



IGT UNC Modification Workstream Meeting

Final Minutes

8th October 2020 via Teleconference

| Attendee | Initial | Organisation | Role |
|-----------------|----------------|---------------------|--------------------|
| Anne Jackson | AJ | Gemserv | Chair |
| Cher Harris | CH | Indigo Pipelines | |
| Liam Gallagher | LG | BUUK | |
| Rebecca Cailes | RC | BUUK | |
| Claire Roberts | CR | Scottish Power | |
| Dave Addison | DA | Xoserve | |
| Mark Jones | MJ | SSE Supply | |
| Heather Ward | HW | Energy Assets | |
| Kirsty Dudley | KD | E. ON | |
| 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 apologies had been received from Ellie Rogers (Xoserve) and David Addison would be joining the meeting in her absence. Apologies were also 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. The Chair confirmed the following items for AOB that had been declared.

- XRN5244 (Shared IGT Deeds of Undertaking and CDSP Administration)
- UNC0710 (CDSP provision of Class 1 read service)
- Review of the UNC legal text guidance document
- IGT UNC Meeting arrangements
- Digitisation of the IGT UNC

The Workgroup had no further items of AOB to be declared

3. Approval of the Previous Minutes

The Code Administrator advised that Chris Barker (BUUK) had provided comments under agenda item five, concerning IGT132. The Workgroup discussed whether the proposed amendments were appropriate and recounted the discussion of timeframes within the Modification. The Workgroup

concluded that subject to these amendments the minutes were deemed as a true reflection of the discussion. The Code Administrator resolved to make the Workgroup's amendments to the minutes and made a note to discuss these with Chris Barker offline to ensure he is comfortable with the changes before finalising these post the meeting.

4. Outstanding Actions

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

WS 20/09-01: KF confirmed that Ellie Rogers (Xoserve) had fulfilled the action prior to the meeting. The Workgroup were presented with the following response. Ellie Rogers had confirmed that Transporters themselves manage the Transportation Credit Arrangements with Shippers. Transportation Code Credit Limits are covered under Section V3 of UNC. Ellie had also confirmed that the energy balancing credit rules are applied by the Central Data Service Provider (CDSP) to manage the Gas community's financial exposure and Xoserve specifically manage those arrangements. However, Ellie noted that these rules were currently under review and therefore would be subject to change.

Modification Workgroups

5. IGT132 - Introduction of IGT Credit Code Rules

The Workgroup were presented with the amended Modification and RCI confirmed the outlined changes to the 'Why change' section regarding the credit rules. RCI also highlighted the elements that had been removed in the 'Solution' and the added working example to the appendix and note to the legal text commentary.

RCI further noted that it was the intention of the Proposer to develop a Workgroup report at the next Workstream meeting on 12th November 2020. RCI queried if the Workgroup had any further comments to be reported back to the Proposer of IGT132 on the amended Modification. The Workgroup highlighted a lack of clarity with regards to the timeframes in the new appendix, specifically what 15 day is defined as. RCI confirmed that this would be reported back to the Proposer.

The Chair indicated that the Workgroup report would need to reflect a fair and thorough discussion for the Authority to consider the Modification as this was to enforce credit code rules on IGT UNC and a clear assessment of the benefits should be included because of this.

6. IGT138 – Performance Assurance Techniques and Controls

The Chair opened the discussion on IGT138. CR confirmed that V15 of the UNC674 was currently being developed and would be published by the Joint Office in due course. It was advised that the IGT UNC equivalent Modification was due to be developed further from this and presented to Workgroup on the 12th November 2020 to complete the Workgroup report. The Chair advised that the legal text would be drafted upon receipt of the Modification. The Chair advised that it had become

clear that there was no existing recognition of Performance Assurance (PA) in the IGT UNC beyond a reference to some of the Performance Assurance schedules and, therefore, IGT138 would be implementing new elements to the IGT UNC. The Chair noted that it was therefore necessary to add significant changes to IGT138 to ensure the foundations of Performance Assurance is captured in Code to enable these changes to be overlaid.

KD queried whether this would be captured in the new version of the Modification or in the Workgroup report. The Chair confirmed that it was the intention to publish the amended IGT138 Modification before the next UNC meeting which was scheduled for 21st October 2020. The Chair noted that the latest version of the Modification would incorporate the amendments to UNC674, however, it would be explicit about the additional elements which would be added to the IGT UNC code and the Chair confirmed the legal drafting would be made available also. The Chair confirmed that there will need to be a PA section added to the code with defined terms to give the Performance Assurance Committee jurisdiction to IGT UNC sites. The Chair acknowledged that there will be a final UNC Workgroup meeting on Wednesday 21st October 2020 and encouraged parties to attend that to express any opinion they may have on the UNC solution. The Chair indicated that following this meeting the Modification would be presented to the UNC Panel and then issued for consultation.

The Chair confirmed that there may be an additional IGT UNC scheduled meeting to allow parties to properly review any changes made to the IGT UNC once the amended Modification was applied. The Chair indicated that the need for an additional meeting would be due to the amount of significant changes identified.

The Chair advised that a placeholder would be sent to parties for a chosen date to avoid any clashes with calendars and confirmed it was the intention to develop a Workgroup report on 12th November 2020. The Workgroup discussed potential dates which would be suitable for all parties and confirmed that 5th November 2020 would be the most suitable.

20-10-01- 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.

Workgroup Report

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

The Chair opened discussions around the Modification and confirmed that it had been amended and the legal text had been added. RCI reminded the Workgroup on the progress of the Modification to date. RCI noted that the initial Modification proposed closely resembled the UNC equivalent (UNC664V Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4). RCI explained it had been highlighted at the IGT UNC Panel on 25th September 2020, that the IGT UNC solution was different from the UNC and, therefore, a distinction was made in the IGT UNC Modification to reflect this. RCI explained IGT145 was introducing a crossover to the UNC business

rules. RCI highlighted that the Panel had determined that the governance proposed was also changed from Authority decision to Self-Governance as the IGT UNC Panel agreed (with Ofgem's consent) that it didn't have the same material impact on the IGT UNC as the UNC. KD commented that this also highlighted why the Modification was a Self-Governance decision as it was to just point into the already approved sections in the UNC. This was supported by MJ, MJ highlighted that the UNC Modification had also changed in the reference from 0664 to 066V and this was now incorrect. The Code Administrator noted the update and resolved to change references to UNC664V throughout the document.

KD noted that the equivalent UNC Modification had not yet been sent to the Authority for a decision and queried whether the IGT UNC Modification would be determined prior to it due to the different routes of governance and the timescales determined by them. RCI confirmed that the 0664V Consultation deadline was on 12th October 2020 and would be presented at the October 2020 Panel where a determination would be made. RCI further explained that the IGT UNC Modification would progress to the next Panel meeting on 23rd October 2020 and then issued for a 15-Working day consultation which would end on the 16th November 2020. RCI queried whether the Workgroup was comfortable with this timeframe or whether they felt it need to be deferred to ensure flexibility. The Workgroup discussed whether the Modification should be deferred at Panel should a determination has not been made on the 0664V Modification. RC queried how many times a Modification could be deferred at Panel.

RCI confirmed that it was the Panel's prerogative on how many times a Modification could be deferred at Panel. RC confirmed that it could be noted in the Workgroup report that parties would recommend this Modification to proceed providing a decision had been made on the UNC equivalent. MJ acknowledged this as a fair challenge and noted that it was unclear whether it would be approved quickly by the Authority. RCI led the Workgroup through the Workgroup report considering the discussion regarding the timeframe and the difference of approach of the two Modifications. RCI recorded this discussion under the Governance section in which Workgroup noted that they supported the proposed route of Governance. The Workgroup supported the solution and discussed the consumer impacts highlighted within the Modification and discussed whether this was applicable to IGT UNC Supply points. The Workgroup progressed through the Workgroup report and supported the proposers view that the Modification had a positive impact on Relevant Objective D. The Workgroup discussed the implementation and established that all three changes (IGT UNC, UNC and DSC) should have linked implementation dates and that this was estimated as November 2021. The Workgroup noted that the driving factor in implementation is the XRN change proposal and that implementation should be discussed in the Data Services Contract (DSC) Change Management Committee. The Workgroup discussed the possibility of deferring the implementation date at the IGT UNC Panel until the XRN4990 change had been better developed. The Workgroup noted that there should be enough notice from both Code Administrators to ensure industry have enough time to implement the transitional legal text of the change.

RCI concluded the Workgroup report and noted that this would be sent to the October Panel meeting for a decision on its consultation.

Pre- Modification Discussion

8. IGT147- Updating Specific Gender References to Neutral terms

The Workgroup were introduced to the new Modification by the Proposer. KD confirmed the basis of the Modification was to address gendered terms within code. KD confirmed that RCI had done an initial review of the IGT UNC and found 60 references throughout Code. KD queried whether the Workgroup felt it was an appropriated time to raise this Modification due the potential additional work created by the Pandemic. Furthermore, KD queried whether Workgroup believed that this Modification should follow a fast-track route rather than standard governance procedures as the Modification was not amending the intent of the code however just the drafting. KD noted a pre-Modification was also tabled at the UNC Panel Meeting and it was felt that parties wanted to do a final scan to ensure everything was reviewed properly and that any changes made should be considered for its relevance. The IGT UNC Workgroup members supported the proposed route of the proposer recommending sending the modification straight to Consultation and that the group were comfortable that his didn't need a further Workgroup discussion, however, did not believe there was material for a fast track route as felt it did not meet the criteria. The Workgroup discussed the proposed timetable and work required to facilitate the Modification. KD indicated that it was pragmatic to have enough time to properly consider the legal drafting for the Modification and discuss this with the Code Administrator offline.

Operational issues

9. Reporting between the CDSP and the DTSA

KD open the discussion and outlined the charging process Data Transfer Service Arrangement ((DTSA) as it currently operated and explained that the DTSA would contact individual Suppliers which utilise the Data Transfer Network (DTN) and ask them to provide a list of the customer in order to invoice the Supplier the correct fee. KD noted that this process was cumbersome as parties have not always provided the correct data and there is not always a validation. KD noted it was the intention to obtain a centralised report from the CDSP which would provide this information, therefore, ensuring the process isn't reliant on Industry. KD further noted that Electralink, as the SPAA Code Administrator, received a similar report to support invoicing, however, do not have the permissions to share this information under the DTSA. KD confirmed it was the intention to develop its own sharing arrangement with the CDSP and DTSA. KD confirmed that this was to be presented at the UNC Distribution Workgroup and that it would be presented to the Contract Data Committee and that it was the intent to present it to different arenas as this would be accounts of different MPRNs across all sites (DNs and IGTs). KD indicated that any further comments should be put forward before the end

of October 2020 direct to E.ON. The Workgroup discussed the scenario of which a Modification was required to facilitate this request and concluded this would be subject to comments.

10. Party engagement

RCI lead the discussion on the party engagement and initially highlighted the current quoracy issues within the ITG UNC. RCI outlined the presented paper which described in further detail about a survey that was conducted in February 2020, RCI noted that this survey did not have a good return, therefore, does not effectively show a lot of information. RCI confirmed further measures taken in the past year to address the issue of quoracy. RCI highlighted a comment raised in a previous meeting by Liam King (Ofgem) querying if the core issues of a lack of engagement had been identified as this was imperative to tackle the problem. Therefore, it was the intention of this meeting to identify any visible trends which are barriers for engagement.

RCI recapped on the main things that was identified back in February was potentially a knowledge gap and, therefore, parties did not want to be vocal. KD referred back to a comment made in the initial discussion that it could be a good sign in that the service provided it doing well, therefore, parties do not feel they have to be involved. CH also further noted that newer parties may not be as likely to apply themselves due to either lack of resource or they simply do not see the value in attending. The Workgroup discussed further potential influences and the benefit of personalised phone call. However, noted that although this may have more success than a further survey, it may still not yield the answers that are needed.

The Workgroup noted that some parties Business Models may not support active engagement in all codes as regulation teams are being reduced or prioritised.

KD queried whether adding this theme to the annual Code Administration survey would be beneficial as their reach is wide and it is published via Ofgem. RCI noted that this is something she would put to the relevant parties, however, noted that Code Administrators where not asked for input in the last survey.

The Workgroup offered questions that may be useful to ask parties including;

- Why are you not actively attending IGT UNC meetings?
- How do you follow IGT UNC business?
- Engagement is low in Code meetings, what can we do as the Code Administrator to support you being engaged.

KD queried whether this had been raised at the CACoP meeting. RCI noted that it had, although no active work had been carried out in this area. RCI resolved to add this as AOB to the next CACoP meeting.

RCI thanked the Workgroup for their comments and resolved to take these away to think about a forward plan.

11. Know issue register

RCI confirmed that the Known issues register has been updated with the most relevant position of all issues and the Workgroup agreed that as there was nothing specifically to discuss and review that this could be revisited in the next Workgroup meeting.

12. Cross Code

RCI addressed Modification UNC0734 (Reporting Valid Confirmed Theft of Gas into Central Systems) and confirmed that a discussion had been had with the the SPAA representative providing support on this Modification with regards to cross-code impacts. It had been established during discussions on the solution and the intention of the Modifications reach that it would not require an IGT UNC Modification at this time. KD agreed that this did not relate to a lot of the IGT UNC, however, challenged that IGT thefts still do need to be reported and, therefore, continuing to monitor this Modification would be appropriate. RCI confirmed that they had reached this conclusion as the Modification outlines that the obligations are being placed on the Supplier regardless of site. The Workgroup resolved to keep this on the tracker as there is still development of the solution to be carried out in the UNC and that it could not be concluded at this stage that it would not have an impact.

The Chair also confirmed that in regard to Modification UNC0730, that it had been determined that an IGT UNC equivalent Modification was not required.

The Chair also drew attention to Modification UNC0710 and confirmed that the Modification was currently out for consultation and this was due to close on the 8th October 2020. The Chair confirmed that ESP would be raising a Modification which would be presented to the IGT UNC Panel in October and that this would resolve any cross-code implications.

KD highlighted a new Urgent Modification which would be raised by E.ON in the near future to amend the Formula Year AQ due to the implications of COVID 19 and to avoid any mid-year charges and increase of AQ amendments. KD confirmed E.ON were in the process of developing the UNC Modification and that an IGT UNC Modification was also to be raised to ensure all legal text impacts would be accounted for. KD noted that this Modification would be seeking urgency status.

13.AOB

XRN5244 (Shared IGT Deeds of Undertaking and CDSP Administration)

KD informed the group of a new XRN which concerned the IGT accession process and asked parties to pay attention to any potential implications that could affect suppliers should it be approved. RC stated that the XRN was to provide a simpler onboarding process for new suppliers as the current

process was long and cumbersome. KD noted that this had been raised for visibility and that as there were implications to Suppliers it may be beneficial for this to be raised at the next SPAA Expert Group. RC resolved to submit this as an agenda item on the next SPAA Expert Group.

Review of the UNC legal text guidance document

The Chair highlighted the next discussion for AOB as the UNC review of principles by which the UNC legal drafting is based upon and the Chair confirmed this is an annual event and that parties were currently reviewing them. The Chair noted that currently the Principles do not take the IGT UNC into consideration and indicated that they should be considered due to the interoperability of the codes, this was also supported by Workgroup members. The Chair stated it was the intention to highlight this within a response on behalf of IGT UNC and invited parties to also comment. The Workgroup noted that they had not received the invitation to comment from the Joint Office. The Chair noted that the distribution of the email did not look to be closed and noted that permission would be sought from the Joint Office to circulate this to Workgroup members.

Post Meeting Note:

Following the meeting it was discovered that comments were only being sought from the UNC Panel attendees for this document. As per the minutes of the September UNC Panel meeting the following AOB was captured; c) Legal Text Guidance Document – Annual Review RH reminded Panel that PG had previously requested feedback from Panel Members though none had yet been forthcoming. It was agreed the Joint Office would re-circulate the document and seek responses before the October meeting.

IGT UNC Meeting arrangements

The Chair then moved on to the final AOB regarding responding to IGT UNC Meeting information. KF lead the discussion and stated that it had been identified by the Code Administrator that parties often didn't confirm their attendance in advance, and this has led to parties attending meetings that we are unaware of. KF requested if it was possible for parties to indicate their attendance early to ensure good administration practises. KD suggested that it was difficult to know whether they would be able to join the meeting until the Morning of and that it could possibly work better if the Link to the teleconference was published on the website. The Workgroup discussed whether making this mandatory could affect attendance and whether it benefitted parties if a more flexible approach was taken. KF acknowledge and confirmed it would be discussed further offline.

.Digitisation KD noted that this may be a discussion for Panel as it was addressing how the IGT UNC could approach digitisation. The Workgroup discussed suitable approaches for this discussion whether it should be brought initially to Panel and a Review Group be developed. KD explained that a Review Group may not be applicable as this was a technical subject. The Workgroup concluded that this could be presented at Panel as 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, 12th November 2020.

Appendix A – Action Log

| Action reference | Action Description | Owner | Status |
|-------------------|---|-------|--------|
| 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 | New |
| WS20-09-01 | Ellie Rodger is to consult an IGT UNC advocate within Xoserve and confirm whether Xoserve service the credit code rules between Large Transporters | ER | Closed |
| WS20-0-01 | CG to confirm that an Xoserve Change request re IGT Asset Transfers has been raised. | CG | Open |