Panel meeting would be held at the agreed time of 10:00 and this is to preserve the meeting cycle and afford the Workgroup the same amount of time for their outputs to reach Panel. KD suggested amending IGT140 (Changes to Panel Rules) to urgent to mitigate this issue.

LK advised that the suggested amendment would not provide a solution however, it would accelerate the process of decision making within Workgroup. The Chair highlighted the current timetable which reflected that the Workgroup report could be completed at the September 2020 or October 2020 meeting and agreed that it would be beneficial to reiterate the risks to the Workgroup. KD suggested the governance could be discussed at Workgroup in further detail and indicated that there was no desire to apply urgency to the Modification if it did not provide any benefits. The Chair confirmed that the Code Administrator would continue to advertise the vacancies on Panel.

## Update on Workgroups

### 9. Workgroup Summary

RC presented the Workgroup Summary to the Panel. The Panel had no further queries about the presented Workgroup summary, however, KD acknowledged that this was a useful tool to have on the agenda and praised the Code Administrator for continuing to maintain and report this back to the Panel.

[Please find the link to the Workgroup Summary here](#)

### 10. Authority updates

LK confirmed to Panel that the annual Code Administrator Survey would not be conducted this year. The Chair queried whether this would be re-arranged for a later date in this year or early next year. LK confirmed that the Survey would be carried out in 2021 in the normal timetable.

## 11. AOB

The Chair invited attendees to present AOB.

### **Gendered Pronouns within Code**

KD advised that operational staff within E. ON had flagged that there were instances of gendered pronouns within the code. KD advised that a Modification would be raised to remove the gendered pronouns and make the code gender-neutral. KD queried whether there were any contractual purposes as to why these gender roles would need to remain in code. The Panel suggested that at first thought there were no clear reason for the use of gendered pronouns in the code, however, this should be assessed by a Workgroup to ensure that the clauses concerned are explored fully. It was agreed that a simple translation could be completed via a Self-Governance Modification. The Chair informed Panel that there were less than 50 male pronouns within the Code (he, him, or his references). KD noted that E. ON would raise the change as they had unilaterally approached other codes to raise the same concerns.

### **UNC Modification 743s**

The Chair highlighted a new Modification which had been raised in the UNC, UNC734S (Reporting Valid confirm theft of Gas in Central system) and noted that the timetable for the Modification was swift, with an implementation date targeted for November 2020. The modification looks to introduce a new process to help ensure that valid confirmed theft data, received from Suppliers, is appropriately reported into central systems, including consumption data and AQ corrections. The Chair noted that at this stage it would seem likely that an IGT UNC equivalent Modification would be needed to introduce the same provisions for IGT UNC Supply Points. The Chair highlighted that discussion of this Modification had already begun in the UNC as the Modification had been introduced at the Distribution Workgroup on 27<sup>th</sup> August 2020.

### **IGT138**

CR advised that an amended version of the Modification IGT138 (Performance Assurance Techniques and Controls) would be submitted the Code Administrator imminently as the UNC equivalent change should being submitted to the Joint Office on 28<sup>th</sup> August 2020.

### **KD Service**

The Chair thanked KD for her time on the Panel over the last six years and work she and E. ON have done on the IGT UNC in both the Panel and the Workgroup over that time. This was supported by the other Panel members and Ofgem.

There was no further AOB, the Chair thanked attendees for their input and closed the meeting.

The next IGT UNC Panel is scheduled for 25<sup>th</sup> September 2020.

**Appendix 1 – Actions Table**

Reference	Date	Action	Owner	Status
20/07-01	24 <sup>th</sup> July 2020	Code Administrator to add the item of 'Feedback on Cross-code working' to the agenda for the September Panel meeting.	CA	Closed
20/07-02	24 <sup>th</sup> July 2020	Code Administrator to draft a log of the negative and positive examples of cross-code working between the IGT UNC and UNC to present at the September Workgroup Meeting.	CA	Closed
20/07-03	24 <sup>th</sup> July 2020	Authority to send the official non-implementation notices for the rejected Urgent Modifications IGT141 and IGT144 to the Code Administrator before the August Panel meeting.	LK	Open
20/06-01	26 <sup>th</sup> June 2020	Code Administrator to add IGT137 post implementation discussion onto a future Workgroup agenda (Q4 2020/2021)	CA	Closed
20/06-02	26 <sup>th</sup> June 2020	Code Administrator to draft a one-page document from output developed at Workgroup to be sent to the Proposer of UNC676R governance workgroup to improve cross-code working.	CA	Open