

IGT UNC Modification Panel Meeting

Final Minutes

Friday 23rd October 2020

Via teleconference

Attendee	Initials	Organisation	Representing	As
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Liam King	LK	Ofgem	Authority	
Kirsty Dudley	KD	E.ON	E.ON	Observer – Proposer of IGT147
Claire Roberts	CR	Scottish Power	Pipeline Users	
Brandon Rodriguez	BR	ESPUG	ESPUG	Observer – Proposer of IGT148
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Jennifer Rawlinson	JR	BUUK	Pipeline Operators	
Carine Russell	CRu	Last Mile	Pipeline Operators	
Rachel Clarke	RC	Gemserv	Code Administrator	Code Administrator
Kemi Fontaine	KF	Gemserv	Code Administrator	Secretariat

1. Welcomes and Apologies

The Chair welcomed the Panel to the reconvened meeting. The Chair noted that following the ongoing quoracy issues the Panel faces, the Code Administrator had opened a meeting prior to this and held that open for one hour as per Code rules (Part L6.10). The Chair had not received any apologies prior to the meeting. The Chair welcomed Kirsty Dudley (E.ON) and Brandon Rodriguez (ESPUG) to the meeting who would be presenting their respective Modification Proposals to the Panel.

2. Confirmation of Agenda

The Chair confirmed the items for discussion as outlined in the final Agenda. The Panel were invited to add any items for AOB. The Chair confirmed there would be a discussion on the digitisation of the IGT UNC.

3. Approval of the previous minutes (20-09 and 20-09 Reconvened)

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

4. Outstanding Actions

Outstanding actions were reviewed by the Panel and determined;

20/07- 03 – KF confirmed that this action could now be closed as the non-implementation notices for IGT141U and IGT144U have now been published on the IGT UNC website following official confirmation from Ofgem.

20-06-02 – KF confirmed that this action should remain open as it was the intention to add this to the November 2020 Workstream Agenda. The Chair noted that it was now known that the review group had been postponed

until 2021 and the scheduling had yet to be confirmed, however, the Chair noted it would be beneficial to complete the output page before the end of the year.

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

Workgroup Reports

5. [IGT145 - Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4](#)

The Panel were presented with the completed Workgroup report and noted the equivalent UNC Modification 664V has been returned to workgroup for further amendments, therefore, this Modification was now ahead of the UNC equivalent. The Chair highlighted that this would need to be taken into consideration when determining the Modifications next steps and whether the Panel felt that this had impacted their decision to send this Modification out to Consultation. CR queried whether it would be worth returning IGT145 to workgroup until the equivalent Modification had been submitted.

The Chair explained that the Modification solution in IGT145 was not the same as the UNC equivalent Modification (as IGT145 only includes the point across to the UNC to enable the changes), therefore, parties may be unsure what to discuss further on the Modification as the additional variant on UNC664V was specific to that Modification only. The Chair outlined the issues highlighted by the UNC Panel concerning the element of the Modification which stated that should a Shipper not meet the standard Meter Reading, the Central Data Service Provider (CDSP) would automatically change certain Meter Readings and move them into other classes. It was indicated that in the instance that a Shipper is operating with multiple Suppliers that this could have negative impacts on the Suppliers who are performing appropriately due to another Supplier's poor performance.

RC noted that at the last UNC Panel meeting it was indicated that the Modification would go back to workgroup for two to three months. JR suggested that the Panel could suspend a decision pending more information being made available with the realisation that IGT145 may need to be returned to a Workgroup. This was supported by Panel which unanimously determined that a decision could be postponed, and the Modification was to be returned to Workgroup when further information was provided.

Final Modification Reports

6. [IGT135 - Alignment of the IGT UNC Part K and the Data Permissions Matrix](#)

The Chair opened the discussion the on the Final Modification report for IGT135 and noted the UNC equivalent 697VS had been varied and implemented in the UNC September Panel meeting. The Chair confirmed what the variation concerned the Business, Energy and Industrial Strategy (BEIS) Consultation which was implemented in code in August 2020 and highlighted that the legal drafting of 697VS had been amended to not remove the clause incorporating the BEIS change which was the original intention. RC led the discussion on the Consultation responses for IGT135 and highlighted that the Modification received three responses which were all in support of implementation. Furthermore, RC confirmed that all parties were in support of the Modification and fulfilled the following elements proposed:

- Legal text

- Self-governance status
- The implementation to be aligned with the UNC

The Panel had no further questions or comments and determined that if the Modification was still to follow the Self Governance route and that the Modification did not impact a Significant Code Review (SCR), furthermore the Panel agreed that the Modification positively impacted the proposed Relevant Objectives. The Panel discussed the implementation of IGT135, RC noted that the UNC had been contacted in regards to the equivalent Modification and it had been agreed that the implementation dates of the two Modifications would align subject to determinations made on the IGT UNC Panel. The Chair confirmed that this would mean an extraordinary release. The Panel discussed plausible implementation dates and how this would impact operation. RC confirmed that the earliest release for the Modification would be the 18th to 20th November 2020. The Panel queried if there were any other Modifications that would require an adhoc release and suggested that this could be grouped together. The Panel unanimously determined that the Modification could be implemented on the date recommended by the Code Administrator and had no further comments.

Further details regarding the consultation results and determinations can be found in the post Panel Final Modification Report linked above.

7. [IGT140 - Changes to the IGT Panel Rules](#)

RC presented the Panel with the Consultation responses and noted that there were six respondents and confirmed that three responses from Pipeline Operators and three from Pipeline Users. RC confirmed that four of the respondents supported the Modification and two did not. Furthermore, RC confirmed that parties in support agreed that the Modification met Relevant Objective F (*Promotion of efficiency in the implementation and administration of the Code*) and one Party indicated that the Modification negatively impacted Relevant Objective D (*Securing of effective competition*). RC confirmed all respondents agreed that the Modification should be subjected to an Authority decision. RC confirmed that those in support agreed that the legal text facilitated the Solution. RC highlighted the comments made from parties who opposed the Modification, with regards to the possible impacts of the proposed changes on Panel minimums, reconvened meeting and costs.

The Panel acknowledged the responses and determined unanimously that the Modification should be subject to an Authority decision. and the Panel discussed the proposed positive impact on the Relevant Objectives, a Panel member indicated that the Modification negatively impacted Relevant Objective F, noting that it is their opinion that the proposal is substandard in comparison to the current provisions.

The Panel discussed the reasoning for why the Modification negatively affected Relevant Objective F, highlighting the elements concerning the allocation of multiple votes by the Chair to One Shipper and applying quoracy to reconvened meetings which could have a detrimental effect on the efficiency of Panel Business. The Proposer acknowledged the challenges and highlighted that current process only provided the option of appointing an alternative, where the proposed Modification provided further options and had yet to be put into practise in the IGT UNC, therefore, parties could not be sure that it wouldn't work well. Furthermore, KD highlighted that the SPAA code currently did not make non quorate decisions and indicated this was an incentive for parties to be available or submit a proxy vote. The Panel further discussed the challenges raised against the Modifications, with the Proposer noting that the proposed changes were not unique and that a precedent had already been set in the industry.

The Chair noted that the Modification had been raised out of concern of a lack of engagement from Shippers. The Chair queried whether the proposed changes would improve this. The Panel discussed how the Modification may encourage Shipper engagement and whether the proposed methods were sufficient. JR concluded that it would be hard to quantify that, however, felt that the provisions being introduced may in fact create an obstacle for the continuity of Panel business rather than a solution to it. The Chair noted that the proposed implementation was five days after the Authority decision, the Panel agreed that if this was to be implemented that that would be a sensible approach. CH suggested that this may be considered for inclusion in the next scheduled release following an Authority decision. The Proposer also reiterated that there was an IGT party that had indicated that it was in full support of the Modification and its intentions within its consultation response.

The Panel voted on recommending implementation to the Authority. Three Panel members recommended that this Modification should not be implement and one Panel member voted to recommended to implement. The decision via a Panel Majority is therefore not to recommend that this Modification is implemented.

The Code Administrator will send the finalised Final Modification Report to Ofgem and ask the Authority to decide on its implementation.

Further details regarding the consultation results and determinations can be found in the post Panel Final Modification Report linked above.

8. [IGT146F - Introduction of references to incorporate the BEIS legislative changes made in the UNC](#)

The Chair opened the discussion on the Final Modification Report for IGT146F and noted that the Modification had been put forward through Fast track procedures due to addressing the error made by BEIS in omitting the IGT UNC from its consultation. In light of the implementation of the text in the UNC (August 2020) and the go live date of October (as dictated by BEIS) this was seen as the most pragmatic route to ensuring parity and compliance with the new legislation. RC presented the Panel with the Consultation responses received on the Modification and confirmed that there had been two responses. RC further confirmed that both respondents were in support of the Modification and were comfortable that it met the positive Relevant Objectives C (Efficient discharge of the licensee's obligations) and F (Promotion of efficiency in the implementation and administration of the Code) proposed. RC lastly confirmed that parties were comfortable that the legal text facilitated the solution and that the Modification should be included in an ad hoc release. The Panel had no further comments or queries and determined that the Modification appropriately followed the self- governance route and agreed with the proposed Relevant Objectives.. Lastly, the Panel unanimously agreed the Modification should be implemented and determined that this should be within an extraordinary released arranged for IGT135 in November 2020..

Further details regarding the consultation results and determinations can be found in the post Panel Final Modification Report linked above.

New Modifications

9. IGT147 - Updating Specific Gender References to Neutral terms

KD led the discussion on the new Modification and highlighted that this was initially introduced as an AOB item as E.ON discovered through reviewing the code that it still incorporated gender specific terms and the Panel suggested that a Modification was needed to ensure these were up to date and gender neutral. KD confirmed that the Modification would remove terms such as 'Him', 'His' and 'He' and change them to the appropriate neutral equivalent. Also subject to the implementation of IGT140 (Changes to the IGT Panel Rules), would also include 'Chairman' to 'Chairperson'. This would mean that some legal text would need to be redrafted to ensure the text still makes sense in the context it was intended. KD confirmed that in the pre-modification discussion in the October 2020 Workgroup, it advised that due to there being 60 references with in the IGT UNC that the fast-track process was not applicable, however, the Workgroup confirmed that this would not need to be reviewed by them again and that there was faith in the legal text provider that the legal text would be done correctly. The Workgroup noted that any issues or challenges should be raised during the consultation period. KD confirmed that this would also be applied in the UNC, however, there were no cross-code obligation, and this could be conducted independently.

The Panel had no further comments in regard to the presentation of the new Modification and discussed the timetable, Relevant Objectives and highlighted the possible impact on the drafted Faster Switching and Retail Code Consolidation SCR legal text. KD noted that E.ON had done a light touch analysis on the SCR drafting and that there were no immediate causes for concern, however, urged the Code Administrator to review this independently for completeness. The Panel confirmed that that any conflicts found could be reported back to the Code Administrator. The Panel unanimously Requested for the legal text to be provided for this Modification and presented at the November Panel meeting.

10. IGT148 - IGT UNC Modification Proposal-Class 1 Meter Reads

The Panel were presented with the new equivalent modification to UNC710 (CDSP provision of Class 1 read service). BR explained that the Modification was proposes that the Central Data Service Provider (CDSP) provides the Class 1 Supply Meter Point (SMP) read service. It will remove the Large Transporter's obligation to provide the Daily Read service to Shippers for non-telemetered Class 1 SMPs as Xoserve, the CDSP, will assume responsibility for these.

BR noted that the Large Transporter advised that it has become an increasingly uneconomical service. BR confirmed that this Modification was to remove this obligation from the IGT UNC and transfer it to the CDSP. JR queried whether it would also transfer the activity as well the obligation and BR confirmed that it would be both.

BR led the discussion on the governance and Relevant Objectives and highlighted that competition was not likely to be impacted although acknowledged the challenge that this is effectively mandating one party to provide the service. BR noted that this had been extensively discussed in the UNC through UNC710 and that parties were comfortable with the approach being taken. BR advised that this Modification would be subject to self-governance. However, as the Modification heavily crossed over between the IGT UNC and the UNC the implementation would need to align with the UNC 710 Modification and corresponding DSC XRN change to maintain integrity between the two Codes. The Panel discussed the necessity for the Modification within the IGT

UNC as the read was not needed by the IGTs for settlement purposes and determined that this could be referred to workgroup for review.

The Panel unanimously agreed to send this to Workgroup for development.

11. IGT UNC Code Realignment review (IGT137)

The Chair noted that during the implementation discussions of IGT137, the Panel expressed a wish to review the new implemented text in three months' time to mitigate the short amount of time parties had to review the text during consultation. The Chair confirmed that the Code Administrator had not had any issues reported to them on the test and that there was no unforeseen impacts of re-ordering of the Code and, therefore, there was nothing to report.

The Chair advised that this should be re-visited annually on the anniversary of the implementation of IGT137, in order to give adequate time for any cross-over issues to arise if there are any. The Panel agreed this approach.

12. UNC Panel update

RC updated the Panel on the October UNC Panel discussions with regards to the review of their guidance document on Legal text drafting. RC noted that this is an annual review and that UNC Panel members were invited to submit amendments to the document at the September UNC Panel meeting. RC noted that the Code Administrator reviewed the document and had submitted amendments to the document which would improve the cross-code arrangements on legal text. RC noted that this was to avoid another situation as that experienced throughout the development of UNC691S. RC confirmed that this discussion had been deferred until the November UNC Panel meeting and that the Code Administrator would be in attendance to answer questions on this and will report back to the IGT UNC Panel at its next meeting.

13. Panel Member Vacancy

The Chair confirmed that the two positions had still not been filled, however, it was the intention to raise the issue at the next CACoP (Code Administrators Code of Practice) meeting and that it was to be included with in the monthly CACoP newsletter which is due to be published later this month. The Panel had no further queries with regard to the advised next steps and thanked the Code Administrator for their efforts.

14. Workgroup Summary

RC presented the Workgroup Summary to the Panel. The Panel had no further queries about the presented Workgroup Summary.

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

15. Authority updates

The Chair thanked the Authority for publishing the official decision for IGT141U and IGT144U and noted that the non-implementation notices had been published by the Code Administrator. The Authority had no further updates.

16. AOB

Digitisation the IGT UNC

The Chair invited KD to lead the discussion of the digitisation of the IGT UNC. KD noted that this had been born out of discussions at the IGT UNC Workstream meeting through the Party engagement work that had been carried out by the Code Administrator. KD noted that it would be beneficial to know if digitisation of the IGT UNC was on the Panels agenda as it was seen as being a way of easing blockers for Shippers and is the way Code governance is heading. JR supported this discussion, however, noted that this would need to be approached in a holistic manner. JR indicated that the digitising of the IGT UNC may assist in a code consolidation work and there needed to be a collaborative effort from both the IGT UNC and the UNC. The Panel discussed the possible next steps and what methods could be taken to move forward on the topic. The Authority suggested that it may be beneficial to organise a Joint workgroup with the UNC to maximise the different viewpoints. The Panel unanimously concluded that it should be sent to Workgroup to discuss with them the intention to approach the Joint Office to propose a combined workgroup, however, subject to the UNC not agreeing to a joint discussion, that the IGT UNC workgroup will explore and develop the item and return this back to Panel for review.

The Code Administrator resolved to include this in the Party engagement discussions at the next Workstream meeting.

No further items of business.

The next IGT UNC Panel is scheduled for 27th November 2020.

Appendix 1 – Actions Table

Reference	Date	Action	Owner	Status
20/07- 03	24 th July 2020	Authority to send the official non-implementation notices for the rejected Urgent Modifications IGT141 an IGT144 to the Code Administrator before the August Panel meeting.	LK	Closed
20/06-02	26 th June 2020	Code Administrator to draft a one-page document from output developed at the November 2020 Workgroup meeting and to send to the Proposer of UNC676R governance workgroup to improve cross-code working.	CA	Open