



## **IGT UNC Modification Workstream Meeting**

### **Final Minutes**

**13<sup>th</sup> August 2020 via Teleconference**

<b>Attendee</b>	<b>Initial</b>	<b>Organisation</b>	<b>Role</b>
Anne Jackson	AJ	Gemserv	Chair
Cher Harris	CH	Indigo Pipelines	
Chris Barker	CB	BUUK	
Rebecca Cailles	RC	BUUK	
Claire Roberts	CR	Scottish Power	
Ellie Rogers	ER	Xoserve	
Heather Ward	HW	Energy Assets	
Kirsty Dudley	KD	E.ON	
Richard Dakin	RD	E.ON	
Rachel Clarke	RCL	Gemserv	Code Administrator
Kemi Fontaine	KF	Gemserv	Code Administrator

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

The Chair welcomed attendees to the meeting and advised that apologies had been received from Liam King, Ofgem.

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

The Chair confirmed the items for discussion as outlined in the final agenda and asked attendees for 'Any Other Business'(AOB) items. Workgroup members did not submit any AOB items to discuss.

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

The Code Administrator advised that no comments were received on the July Workstream minutes and the Workgroup accepted that these were a true reflection of the discussion.

#### **4. Outstanding Actions**

KF outlined the outstanding actions and updated the Workgroup on the following actions:

**WS 20/07-01-** KF Confirmed that this could remain open as an update had not been received by parties yet.

**WS 20/07-02-** Parties were given the opportunity to review the IGT 'Change of GT Guidance Document' and had no comments on the document and therefore the action could be closed.

## 5. IGT140 – Changes to the IGT Panel Rules

RCL and KD presented the amended Modification and the new guidance Ancillary document. KD highlighted the amendments in the business rules as well as the 'Why Change' section. Furthermore, KD drew attention to the clarity provided within the solution since the last Workstream discussions.

KD highlighted a paragraph which had been a new addition to the 'Why Change' section, that provides clarity concerning the organisation of meetings under the Supply Point Administrator Agreement (SPAA) and the Retail Energy Code (REC). The Modification would align to these principles. KD confirmed that this section was to ensure the outcomes from previous discussions on these principles were recorded in the Modification and to complement the business rules and the solution, thereby ensuring transparency for industry members.

KD summarised the section concerning quoracy and outlined the current practises in the instance that a meeting did not meet quoracy rules. KD noted that the current practice is to not apply quoracy rules to reconvened meetings, therefore a decision could be made regardless of the number of Parties. The intention of the Modification was to amend this to ensure that meetings are fairly represented for all parties. KD referred to the previous discussions regarding the amendment of this practise and noted there were concerns that a decision could be delayed if quoracy were applied to a re-convened meeting.

KD confirmed that although it was a part of the solution to apply quoracy to reconvened meetings, this could be achieved with allowances to enable flexibility with decision making, as long as there was a minimum of two IGT's and one shipper represented. KD stated that this could be achieved via submitting a proxy vote or providing an alternate. KD noted that these methods are similar to those outlined in the drafting of the REC.

KD outlined the amended structure of the solution. The Ancillary Document was presented as an overview document that would be utilised if the Modification was approved and highlights the administrative practices and the proxy voting. Furthermore, KD highlighted its similarity to the UNC and that an annual review of the document would be conducted. KD specified that minor amendments could be made regarding refining the wording of the document by the IGT UNC Panel without the requirement for a Modification. However, a Modification would need to be raised to amend areas of the document which were explicitly and robustly outlined in the main IGT UNC code and where the voting rules are referenced. It is the intention that this document would be continuously be amended to enable the current and new Panel members to be aware of what is required.

KD noted that no amendments had been made to the structure of the Panel and that six voting members would still be required with three votes allocated to Pipeline Users and three to Pipeline Operators. However, the votes would take precedence over attendees, by allowing one Pipeline User, if the only Pipeline User representative in attendance, to have three votes. The Workgroup were presented with an illustration from the Ancillary Document which reflected the suggested panel structures in the following scenarios.

- The first scenario represented a full-strength Panel with all six members from each sector in attendance with an allocation of six votes.
- The second scenario reflected two members from each sector with three votes for each sector allocated to two members, again totalling six votes.
- Lastly the third scenario outlined the instance where there is a fully represented Pipeline Operator sector (or representation of two) (i.e. three votes) and a single Pipeline User (i.e. three votes), again totalling six votes.

CB queried how the allocation of votes was determined. KD explained that this would either be decided by the members themselves and notified to the Chair in advance of the meeting, however in the instance that this could not be decided before the Meeting, the Chair would allocate the votes based on alphabetical order on member names.

KD stated that this process would not be codified initially to allow for the process to be refined and amended if a more efficient process was revealed at a later stage. KD specified that this still encouraged members to attend meetings and this is purely to address the current issue of under representation of Pipeline Users.

The Workgroup were informed that the illustration also highlighted that in the instance that a party was allocated multiple votes, not all votes would need to be cast in the same way reflecting one determination. These votes could be split into different choices as it was to represent all industry Parties. KD highlighted that the determinations would still be established by a Panel Majority decision and if a party does not attend and does not provide an alternate or a proxy vote they would be classed as absent.

KD referred to the outlined approach for quoracy within a meeting and specified that a meeting would be deemed as quorate with a minimum of two pipeline operators and one pipeline user, as this was as low as the outlined voting principles allowed. KD explained that parties would be able to submit a proxy vote and this would be added to the other votes cast.

RD suggested and queried that in the scenario where two parties with the same number of allocated votes disagreed would it not be more useful to have a neutral vote applied instead of assigning the votes via alphabetical order. KD explained that this method was used in the MRA and more applicable to that code as Parties were solely representing their own companies rather than whole sectors such as Pipeline Users or Pipeline Operators. The method had been considered initially, however as it was applied in a very different way it was determined that it would not work with this model.

KD further highlighted the outlined approach for quoracy concerning the responsibility of the Chair to reconvene meetings and notify parties of an agreed date to ensure the Panel is at full strength, rather than the current prescribed mechanism.

The Workstream were presented with the amended template for the Proxy Vote Form which reflected requested adjustments. KD further specified that these safeguards were not to prevent discussion but

to ensure there are no delays to decisions, KD further indicated the following areas outlined within the Proxy Vote Form:

- Abstain
- Reject
- Not applicable
- Comments
- Reasons why
- Other

KD confirmed that the template for the Proxy Vote Form had been modelled on the SPAA, but is not a replica. This would not be codified and could be amended by Panel in the future after review.

The Chair queried how changes to the guidance document and the template could be raised by parties other than the Panel. KD explained that it was envisaged that changes would be made on the scheduled annual review of the document, as the matter would be raised as an agenda item to the Workgroup, before being placed on a Panel agenda. The Chair clarified whether a party could raise a change outside of this review and what the process would be applied. KD noted that the same process would be applied via the Code Administrator and Workgroup, with a five-day window to make the necessary amendments before application.

KD confirmed that the relevant objectives had been reflected to clarify the scope and the full intention of this Modification and this could be reviewed in detail when completing the Workgroup report.

CH confirmed that there were still concerns regarding the different minimum requirements for the two different constituencies and introducing quoracy to re-convened meetings as it could be utilised to purposely stall decisions. However, CH expressed support for the intent Modification so far. RC also agreed with this viewpoint. KD discussed the reasons for the different requirements and highlighted the current issue of Shippers no longer applying for seats on the IGT UNC Panel. This Modification was to ensure that a safeguard was in place.

KD concluded that the next steps would be to review the Legal text and complete the Workgroup report at the next meeting.

## **6. IGT132 – Introduction of IGT Credit Code Rules**

CB reintroduced the Modification to the workstream. CB stated that the Modification was initially to combat the increased number of Supplier of Last Resort (SoLR) events and the increased risk from shippers. CB stated that although there are existing code credit rules that provided protection for these issues within the UNC, there is nothing in place for the IGT UNC. CB noted that there are sections which referred to credit code rules, but these were not robust enough for current scenarios.

CB explained that the Legal Text provided by BUUK for this Modification was based primarily on power's Distribution Connection and Use of System Agreement (DCUSA)'s code credit rules for the following reasons:

- Firstly, CB indicated that a lot of IGTs are also Distribution Network Operators (DNOs) and therefore should be familiar with the code.
- Secondly CB indicated that the DCUSA code rules are simpler to understand and execute.
- Thirdly CB noted that the UNC rules and DCUSA rules originate from the same principles with some minor changes.

CB highlighted that although majority of the rules proposed in the appendix are based on the DCUSA code, there are parts which have been edited to apply more to the UNC and IGT UNC.

KD referred to a concern raised at the last discussion of the Modification. This was that the alignment of the Modification to DCUSA rules could create some complexity for Shippers. KD noted that, although it was understood that there are IGTs who are also DNO's, this would potentially mean that Shippers would have to apply different rules with which they are not familiar. The initial expectation for this Modification was that it would be aligned with the UNC. CB confirmed that this issue had been reviewed and discussed internally and it had been decided that this was the best approach by the Proposer.

Parties also suggested a minimum transitional period of six months after the implementation of IGT132 to allow parties to familiarise and prepare their organisations. CB confirmed this Modification would not mandate the rules for parties but provide an option and the availability for the Pipeline Operators to use these code credit rules. Furthermore, once the rules are applied it would require bilateral conversations between an IGT and a Shipper, so a natural transitional period would be applied. However, CB stated that this could be reviewed if a laid out transitional period was raised in a Modification consultation response.

The Chair confirmed that the next steps would be to review the legal text in the September Workgroup and to complete the Workgroup report in October.

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

The Chair highlighted an issue that could impact Modification IGT135. The Chair informed the Workgroup and the Proposer's representative that at the beginning of the year the Department of Business, Energy and Industrial Strategy (BEIS) carried out a consultation, which was intended for the Smart Energy Code (SEC), Uniform Network Code (UNC) and Master Registration Agreement (MRA) parties concerning some proposed amendments, including the passing of information to facilitate Smart Metering. BEIS plan to use their powers under the Utilities Act to make changes in the MRA and the UNC but omitted to do the same in the IGT UNC. On this basis, the IGT UNC will need to apply the same change, but this will be done through a Modification.

The Chair highlighted that it was clause 5.17 of section V in the UNC that BEIS intends to change, but this clause will be removed by the implementation of the UNC equivalent Modification 'Alignment of the UNC TPD Section V5 and the Data Permissions Matrix' (UNC0697S) . This will be applied similarly in the IGT UNC by this Modification IGT135.

ER confirmed that this had been brought to their attention and discussions had been conducted with Richard Hayes from BEIS when the Consultation was first sent out. The requested data to be sent to the Smart Data Communications Company (DCC) would still need to be via the Contract Management Committee. The Chair noted that as the IGT UNC was not included in the consultation there is no BEIS requirement for the IGT UNC. However, the Chair recognised that within the BEIS change it is the intention to obtain data from UKLINK and the CDSP which will include IGT UNC data, so it will need to be incorporated in Code. The Chair queried how this data would be released for BEIS post the implementation of UNC0697S and IGT135 as their proposed clause for change would not be in either UNC.

ER indicated that release of the information would be via the Contract Management Committee. ER indicated that it was likely there would be no issue as the data required is already sent to the DCC. The Chair queried whether there was any insight to when the data was being forwarded to the DCC as if a decision had not been made in regard to the IGT UNC then any data collected under IGT UNC governance would not be available. ER confirmed that it was being considered by the DSC at present. The Chair noted that the UNC amendment by BEIS was due to be implemented in October. The Chair requested that ER feedback to the Workgroup on how the proposed BIES amendment is being addressed and to report on any progress within the DSC.

ER summarised the following minor amendments which have been made to IGT 135:

- Further clarification has been provided to outline that as the Energy Theft Tip-Off Service (ETTOS) was governed under the SPAA and it was therefore not applicable to the IGT UNC.
- References to the Citizens' Advice Bureau have been changed to the 'The Parties given powers for Consumer Issue Resolution' which would make the definition more generic and future proofed.
- The CDSP were going to publish a report giving a count of those that had received data from via the Data Permissions Matrix (DPM), but this had been amended to list the actual named bodies, following approval from Xoserve's legal team.

The Workgroup reviewed and discussed previous comments on the Modification and formulated a Workgroup Report before concluding it was ready to be presented to Panel. The discussion is summarised in the Workgroup report which can be found [here](#).

**Action: WS 20-08-01**

**Ellie Rogers to feedback to the Workgroup on how the proposed BEIS amendment is being addressed and to report on progress.**

## 8. IGT138 - Performance Assurance Techniques and Controls

CR provided an update on the progression of the equivalent Modification (UNC 0674) and confirmed that an amended version had been submitted to the Joint Office and therefore an amended version of IGT138 would soon to be submitted. The Chair highlighted that the latest version for the Modification had not been formally made available and the latest version available was published in June. CR confirmed that the final version of the Modification would be made available to the IGT UNC.

The legal text was due to be discussed at the next UNC Workgroup meeting scheduled for 24th August 2020. The Workgroup noted the update on the Modification, and it was recommended that parties join the workgroup for the UNC Modification to be involved in its development. The UNC Modification is due to go back to the UNC Panel in September. The Chair noted that the UNC Workgroup report would be finished at that August meeting and it was the intention to complete the IGT UNC Workgroup report at the next IGT Workgroup meeting in September.

## 9. RG005 – IGT UNC Review of Consequential Changes resulting from Faster Switching Programme arrangements

The Workgroup were updated with the current progress concerning the Faster Switching Programme. RCL highlighted the Legal Drafting Progress Report and the Draft Metering Significant Code Review (SCR) text which had been made available to parties prior to the meeting.

RCL explained that the document builds on previous work from this area and outlines the background into what is happening with Retail Code Consolidation (RCC) and the Faster Switching Programme.

RCL noted that the Faster Switching SCR incorporated the Central Switching Service (CSS) which had resulted in a number of changes. RCL outlined the caveats within document, for example the drafting could be subject to change as the Retail Energy Code (REC) schedules are published. RCL also highlighted multiple assumptions that had been made with the Metering Drafting document. RCL indicated it was the intention to review the document and realign where necessary.

RCL confirmed that the latest version of the UNC drafting for the RCC SCR had been reviewed and the current published RCC SCR drafting from Gemserv was based on this text. RCL summarised the following sections of the document:

- In Part H System Maintenance and Planning, RCL highlighted that terms such as Market Domain Data (MDD) and the SPAA had been removed, as they are to be subsumed along with the MRA, and replaced with the REC.
- In Part K the general section of the IGT UNC, RCL noted that the SPAA was only referenced once and had been removed. However, RCL stated that it was anticipated that following the implementation of IGT135 this section would be removed.
- Lastly, in Section M of the defined terms in the IGT UNC, RCL pinpointed references to the SPAA which had been removed.

RCL continued through to the additions made to the RCC drafting and summarised the initial amendments made to Modification rules highlighting the additional causes to Section L 10.1.1 to incorporate the Retail Energy Code Company (RECCo) and the REC Code Manager. RCL explained, this would give those parties permission to raise changes to the IGT UNC along with any Users and Operators, which mirrored the UNC drafting. RCL highlighted that this amendment had also been applied to Section N - UKLink and the CDSP, 1.2.1.

RC queried whether the REC Code Manager and RECCo should make changes to the IGT UNC as they were effectively the same parties. RLC explained that as the REC Manager would be a third-party service provider and the RECCo a separate company, they are not considered to be the same.

It was queried whether Metering was to be included in Ofgem's next Consultation currently planned for October. The Chair confirmed that Ofgem currently plan to publish the required Code drafting, as a result of the two SCR's, for all codes in the October Consultation.

The Chair talked through the proposed amendments to the Metering Section in the IGT UNC. The obligations in terms of RGMA were highlighted, which was a part of the SPAA and will be moving under REC governance and secondly the implications for Meter Equipment Managers (MEMs) (formally referred to as Meter Asset Managers (MAMs)) and Meter Reading Agents (MRAs) that have been signposted as parties that will fall under REC governance in future. The Chair noted that this would be a new concept for Gas Governance as these roles have not been subject to governance so far, unlike electricity governance.

The Chair further explained that Metering within the IGT UNC is slightly different as, unlike the UNC, Metering had not been 'unbundled' from the IGT UNC. Parties are still able to obtain Metering Services under the IGT UNC. The Chair indicated the changes incorporated within the drafting in the form of introducing roles of 'Meter Installer' and 'Metering Equipment Manager'. Where these roles provide services required under the IGT UNC, the services would be subject to requirements under the REC. Beyond this there would be no further obligations in Code.

The Workgroup discussed the possible obligations of parties that perform a metering service under the REC and what this could potentially mean. The Chair highlighted that this could mean additional governance but as the details of the Metering Schedules within the REC are not yet available this could not be confirmed.

The Workgroup noted that this would need to be reviewed with the updated information when it became available. The Chair agreed but confirmed that it was a requirement to submit the drafting as it currently stood to Ofgem for consultation. The Chair agreed that the submissions would be with caveats connected to the publication of additional information and detail.

The Chair outlined a plan to schedule an extra Workgroup meeting in September 2020 to review and agree the IGT UNC drafting for the SCRs before submitting the drafting to the IGT UNC Panel for a final decision. The Workgroup agreed that Monday, 14<sup>th</sup> September looked to be the best date for those present.

## **10. [Cross-Code Modification implications tracker](#)**

The Workgroup were presented with the updated Cross Code tracker and focused discussion around UNC Modifications UNC0710 - CDSP Provision of Class 1 read service and UNC0664V Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4.

In respect of UNC0710, RLC confirmed that there had been some discussions with the Proposer regarding the provisions of the Modification. As the solution would be amending the IGT Arrangements Document (IGTAD) in the UNC, an IGT UNC Modification would need to be raised. RCL confirmed that ESP had offered to sponsor an IGT UNC Modification. The Workgroup acknowledged the impacts on arrangements within the IGTUNC.

ER highlighted that a DSC Change Proposal had been raised for UNC0710 to assess its impacts on the CDSP. ER outlined that once UNC0710 is implemented the CDSP will have responsibility for Class One read provision for Daily Metered sites. ER confirmed it is the intention to create a new service line in the DSC to progress this. The Workgroup discussed how this might be incorporated into the IGT UNC. ER confirmed that the Modification implementation is likely to be June 2021.

RCL provided an update on UNC664V. The modification had been sent out to consultation and following some concerns raised in consultation responses, the UNC Panel had returned the mod to the UNC Workgroup where a Variation to the mod had been identified. On reviewing the legal drafting for the Variation it has become clear that the UNC modification will not be applicable in both the UNC and IGT UNC automatically as first thought.

The Chair confirmed that throughout development of this modification it had always been the intention that this Modification would be applicable to both the IGT UNC and UNC and that had been highlighted in both the UNC and IGT UNC Workgroups. The Chair confirmed that it was the intention of the Proposer of the UNC mod to raise an equivalent legal drafting Modification to ensure that the UNC Modification would be applicable to the IGT UNC and aligned in terms of implementation. The IGT UNC Panel will determine how this Modification will proceed.

## **11. [IGT UNC Known Issues Register](#)**

RCL provided an update concerning Issue Reference 2 - Shipper user verification of supply meters and isolation points. RCL noted this was raised by Brookfields in April 2019. Since then Brookfields has confirmed that this has been reviewed, following internal discussion, and could be removed as it was no longer relevant.

RCL also highlighted the issue of Panel Vacancies. Following Kirsty Dudley's last Panel meeting in August, there could soon be two empty Panel positions for Pipeline User representatives which would affect quoracy of Panel meetings going forwards. RCL confirmed the Chair had written to parties via the usual circulation lists and those of the Joint Office to encourage participants to put their names forward and a further reminder had also been sent.

**12. AOB**

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 Thursday, 10th September 2020**

**Appendix A – Action Log**

Action reference	Action Description	Owner	Status
WS 20/08-01	Ellie Rogers to feedback to the Workgroup on how the proposed BEIS amendment is being addressed and to report on progress.	ER	New
WS 20/07-01	CG to confirm that an Xoserve Change request re IGT Asset Transfers has been raised.	CG	Open
WS 20/07-02	Shippers to review the IGT Change of GT guidance document considering the recent experience and to ensure it is up to date with current practises.	All	Closed