



IGT UNC Modification Workstream Meeting

Draft Minutes

12th November 2020 via Teleconference

Attendee	Initial	Organisation	Role
Anne Jackson	AJ	Gemserv	Chair
Cher Harris	CH	Indigo Pipelines	Items 1-8 only
Chris Barker	CB	BUUK	Items 1-6 only
Rebecca Cailes	RC	BUUK	
Brandon Rodriguez	BR	ESPUG	Items 1-5 only
Heather Ward	HW	Energy Assets	
Kev Duddy	KDu	ESPUG	Item 12 only
Matt Thomas	MT	Fulcrum Pipelines	Item 12 only
Claire Roberts	CR	Scottish Power	
Kirsty Dudley	KD	E. ON	
Ellie Rogers	ER	Xoserve	
Liam King	LK	Ofgem	Items 1-6 only
Rachel Clarke	RCI	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 no apologies had been received prior to the meeting. The Chair noted that Kevin Duddy (ESPUG) and Matt Thomas (Fulcrum Pipelines) would join the meeting to present an AOB item on Asset Transfers. The Chair reminded Workgroup members that it was important for parties to notify their attendance with the Code Administrator in advance of the meeting to ensure that meetings go ahead with a balanced discussion. The Chair noted that there is a possibility of meetings being cancelled if there is not adequate representation from both sides.

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. The Chair confirmed the following items for AOB that had been declared.

- Extraordinary Release – 18th November 2020
- Password Renewal Reminder
- Upcoming Asset transfer between Fulcrum Pipelines and ESPUG

The Workgroup had no further items of AOB to be declared

3. Approval of the Previous Minutes

KF informed the meeting that no comments had been received on the minutes of the previous meeting. No comments were received in the meeting and the minutes were approved as an accurate reflection of the meeting.

4. Outstanding Actions

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

WS 20-10-01: KF noted that a placeholder meeting had been arranged, however, this had later been cancelled as an expected further update to UNC674 had not been received. KF noted that it is still the intention of the Code Administrator to arrange a further additional meeting for IGT138 development as this Modification continues. KF noted that this action can now be closed.

WS 20-17-01: KF noted that an update had not been received by Carly Gilchrist (Fulcrum Pipelines) before her Maternity leave, however noted that this would be raised with Matt Thomas (Fulcrum Pipelines) in AOB.

Following a discussion during AOB it was confirmed by MT and ER that an Xoserve XRN change had not been raised by ESPUG or Fulcrum Pipelines, however, Xoserve were looking to raise an internal change to address the current data limitation on STN data flows. The Workgroup determined that this action could now be closed.

Introduction of new Modification

5. [IGT148 - IGT UNC Modification Proposal-Class 1 Meter Reads](#)

BR introduced the Modification to Workgroup, noting that this 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. This modification incorporates developments of UNC 710S (Provision of Class 1 meter read service by the CDSP) which has been raised for the UNC. BR noted that this Modification seeks to utilise the Self-governance process and noted that this was due to a number of reasons, listed in the Modification. However more importantly, UNC710S started off as an Authority decision and following guidance from Ofgem, the UNC Panel change the governance route to Self-Governance. BR noted that the UNC Panel have already determined that UNC710S should be implemented.

BR noted that the driver of change was that this service had become uneconomical and inefficient for DNs and the removal of the obligation within the IGTAD (IGT Arrangements Document) by UNC710S had left a gap with regards to IGT Supply Points. BR noted that the number of Class 1 meters which fall under this obligation is relatively low, however, the gap in obligations had to be addressed.

BR presented the proposed solution to the Workgroup, noting that this proposed two areas of change, both in the IGT UNC Part E and the Data Services Contract (DSC). BR acknowledged that changes to the DSC changes would not be included in the legal text of this Modification as this sits outside of the Code governance. BR continued that the changes that are to be made to Part E of the code are to remove references to the Class 1 meter read obligations and references to Daily Read Equipment.

BR highlighted that with regards to consumer impacts, this modification may result in positive consumer impacts due to Shippers having more control of the service and being able to obtain and internalise the benefits and costs of achieving a given standard. KD noted that although there is the possibility of this, it is important to highlight that these may not be seen straight away.

BR noted that the proposed implementation date was 1st June 2021 for both IGT UNC and UNC changes and that this had been driven by discussions in the UNC Distribution workgroup, who indicated that they wished to avoid implementation in winter months. Parties noted that starting this at the beginning of the month would be cleaner and that June 2021 gave enough time to develop the related XRN change (XRN5218) in the DSC Change Management meeting.

KD queried what would happen if UNC710S was implemented before the IGT UNC Modification had been implemented and where that would leave the Class 1 IGT Supply points with regards to obtaining meter readings. ER noted that the obligation to obtain meter readings had now been placed on the CDSP (Central Data Services Provider). RCI questioned whether the XRN change, which was the driver for implementation of these two Modifications, would be completed without an IGT UNC Modification going through the change process. ER noted that there was a desire from DNs that UNC710S was not held up by UNC148, however, noted that it would be very unlikely to complete without IGT148 being implemented by the Panel. KD added that the scope of XRN5218 had not been widened to include IGT Supply Points and that amending this to include these would give sufficient comfort to parties that there would be no gaps left. BR noted this and resolved to speak with Richard Pomroy (Wales and West Utilities) who is the proposer of the XRN to widen the scope.

20-11-01- BR to speak to Richard Pomroy (WWU) on extending the scope of XRN5218 (CDSP provision of Class 1 read service) to include IGT UNC Supply points in the change to ensure that no supply points are left out of the solution.

Modification Workgroups

6. [IGT132 - Introduction of IGT Credit Code Rules](#)

RCI presented the Workgroup Report to the meeting, noting that as there had been limited discussion of this Modification over the past few months that the report had questions throughout to prompt discussion. The Workgroup were happy to proceed on this basis and RCI led them through the document.

The Workgroup discussed why this Modification should be subject to an Authority decision. CB noted that this was decided following guidance from Ofgem. LK confirmed that it was the Authority's assumption that this Modification would come to them for a final decision on implementation. The Workgroup discussed how the Modification meets the threshold for the Authority decision process. The Chair and Ofgem representative noted that these were set out in the Gas Transportation Licence. The Workgroup discussed whether this would be suitable for Self-Governance procedures, however, parties determined that there would be a material impact on competition due to this Modification and, therefore, this was the correct approach.

The Workgroup discussed the Solution. CB noted that the Gas Transportation Licence conditions sit alongside legislation which looks to have a layered protection for the market. Code credit rules add additional safety measures alongside this. CB noted that even though code credit rules as rigorous as these proposed have not been in code prior to this Modification, that obligation has been in Licences for some time. The Workgroup noted these comments and had nothing to add.

The Workgroup also discussed how the solution has been drafted. KD noted that there were concerns raised throughout the development of IGT132 around not having a consistent approach with either gas or electricity (having used both existing DCUSA and UNC obligations) however, noted that the aim of this Modification was to create the best approach for IGTs. CB noted the challenge, however, added that Shippers had been taken into consideration when developing this Modification. CR noted that concerns had not been raised internally and that the code landscape is heading towards a dual-fuel approach with the creation of the Retail Energy Code, therefore, this may not be a negative point.

The Workgroup discussed the potential impacts of this Modification and CB gave some context with regards to new entrants in the IGT market. CB noted that as the solution did not mandate the use of the rules for all IGTs, there is time for new entrants to review these rules and have sufficient protection that there will be no requirement to use these immediately, if at all. KD queried whether the optionality of the solution could dilute the intention of the Modification. CB noted the challenge but added that it would give flexibility to those who would use the rules. CB also noted with regards to Shippers/Suppliers, there is a built-in allowance within the Ofgem pricing model which covers code credit and, therefore, should only have minimal consumer impacts if another allowance is required for the addition of another party. CB acknowledged that as a transporter they cannot accurately confirm this, however, this has been explained to him as the process. KD queried this assumption, noting that no one in the group are close to Supplier pricing models and that this should be reflected in the Workgroup report.

The Workgroup discussed the suggested implementation dates for this Modification, with KD noting that the timeline for this change could come close to the next scheduled release (February 2021) and would therefore not afford parties sufficient notice of the changes. KD suggested that three to six months post an Ofgem decision would be an appropriate timescale. CB acknowledged the challenge, however, added that because the rules are not mandatory, even if this was implemented next week, there would be a period of readying.

The Workgroup discussed the legal text and noted that shippers indicated that further analysis would happen during the consultation period. No Workgroup member raised any concerns over the legal text as it was presented.

The Workgroup agreed that this Modification had been sufficiently discussed and should proceed to Consultation. This recommendation will be put to IGT UNC Modification Panel at their November 2020 meeting for their consideration.

IPL042 - Removal of Code Credit Rules from IPL Network Code

RCI presented the Workgroup report to the group. RCI noted that this change and the change for QPL042 (Removal of Code Credit Rules from QPL Network Code¹) were identical, therefore, it was proposed that both changes were considered under this discussion and replicated in both reports. The Workgroup agreed to proceed on this basis. The Chair noted that these documents would be presented to the proposer (BUUK) prior to their publication as they were not in the meeting.

The Workgroup discussed the Governance, Solution, Impacts, Relevant Objects, Implementation and suggested legal text for these Modifications. Implementation is conditional on the implementation of IGT132. The Workgroup supported the Proposers suggestions for all sections and noted that the suggested legal text facilitate the intention of the solutions.

The Workgroup agreed that this Modification and that of QPL042 have been sufficiently discussed and should proceed to Consultation. This recommendation will be put to IGT UNC Modification Panel at their November 2020 meeting for their consideration.

7. IGT138 - Performance Assurance Techniques and Controls

CR updated the group on the status of the UNC equivalent Modification UNC674 (Performance Assurance Techniques and Controls). CR noted that the Proposer of this Modification will be submitting the latest version (V15) to the Joint Office on Monday 16th November 2020 and had requested an additional meeting to discuss this Modification in early December.

The Chair explained that it was intended that all the changes up to the final version of UNC0674 would be incorporated into a new version of IGT138, and that this new version would be discussed at the next meeting and the workgroup report would also be completed. The Chair explained that as UNC0674 and IGT138 would both be going to the Authority for a decision, that the intention was to keep the two modifications running in parallel and that the intention, therefore, was to present the Workgroup report at the December Panel.

KD expressed concerns about the timetable of the Modification and felt that its complexity warranted more consideration by the workgroup and that matters should not be rushed.

The Chair explained that the major element of complexity was in UNC0674 (and not IGT138) and that this could not be challenged through the IGT UNC Workgroup. Parties were encouraged to engage in

¹ <https://www.igt-unc.co.uk/gpl042-removal-of-code-credit-rules-from-gpl-network-code/>

the UNC0674 discussions and consultation if they had any concerns about the Performance Assurance Regime being advocated through the UNC modification.

The Chair explained that IGT138 is simply adding a Performance Assurance Regime, targeting settlement accuracy into the IGT UNC and that the regime will be that advocated by UNC0674.

The Chair acknowledged that if something unforeseen did occur this may impact the Modification timetable and that a meeting focussed on this Modification alone before the December Workstream would mitigate against this risk.

POST MEETING NOTE: The date for the additional workgroup meeting for IGT138 is Monday, 30th November at 1pm. Details can be obtained from the Code Administrator.

8. Party Engagement Discussion – Digitisation of the IGT UNC

RCI introduced a presentation to the Workgroup, noting that these discussions were born out of an IGT UNC Modification Panel discussion at the October meeting. RCI noted that the Workgroup were tasked to discuss the appropriateness of digitisation of the IGT UNC and suggest the next steps as presented in the presentation (linked above).

RCI explored how a digitised world could look, noting various areas of improvement such as recorded meetings, compatibility across devices, digital voting, a hook into licences or processes as well as a digital code. RCI noted that Ofgem have promoted a digitisation of Code Governance through their consultations. RCI noted that Code bodies such as the Smart Energy Code (SEC), Retail Energy Code (REC) and Smart Meter Installers Code of Practice (SMICoP) have already taken steps to digitise their codes. KD noted that digitisation of the IGT UNC and the UNC could solve the issue of amalgamating the codes for parties. KD noted that linking the codes would resolve a lot of issues experienced for parties and there would be a much more efficient process for change. KD welcomed the discussion and noted that this would be a way of bringing the codes into the present day, noting that once the REC portal has been delivered, traditional codes with static PDFs would look out of date. HW noted that it would be important for any system to be interoperable with existing systems, especially as the IGT UNC and UNC will feed into the REC following the implementation of the Significant Code Review (SCR) work.

The Workgroup acknowledged that to achieve the most efficiencies, both the IGT UNC and UNC would have to be on the same system, however, KD noted that if the UNC do not feel like this is viable at the moment, it should not put off this Workgroup on bettering the IGT UNC. CH noted that there would be a business case for digitising the code, however, did not see a need for other initiatives such as recording meetings. RCI noted that the listed items were not exhaustive and that these inputs were valuable in scoping what is important.

The Workgroup indicated that simple things such as hyperlinks in documents that took you to a document location but that also returned you to the original document or greater and better use of the website would be helpful.

The Workgroup discussed possible next steps and determined that the first thing to do would be to approach the Joint Office to engage in discussions on this. RCI resolved to speak with the Joint Office and report back to the next Workgroup meeting.

20-11-02- CA to speak with the Joint Office on Digitisation and report back to the Workgroup on the discussions and next steps in December 2020.

9. [Cross-Code working between the IGT UNC and the UNC](#)

RCI noted that this agenda item was an action taken at a Panel meeting following the IGT UNC's experience with the legal text drafting of UNC691S and historic interactions between the codes. RCI noted that the Workgroup were asked to review the suggested positives and areas of improvement listed in the presentation (linked above), and are asked to form a position to be incorporated into a report which will be sent to the Proposer of UNC676R (Review of Gas Transporter Joint Office Arrangements).

RCI presented some of the positive areas of the relationships between the codes, including the fact that legal text suggestions are taken into account in UNC Modifications. The IGT UNC Chair is invited to attend the UNC Panel meeting, and that the workgroup actively considers if there are IGT UNC implications (although it was acknowledged that this was largely driven by attendees to workgroups).

Some of the areas of improvement discussed were that there is no current GT representation on IGT UNC Panel, aligned implementation dates are usually outside of a scheduled release. HW queried why this is the practice. The Chair noted that where the IGT UNC Panel decide on implementation dates, the UNC Panel do not set the implementation dates and that these are set by the DNs. Therefore, these are usually set as 16 business days following a decision (for Self-Governance Modifications).

KD noted that a lot of issues may be solved by addressing the cross-code impacts section of the Modification proposal forms. KD noted that another Code Body uses a tick list which actively asks the proposer to consider the impacts on other codes. The Chair noted that over a year ago the Code Administrator approached the Joint Office to suggest adding a similar suggestion to the forms and it was met with resistance. KD noted that changing the report would give early indications as to whether a change implicates another code and would ensure that discussions are actively included at an early stage about cross-code impacts.

RCI noted that it was possible for Code Administrators to amend their forms, noting that the forms have diverged since they were introduced by Ofgem some years ago. KD noted that the IGT UNC should not wait for the Joint Office to change their forms as it would be a helpful exercise to get a quick win. RCI noted that this suggestion would be incorporated into the final report.

RCI asked the Workgroup to add any other areas of positive work or areas of improvement and they confirmed they had nothing further to add. RCI noted that a report would be created and brought back

to a future Workgroup with the aim to send an agreed report to the Panel and then onto the proposer of 676R for discussion in their meetings.

20-11-03- CA to include the workgroups suggestions of the positive aspects and areas for improvement between the IGT UNC and UNC Code Administrators in a report to send to the proposer of UNC676R.

10. [Cross-Code Modification Implications Tracker](#)

RCI noted that due to time constraints, parties were invited to review the document and contact the Code Administrator if they had any specific questions.

RCI updated the Workgroup on UNC736/A (Clarificatory change to the AQ amendment process within TPD G2.3). RCI noted that the Code Administrator had been in touch with the Joint Office following a review of the current legal text drafting for UNC736/A (v1.0 14th October 2020). RCI noted that as it stands, and subject to no changes being made to the legal text, there would be no need for an IGT UNC Modification as the changes would be captured under the current code text. RCI stressed that this position was dependant on the legal text remaining the same on implementation and that this has been communicated to the Joint Office. RCI noted that as the changes will effect IGT Supply Points, communications will be sent out if UNC736/A is implemented to ensure parties are aware that although there have been no code changes in the IGT UNC that the obligations will have changed as a result of this Modification.

The Workgroup acknowledged the update and have no further comments.

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

RCI noted that due to time constraints, there were no significant updates to give on the Known Issues register and invited the Workgroup to highlight any Issues they believe should be added to the register. The Workgroup had no issues to add.

12.AOB

Asset Transfer between Fulcrum Pipelines and ESPUG

The Chair welcomed Kev Duddy (ESPUG) and Matt Thomas (Fulcrum Pipelines) to the meeting to speak to the Workgroup regarding the upcoming asset transfer between the two companies.

KDu explained that the first tranche of asset transfers had happened in May this year and that this was the first of a series. The asset transfer that will be happening on December 1st will be the second and would involve approximately 7500 MPRNs and meter assets.

KDu explained that the asset transfers would be standardised from here onwards, with two events happening per year on the 1st June and the 1st December and that this would continue for between three and five years depending on building progress.

KDu indicated that the shippers that would be impacted would be contacted in the following week.

KD indicated that shippers were again on the 'back foot' in respect of the asset transfer as had been the case on the previous occasion, although she understood the reasons for this. She explained that IT teams cannot respond in time for the event.

A suggestion was made that something to support the process might be added to the IGT UNC website. KDu admitted that he had not thought of this and would consider the idea.

The MPRN range table updates were still not available and KDu said the impacted MPRNs would be sent to the Code Administrator in the following week. The Code Administrator would then update the range tables and load these to the IGT UNC website.

KD asked if the MPRN range tables could be available for at least a month before the event. The Code Administrator indicated that this would mean that the impacted MPRNs list would need to be available 5-6 weeks before the event so that the range tables could be updated.

ER explained that the GT updates would be sent to shippers on an STN file, but that the meter details, such as the Meter Asset Provider (MAP) would not be updated through this file. It was indicated that the meter details would be revised through an ONUPD file which would be provided by ESP and that this would correct, amongst other things, the MAP id.

ER confirmed that no XRN (a system change) had been raised in respect of this process, specifically in connection with the volume constraints that meant that UKLink updates for the event were phased.

Extraordinary Release – 18th November 2020

RCI noted that an extraordinary release had been scheduled alongside the UNC for the implementation of IGT135 (Alignment of the IGT UNC Part K and the Data Permissions Matrix) and IGT146F (Introduction of references to incorporate the BEIS legislative changes made in the UNC). RCI confirmed that no changes were incorporated into the scheduled November release on 5th November 2020 and that the current version of the code is V13.3 (soon to be v13.4 on 18th November 2020).

ER noted that at the next DSC Change Management Committee meeting, members would be presented with changes to remove parties from the Data Permissions Matrix (DPM) and moved into the DPM Conditionality Document following the implementation of UNC697V (Alignment of the UNC TPD Section V5 and the Data Permissions Matrix) and IGT135.

Password Renewal Reminder

RCI reminded Workgroup members that passwords for the provision of information sharing between Shippers and IGTs over email should be updated with every new release.

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 December 2020.

Appendix A – Action Log

Action reference	Action Description	Owner	Status
WS20-11-01	BR to speak to Richard Pomroy (WWU) on extending the scope of XRN5218 (CDSP provision of Class 1 read service) to include IGT UNC Supply points in the change to ensure that no supply points are left out of the solution.	BR	New
WS20-11-02	CA to speak with the Joint Office on Digitisation and report back to the Workgroup on the discussions and next steps in December 2020.	CA	New
WS20-11-03	CA to include the workgroups suggestions of the positive aspects and areas for improvement between the IGT UNC and UNC Code Administrators in a report to send to the proposer of UNC676R.	CA	New
WS20-10-01	CA to send out a placement holder for the 5th November 2020 for additional meeting to review the amended version of IGT138 subject to whether significant amendments are made to the modification.	CA	Closed
WS20-07-01	CG to confirm that an Xoserve Change request re IGT Asset Transfers has been raised.	CG	Closed