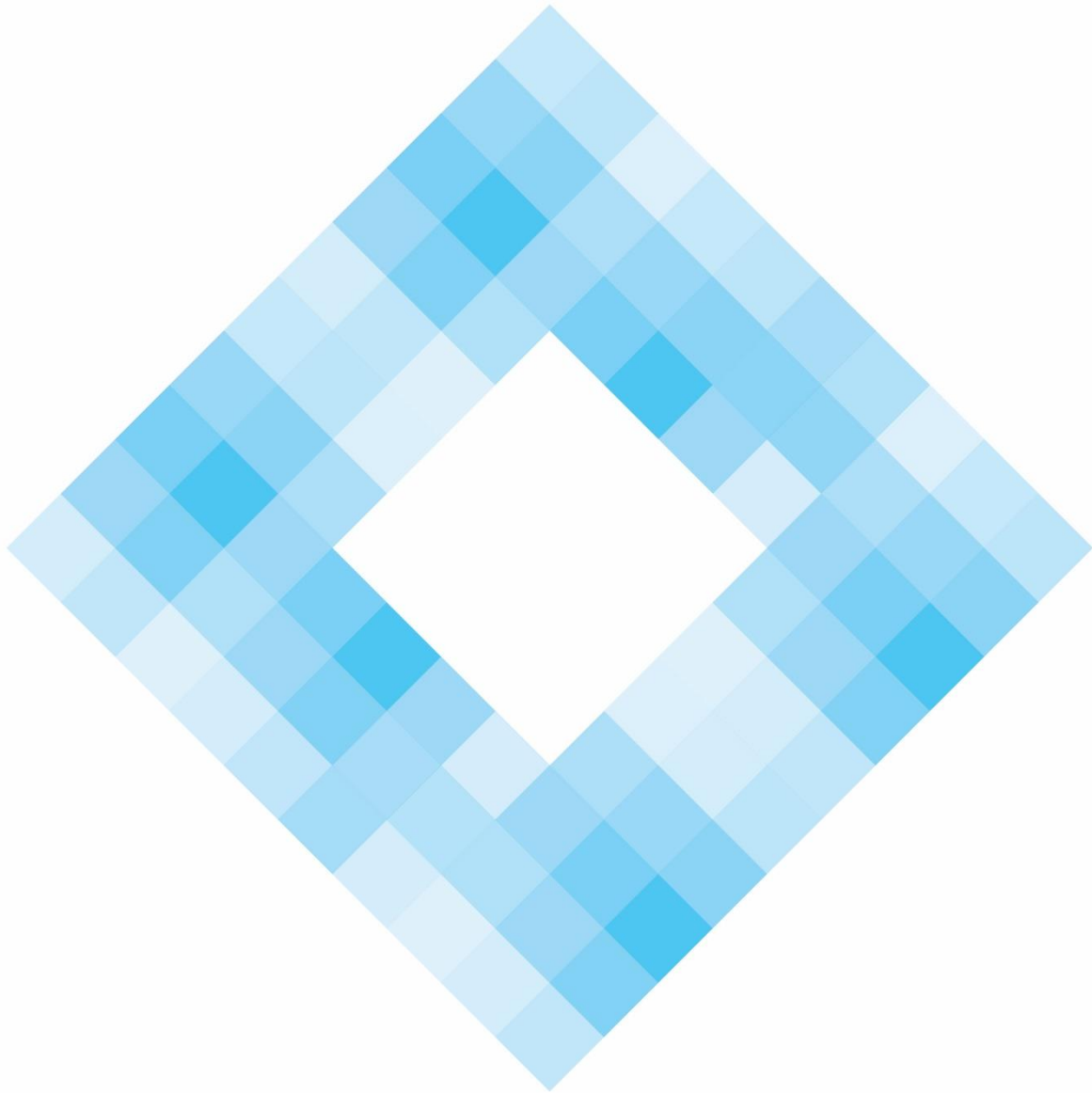


IGT UNC Consequential Changes – Summary Document

By IGT UNC Code Administrator

September 2020



IGT | UNC

Contents

| | |
|--|---|
| Contents | 2 |
| Summary..... | 4 |
| Background | 4 |
| Consequential changes within the IGT UNC | 4 |
| Summary | 4 |
| Part A – Introduction and Interpretation | 5 |
| Part B - CapAcity | 5 |
| Part C – Supply point adminiStration | 5 |
| Part CI – Supply Points | 6 |
| Part CII - DM CAPACITY AND OFFTAKE RATE | 7 |
| Part CIII - INTERRUPTIBLE SUPPLY POINTS..... | 7 |
| Part CIV - SUPPLY POINT DEREGISTRATION AND ISOLATION | 7 |
| Part CV - NEW SUPPLY METER POINTS AND OTHER SITEWORKS | 7 |
| Part D – Supply meter information | 7 |
| Part E – Meter Reading | 8 |
| Part F – Daily and annual quantaties and shrinkage | 8 |
| Part G – PIPELINE TRANSPORTATION CHARGES, INVOICING, PAYMENT AND CODE CREDIT | 8 |
| Part H - SYSTEM MAINTENANCE AND PLANNING | 8 |
| Part I - EMERGENCIES | 9 |
| Part J - DELIVERY AND OFFTAKE OF GAS..... | 9 |
| Part K - General | 9 |
| Part L – Modification Rules | 9 |
| Part M – Definitions | 9 |
| Part N – CDSP AND UK LINK | 9 |
| Consequential changes on the IGT UNC for RCC SCR. | 9 |
| Summary | 9 |

| | |
|--|-------------------------------------|
| Removals..... | 10 |
| Part H - SYSTEM MAINTENANCE AND PLANNING..... | Error! Bookmark not defined. |
| Part K - General | 10 |
| Part M – Definitions | 10 |
| Additions to Code..... | Error! Bookmark not defined. |
| Part L – Modification Rules | 10 |
| Part N – CDSP and UK LINK | 11 |
| Consequential changes on Metering in the IGT UNC | 11 |
| PART D - SUPPLY METER INSTALLATION | 11 |
| PART E – Meter Reading | 12 |

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 2019 (with a further draft being submitted in June 2019 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).

An Additional meeting was held on 14th September to provide a walk-through of the SCR legal text drafting to ensure that Industry had the opportunity to feed into the drafting before it was sent to the IGT UNC Modification Panel for a decision. The hope is that this document acts as sufficient commentary for the Panel to have confidence that this can be sent to Ofgem for inclusion in its industry consultation scheduled for later this year.

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.

PART A – INTRODUCTION AND INTERPRETATION

Minimal changes made to one reference. This change has corrected a point across to an area of the UNC effected by their Codes review.

PART B - CAPACITY

Changes have been made to this section on DM capacity. This looks to keep DM capacity within the IGT UNC. However, the rewording recognises that the term 'Supply Point Confirmation' is no longer applicable.

This section also introduced the new defined term of Deregistration (formally Withdrawal).

PART C – SUPPLY POINT ADMINISTRATION

Extensive changes have been made to this section of the IGT UNC following the complete reorganisation of the equivalent UNC section G. Part CI, CII, CIII, CIV and CV deal mainly with Customer Switching and this has been the main focus of work within the consequential changes Review group in order to move these obligations from the IGT UNC to the new CSS governance arrangements.

Large scale reform has also taken place to restructure across the whole of Part C (CI to CV inclusively), removing large sections of now redundant Code and in some cases moving existing text to more appropriate sections to ensure the logical reading of the legal text.

References to UNC text have been checked to ensure that they are pointing across to the correct part of the reordered code (post UNC0708 implementation). We are satisfied that all references in this section are correct following a rigorous review.

PART CI – SUPPLY POINTS

There has been a swathe of reference changes within this section in order to keep this aligned to the UNC including renaming this section to reflect the registration will no longer be governed under the IGT UNC. New clauses have been added to this section to introduce the Retail Energy Code and the Central Switching Service. Clause 2 recognises the introduction of Annex G-1 in the UNC to record Registration Details to be held on the Supply Point Register

A new section has been added to include ‘Changes in Supply Point classification’.

Clause eight (Supply Point registration) has been extensively changed within the section to point across to the new arrangements within the UNC. Subsequent clauses (9 – 13) have stripped out current IGT UNC processes/obligations and as these are now obsolete.

Sections 10 and 11 which deal with the IGT specific processes for new domestic and non-domestic supply points have been retitled and changes made to recognise the new terminology.

Any areas pertaining to confirmation and withdrawal have either been stripped out (for Domestic premises) or moved to another section for continuity.

Areas have been created (clauses 13 – 20) to introduce the new CSS processes into the IGT UNC, however these all point across to the arrangements set out in the UNC.

References to UNC text have been checked to ensure that they are pointing across to the correct part of the reordered code (post UNC0708 implementation). We are satisfied that all references in this section are correct following a rigorous review. Work has also been carried out in this section to ensure that the correct referencing terms have been used re referencing the IGT UNC or UNC as clarity was sort by the RG005 Workgroup on this section.

PART CII - DM CAPACITY AND OFFTAKE RATE

An introduction section has been added to the Part of the IGT UNC to note 'All references to paragraphs in the UNC refer to paragraphs within Annex-B3 of Section B of the UNC unless specifically started otherwise.'

Various reference changes have been made throughout this section in order to align this to the new UNC text.

PART CIII - INTERRUPTIBLE SUPPLY POINTS

Minimal changes have been made to this section to align new Retail Energy Code defined terms to existing processes. These include 'Referable Registration Nomination' and 'Base Registration Nomination'. Other minor reference changes have been carried out.

References to UNC text have been checked to ensure that they are pointing across to the correct part of the reordered code (post UNC0708 implementation). We are satisfied that all references in this section are correct following a rigorous review.

PART CIV - SUPPLY POINT DEREGISTRATION AND ISOLATION

Major changes have been made to this Part of the IGT UNC following the demise of the Withdrawal process and the introduction of the 'Deregistration' process within the CSS. This has resulted in large sections of the existing Code have been removed and replaced with alternative text incorporating the new processes. The Re-establishment section (6) has also been extended in conjunction with an IGT UNC Modification (IGT125F) to recognise that a previous UNC Modification had not been applied to the IGT UNC as it should have been.

PART CV - NEW SUPPLY METER POINTS AND OTHER SITEWORKS

Major changes have been made to this Part of the IGT UNC following the new introduction of the CSS processes. The existing IGT UNC (CIV 2.5 through 2.9(d)) which has been deleted is now replaced by a UNC point across (G3.4.4 through 3.4.9).

References to UNC text have been checked to ensure that they are pointing across to the correct part of the reordered code (post UNC0708 implementation). We are satisfied that all references in this section are correct following a rigorous review.

PART D – SUPPLY METER INFORMATION

No changes have been made to this section of the IGT UNC.

PART E – METER READING

Changes have been made to this section to align the IGT UNC with changes made to the Metering section of the UNC. These changes to the UNC were extensive and therefore references and additions have been added to the IGT UNC to accommodate this change. The specific areas of change within the IGT UNC are:

- Meter Information;
- Validity of Meter Readings;
- Validation of Meter Readings;
- Cyclic Reading: Class 3 Supply Meters;
- Opening Meter Readings; and
- Other non-cyclic meter reading requirements.

References to UNC text have been checked to ensure that they are pointing across to the correct part of the reordered code (post UNC0708 implementation). We are satisfied that all references in this section are correct following a rigorous review.

PART F – DAILY AND ANNUAL QUANTITIES AND SHRINKAGE

No changes have been made to this section of the IGT UNC.

PART G – PIPELINE TRANSPORTATION CHARGES, INVOICING, PAYMENT AND CODE CREDIT

Minor changes have been made to this section. Specifically, the changes are located within the Late Payment section. These changes have been made to ensure alignment with the UNC and in order to interface with the Retail Energy Code. The reference to ‘Supply Point Confirmation’ was removed as this has now been subsumed into the CSS.

Changes had been made to Appendix G-2 of the Part to remove the references to SPAA MDD following the move of this to the UNC. The Review group queried whether MDD would be the same term now that new terminology has been created in the new joined up approach of dual fuel. Following review, we have removed these changes as references to SPAA will be removed by the Retail Code Consolidation SCR.

PART H - SYSTEM MAINTENANCE AND PLANNING

No changes have been made to this section of the IGT UNC.

PART I - EMERGENCIES

Minimal changes have been made to this section to align new Retail Energy Code defined terms to existing processes. These include 'Referable Registration Nomination' and 'Base Nomination'.

PART J - DELIVERY AND OFFTAKE OF GAS

No changes have been made to this section of the IGT UNC.

PART K - GENERAL

No changes have been made to this section of the IGT UNC.

PART L – MODIFICATION RULES

No changes have been made to this section of the IGT UNC.

PART M – DEFINITIONS

Changes have been made to this section to introduce new Defined terms into the IGT UNC in line with the consequential changes of the CSS, as well as delete those that have been removed from the Code due to CSS. A thorough comparison activity has also taken place to ensure that all definitions that point over to the UNC still exist.

PART N – CDSP AND UK LINK

Minimal changes have been made to this section to ensure alignment with the UNC's latest legal drafting for their consequential change review.

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.

PART G – PIPELINE TRANSPORTATION CHARGES, INVOICING, PAYMENT AND CODE CREDIT

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 REC SPAA MDD . |
| 44. | Meter Manufacturer | Short Code version of meter manufacturer's name for the meter, per as specified in the REC SPAA MDD . |
| 46. | Meter Model Code | The model type of the meter- per as specified in the REC SPAA 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, may be implemented prior to this work being carried out, therefore, we have included this as a catch-all if IGT135 does not get implemented by the IGT UNC Modification Panel.

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 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**.

It has been acknowledged by the RG005 Review group that if IGT135 (which would remove the permissions for Theft Risk Assessment Service (TRAS)) is not implemented then there will still be a need for this permission to stay as the service will still be provided, albeit not under SPAA provisions. We have therefore decided to flag this in the drafting and, if IGT135 is not implemented by Panel to amend the reference to “**Theft Risk Assessment Service**” shall have the meaning ascribed thereto in the ~~SPAADSC~~;

K23.4 (m) ‘To a person appointed pursuant to the ~~SPAADSC~~ to provide Theft Risk Assessment Service whereby such disclosure shall be in accordance with ~~the permissions set out in the Data Permissions Matrix paragraph 5.5.3(f) of Section V of the UNC~~’

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.’

There was discussion at the additional RG005 Review group meeting as to whether Metering should stay in the IGT UNC and there emerged differences of interpretation of the REC schedules. However, the Chair noted that as there had been no direction from Ofgem that they expected to see Metering leave the IGT UNC, this is the way it has been drafted. The Workgroup noted the challenge and were comfortable that under the circumstances and information delivered this was the best approach at this time.

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.

RG005 Review group recommendations

At their meeting on 14th September 2020, the RG005 Review Group was presented with a page turn of the full FS drafting changes and the RCC changes, (including Metering changes which have been drafted with the information known about Metering arrangements at the time).

With the various caveats explained and the limitations on information known re Metering arrangements, the Review group were satisfied with the changes (changes are detailed throughout this document) and recommended to the IGT UNC Modification Panel that these changes be finalised and sent to Ofgem to be included in their consultation.

