

20-11-EX IGT138 - Performance Assurance Techniques and Controls – Additional meeting

Final Minutes

30th November 2020 via Teleconference

Attendee	Initial	Organisation	Role
Anne Jackson	AJ	Gemserv	Chair
Cher Harris	CH	Indigo Pipelines	
Rebecca Cailes	RC	BUUK	
Heather Ward	HW	Energy Assets	
Claire Roberts	CR	Scottish Power	
Kirsty Dudley	KD	E. ON	
Catherine Mulliss	CM	E.ON	
Rachel Clarke	RCI	Gemserv	Code Administrator
Amie Lauper-Bull	ALB	Gemserv	Observer

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the additional Workgroup meeting for IGT138 (Performance Assurance Techniques and Controls), which had been called to give the industry additional opportunities to review extensive changes that had been made to the Modification. The Chair also noted that a draft of the legal text had been published for discussion at the meeting. The Chair noted that no apologies were received prior to the meeting.

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 Workgroup had no further items of AOB to be declared.

3. Draft Amended Modification Proposal (IGT138)

The Chair presented the amended Modification Proposal to the Workgroup, noting that the changes made in the Modification were to better reflect the intention of the solution and to make clear what was being implemented by UNC674 and what was being implemented in the IGT UNC. The Chair noted that the date for the next UNC674 Workgroup meeting had been confirmed as 7th January 2021 and, therefore, the latest version of the Modification would not be made available until the end of this year (2020). The Chair noted that the drafting included in this version of the IGT UNC Modification was based on v14 (7th September 2020).

The Workgroup discussed the timetable. KD noted that the Panel may wish to delay the Modifications consultation period to ensure that it was released and ran to the same time as the UNC Modifications. KD noted the heavy dependency on the solution of UNC674 and noted that it would be beneficial for

the industry to consider the Modifications alongside each other when returning their responses to the respective Code Administrators. The Workgroup agreed with this approach.

KD queried whether IGT138 would still be needed if UNC674 was not to be implemented, as the regime would still need to be implemented in the IGT UNC. The Chair noted that there would still be a need to implement the existing UNC regime for Performance Assurance into the IGT UNC. The Chair noted that it may have been the case that because data was provisioned for in the IGT UNC, with IGT data feeding into the Performance Assurance Report Registers (PARR), parties were under the impression that the Code included all elements of Performance Assurance (PA). The Proposer noted that this would be discussed internally, however, would not be a consideration at the moment.

The Workgroup discussed the Governance proposals in the Modification and noted that the additions carved out that the existing Performance Assurance regimes were being added into the Code as well as UNC0674 changes being layered over the top. The Workgroup agreed with the Proposer's suggestion that it should be an Authority decision on this basis, as well as adding the ability for PAC members to raise changes to the IGT UNC, which differed from the current processes.

The Chair noted that the new Solution section was much shorter than the previous version and that the UNC Solution had now been moved into an Appendix in its entirety. The updated Solution included only the business rules that were pertinent to the IGT UNC. The Workgroup discussed that the Performance Assurance Framework Document (PAFD) had the ability to be changed by the PAC without the need to be put through the current change processes. The Workgroup highlighted that there was an area of risk that changes made to that document would not have industry-wide visibility and therefore there may have been occasions where there were IGT UNC consequences that were not identified. The Workgroup discussed how this could be mitigated and suggested to the Proposer that a checklist or mechanism should be put into the PAFD to ensure that all implications for change were considered before being implemented. CR resolved to take this away and liaise with the Proposer of UNC674. The Workgroup discussed that there may be a gap between the Solution and the Legal text for solution point five 'Parties to be subject to the Performance Assurance Techniques described in PAFD' as this is not currently included in the text. In light of the discussion on how the PAFD can be amended, and therefore the techniques which are included, it was decided that rather than add this into the IGT UNC and present a risk to the efficiency of the Code, the solution should be changed to amalgamate points four and five to ensure this is captured in the legal text under the current drafting.

20-11-EX-01- CR to liaise with the Proposer of UNC674 to discuss whether a mechanism can be introduced in the PAFD to ensure cross-code implications are actively considered.

The Workgroup discussed the Relevant Objectives. The Workgroup discussed whether Relevant Objective D applied to the IGT UNC Modification, or whether this was more suited to the Solution in UNC674. The Chair noted that Performance Assurance looked at the accuracy of Settlement in Gas. The Chair noted that the information sent for the IGT sites helped in accuracy of the Distribution Networks (DN) element of Settlement in the UNC. That would therefore impact consumers and an

effective Competition through that process, as data could not be distinguished between the GT and IGT sites. The Proposer noted that opinions on this could be drawn out through consultation.

The Workgroup discussed the implementation suggestions made by the Proposer. The Workgroup noted that there may need to be more details added to this section to include some transition rules around implementation. The Workgroup discussed that there needed to be more information given regarding how the transition would be managed and that clear indications for dates should be made available. The Workgroup noted that in September 2020, a request was made in a UNC674 Workgroup that a target delivery date (considering release strategies), release plan and a communications piece to understand the movement of one regime to an updated one, were all provided for clarity. The Proposer resolved to take this away and liaise with the Proposer of UNC674.

4. Legal Text drafting

The Workgroup reviewed the drafted legal text and carried out a comparison with the proposed Solution to ensure any gaps were identified. The following observations were made:

- Typographical errors were identified in the numbering of clause 1.1. The Code Administrator resolved to review and amend these accordingly;
- Definition of Performance Assurance Party should be added to ensure all definitions are complete. The Workgroup noted that the definition in the UNC was hidden within the Performance Assurance Objective in Transportation Principal Document (TPD) V16.1.1;
- Definition of Performance Assurance Framework Document should be amended to change the acronym from 'PAF Document' to 'PAFD' to reflect how industry reference the document;
- The acronym 'PAC' should be included in the definition of Performance Assurance Committee in Part M; and
- 'Decisions of PAC' was made explicit in the legal text drafting.

The Workgroup acknowledged that at this point the legal text was still in motion, as a further version of UNC674 would be published in December 2020.

5. Workgroup Report

RCI lead the Workgroup through the Workgroup report for IGT138, noting that this report would be considered again at both the December and January Workgroup meetings. The Workgroup worked through the sections of the Workgroup report as per the discussions outlined in agenda items three and four.

6. AOB

None.

The next Workgroup meeting is scheduled for Thursday, 10th December 2020.

Appendix A – Action Log

Action reference	Action Description	Owner	Status
20-11-EX-01	CR to liaise with the Proposer of UNC674 to discuss whether a mechanism can be introduced in the PAFD to ensure cross-code implications are actively considered.	CR	New