



IGT UNC Modification Workstream Meeting

Draft Minutes

10th December 2020 via Teleconference

Attendee	Initial	Organisation	Role
Anne Jackson	AJ	Gemserv	Chair
Cher Harris	CH	Indigo Pipelines	
Chris Barker	CB	BUUK	Items 1-5 only
Rebecca Cailes	RC	BUUK	
Brandon Rodrigues	BR	ESPUG	
Heather Ward	HW	Energy Assets	
Claire Roberts	CR	Scottish Power	
Kirsty Dudley	KD	E. ON	
Ellie Rogers	ER	Xoserve	
Rachel Clarke	RCI	Gemserv	Code Administrator
Amie Lauper-Bull	ALB	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.

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 business to add.

3. Approval of the Previous Minutes

20-11

RCI informed the meeting that no comments had been received on the minutes of the previous meeting. BR noted that his surname ends with an S. The Code Administrator resolved to make the amendment. No further comments were received and the minutes, subject to the additional change, were approved as an accurate reflection of the meeting.

20-11-EX

RCI noted that comments had been received prior to the meeting, advising that three areas had been amended to accommodate the changes. The changes can be found [here](#).

The Workgroup agreed the changes and resolved to approve these minutes as an accurate reflection of the meeting.

4. Outstanding Actions

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

20-11-EX: CR noted that the discussions regarding adding additional mechanisms into the Performance Assurance Framework Document (PAF Document also referred to as PAFD) had been passed on to the Proposer of UNC674 (Performance Assurance Techniques and Controls) and internal discussions are taking place to consider this. CR advised that this action could be closed.

WS 20-11-01: BR noted that this action could be closed as Richard Pomroy (WWU) had amended XRN 5218 to include IGTs in the scope of that modification.

WS 20-11-02: RCI resolved to update the Workgroup on this action during agenda item nine, although advised that this action would remain open.

WS-20-11-03: RCI noted that the comments from the previous meeting, regarding the positive ways of cross-code working and areas of improvement, had been compiled into a report which was due to be sent to the Panel in December 2020. Following this, it was hoped that the report could be sent to the Proposer of UNC676R (Review of Gas Transporter Joint Office Arrangements). RCI noted that this action could be closed.

Modification Workgroups

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

The Chair noted that, following a decision by the IGT UNC Modification Panel to send this Modification back to the Workgroup for further discussions, the Workgroup was tasked to readdress the Modification Consumer Impacts. The Chair noted that a new framework would be trialled for this item, to facilitate discussions. This was an initiative that Code Administrators Code of Practice (CACoP) was hoping would be adopted into all Code Modification Reports for all Codes.

RCI lead the Workgroup through the new framework noting that the new framework included two free text questions and a table similar to the Relevant Objects, which asks for a 'positive', 'negative', or 'none' response. The Workgroup discussed the first question: 'What is the current consumer experience?'. The Proposer noted that, at that moment, the Consumer was not impacted as businesses were absorbing the debt and it was not being passed through. The Modification looked to reduce the risk where consumers could be impacted, should Supplier of Last Resort (SOLR) events happen in the future. The Workgroup discussed that there may be unforeseen indirect impacts on Consumers in some scenarios and queried whether the Workgroup were confident that there would be no impacts on the Consumer. The Workgroup noted that it could not be categorically confirmed that there would not be any impacts.

The Workgroup discussed the second question: 'What would the new consumer experience be?'. The Workgroup discussed the new Consumer experience and noted that the Solution looked to safeguard Consumers in the future. The Proposer noted that the solution would act to minimise the risk on IGT

parties of potential financial impacts. The Proposer noted that protection of the Transporter would protect the Consumer. The Proposer noted that in the Transporters licence conditions it states that sufficient credit cover should be obtained, therefore, protecting the Consumer costs. An IGT supported this by noting that if an IGT party went out of business, the Consumers' gas supplies could be impacted. Therefore, securing the IGTs business via these protections, protects the security of a Consumer's gas supply. Another IGT noted that within the proposed solution within the modification most costs incurred in a SOLR event would be recovered through these new rules.

A Shipper member noted that if the scenario were normal, the Consumer would not be impacted. However, if a SOLR event were to occur or multiple parties went out of business, there would be areas for concern as the Consumer could be impacted.

The Workgroup discussed whether there were enough similarities in approach in the electricity market to adopt a joined-up approach. BR noted that the process in electricity for an Independent Distribution Network Operator (iDNO) is different as an iDNO would charge a Supplier directly. An IGT would only charge the Shipper and therefore the IGT would not get any visibility of how that cost would get cascaded down to a consumer.

RC queried whether these proposed rules were linked to a UNC687 (Creation of new charge to recover Last Resort Supply Payments), which was being held by Ofgem for a possible licence change. KD noted that although this was a similar scenario, it was different in its topic. CB noted that IGTs were not included in the scope of that Modification.

The Workgroup worked through the Consumer Benefit Analysis table ([please see Workgroup Report v3 for full analysis](#)).

The Workgroup agreed that this Modification should be sent back to the Panel for further consideration on Consultation. KD noted that due to the time of year and annual leave over the next few weeks, the Panel may want to consider an extended consultation window. RCI noted that the Code Administrator could recommend this to the Panel as a Workgroup suggestion. The Workgroup agreed and proposed that the Panel consider an extension to the end of January 2021 for this Modifications Consultation.

The Workgroup noted their feedback on the new Consumer Benefit Analysis process and noted that a 'Neutral' option should be added to the table to ensure that this option can be available as per the outcome of one of these options in the IGT132 analysis. KD noted that the more robust analysis was good and the right thing to do, however, noted that in some Codes there will not be direct consumer impacts. KD noted for example that in the IGT UNC, unless the Modification is looking at Metering the impacts on consumers will likely always be indirect. Another Workgroup member noted that there may be always be impacts on Consumers.

RCI noted that feedback and resolved to take this back to the Chair of the CACoP and the IGT UNC Panel for further consideration.

CB left the meeting.

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

BR updated the Workgroup on the status of IGT148 following the discussions with Richard Pomroy (WWU) on updating XRN5218 (CDSP provision of Class 1 read service) to include IGT supply points. BR noted that there may be a need to refine the solution once further development had happened with the XRN. BR noted that the solution was straightforward, with some basic administrative aspects to take references out of the code and with the framework being amended through the Data Services Contract (DSC).

The Chair noted that originally the service was provided by the Distribution Networks (DNs), and the Shippers were required to get the reads from the DN's. The Chair noted that in the solution of UNC710 (CDSP provision of Class 1 read service), there had been a shift in responsibility of the service and asked the Workgroup where the shift had gone to. ER noted that it would no longer be the DN's' responsibility to provide the service and that this requirement had now been placed on the Central Data Services Provider (CDSP) to procure that service on behalf of DN's. ER noted that it would be the CDSP who would have the contract with the Data Management Service Providers (DMSP), in order to obtain the reads for Shippers.

The Chair queried how the CDSP was obligated to provide the service. ER noted that XRN5218 would develop this obligation, however, it would be included in the DSC as a new service line. The Chair highlighted that as the CDSP was not a signatory to the UNC or the IGT UNC, it would not be as straightforward to shift the responsibility onto the CDSP in the IGT UNC. The Chair noted that in the UNC Document (IGTAD) there were two clauses one of which obligates IGT's to obtain DM reads for IGT sites and the other obligates the DN's to provide the service for the IGT's. UNC710 removed the DN obligation, however there is a clause that remains in the text which states that the IGT's are still required to obtain the reads. The Chair noted that the only reason DM reads are obtained in the IGT UNC was that they were required by these clauses in the IGTAD. IGT's did not need the data for their own charging processes. The Chair queried whether there would need to be something added into the IGTAD to ensure that the legal hook remained for obtaining the reads and therefore the requirement for the service. ER noted that this may not work as it would not be consistent with the DN's approach.

KD queried whether XRN5218 could be more widely published to give parties the comfort that most of the work on this issue would be taken care of there. ER resolved to speak with the team to try to accommodate this request.

CH queried whether the obligation could be removed from the IGTAD. ER noted that if IGT148 was withdrawn, IGT's would not be included in the scope of XRN5218 as the governance would not be there to include them in the change.

The Chair queried whether the intention of the Modification was to remove the responsibility off the IGT to provide the service, as was the solution of UNC710. BR noted that this was the intention of the

Modification as it sought parity with the UNC. The Chair noted that if the references in the IGTAD were substituted from DN to CDSP, that would be a solution which would work legally, however the responsibility would still remain on the IGTs to provide the service.

BR resolved to meet with the Code Administrator and IGTs before the next meeting to discuss the solution further to refine it. The Chair noted that following such meeting, the first draft of legal text could be developed with the aim to bring it to the next meeting. ER requested to be kept up to date with the development of the Modification as it could have impacts on XRN5218.

ACTION WS20-12-01: BR to meet with IGTs and the Code Administrator before the next meeting to refine the solution for IGT148 (Provision of Class 1 meter read service on IGT networks by the CDSP) following the discussion at the 20-12 Workstream meeting.

7. IGT138 - Performance Assurance Techniques and Controls

The Chair noted that the updated version of the UNC674 Modification (Performance Assurance Techniques and Controls) had yet to be published on the Joint Office website, therefore the Code Administrator had been unable to update the IGT UNC Modification to reflect these latest changes. The Chair noted that the final Workgroup meeting for UNC674 had been scheduled for 7th January 2021, i.e. a week before the IGT UNC Workstream meeting and the external paper day for the final agenda and papers for that IGT UNC meeting. The Chair noted that as a result of the UNC674 Workgroup, it was likely that the Code Administrator would be publishing any subsequent IGT138 papers late, however the Workgroup report was already largely completed and the IGT UNC has caught up with the UNC equivalent due to the additional meeting held in November.

RCI presented the updated Modification and legal text to the Workgroup, noting the additions made following development at the meeting on 30th November 2020. KD queried whether in clause 8.2 the reference to 'Party' should be 'Performance Assurance Party' in order to be consistent with an earlier change. RCI noted that this clause was a direct 'lift and shift' from the UNC, which had been adapted for the IGT UNC. RCI resolved to review this in light of the changes.

ACTION WS20-12-02: CA to review clause 8.2 in the amended legal text for IGT138 (Performance Assurance controls and techniques) to assess whether the use of 'Party' of 'Performance Assurance Party' is correct.

KD added that, although not included in this version of the drafting for IGT138, there had also been discussion about adding transitional rules and about what may need to be done if UNC674 does not get implemented and whether the current performance assurance regime should be added to the IGT UNC.

CR noted that both issues had been raised internally with the proposer of UNC674 and that transitional rules were being considered alongside other suggested amendments. CR also noted that

if UNC674 was not implemented, Scottish Power would not sponsor another Modification to add the existing regime into the IGT UNC, although acknowledged that this should be done.

CR noted that there were six actions that were taken away from the November meeting and that they would send updates on these to the Code Administrator to be captured in the minutes.

8. Party Engagement Discussion – Digitisation of the IGT UNC

RCI updated the Workgroup on the status of the work in this area. RCI noted that more work was needed to refine what IGT UNC Digitisation would involve and suggested that this be further explored at the January 2021 meeting.

RCI updated the Workgroup on the outstanding action to approach the UNC with regards to their Digitisation strategies and considering a joined-up approach. RCI noted that it would be beneficial to ensure that there would be a clear vision for IGT UNC Digitisation before going to the Joint Office, as discussions may be diminished if there had not been sufficient discussion in that area. RCI noted that conversations needed to be had with all relevant parties before this action could be closed and that this may take some time to complete.

KD noted that if the Joint Office did not want to take forward a joined-up approach, this may be appropriate to raise under the Governance workgroup in order to champion this in the UNC. KD noted that as previously stated, there could be big efficiency gains if the codes were digitised and could potentially negate the need to amalgamate the codes.

HW noted that the Retail Energy Code (REC) portal was in the concept stage and that it would be prudent to engage with the REC Code Manager to ensure any digitisation in the IGT UNC would be compatible.

9. Cross-Code Modification Implications Tracker

UNC746 - Clarificatory change to the AQ amendment process within TPD G2.3 (formally UNC736A)

RCI updated the workgroup on the status of UNC736A, which had had its reference number reallocated to UNC746 following a decision at Panel to uncouple UNC736 and UNC736A. RCI noted that it was still anticipated that this modification would not have an impact on the IGT UNC, however, it was prudent to monitor this. ER noted that the solutions were almost identical to UNC736, however, UNC746 included the retrospective element. RCI noted that the latest legal text was reviewed for UNC736 prior to consultation and there were no IGT UNC impacts.

UNC747 - Amendment of reference from AIGT to INA within the UNC

RCI noted that UNC747 had been raised by BUUK after the collation of the current cross-code tracker. RCI explained that this Fast-Track Modification was currently out for consultation and sought to change references to AiGT (Association of IGTs) to INA (Independent Networks Association) after the AiGT and the equivalent electricity Trade Association had merged. RCI noted that in the Modification, it stated that there were no references in the IGT UNC to AiGT, however, there was one reference in L2.1. This reference was proposed to be changed in the solution and legal text of IGT140 (Changes to Panel rules) which had been sent to the Authority for decision. RCI concluded that if IGT140 was not successful, a Fast-Track Modification should be raised in the IGT UNC to amend this reference. KD noted that this should be added to the Known Issues Register (KIR) to ensure that this issue would be dealt with if IGT140 did not get implemented.

UNC734S - Reporting Valid Confirmed Theft of Gas into Central Systems

KD noted that, following the development of the Modification, there was a concern that there may be a gap in the IGT market if a mirror modification was not raised in the IGT UNC. KD noted that this Modification sought to obligate Shippers to input confirmed thefts into central systems across all supply points and that it was not clear at that moment whether IGT sites were captured.

ER noted that there would be system changes for this Modification and that these would be applied across all sites. The Chair noted that if there were no obligations in the IGT UNC, then the systems would have to be designed to explicitly exclude IGT sites and that there were efficiency gains in introducing the obligation into code.

KD noted that a Modification in the IGT UNC may only need to point across to the UNC, however, this had not yet been discussed. KD noted this would be raised at the next Distribution Workgroup. RCI resolved to speak to Fraser Mathieson from the Supply Point Administration Agreement (SPAA) on this further following the discussion.

ACTION WS20-12-03: CA to speak to Fraser Mathieson (SPAA) on UNC743S to ensure that IGT sites are being considered in the solution for this Modification.

UNC730 - COVID-19 Capacity Retention Process

ER noted that a variation request had been raised for UNC730 and this would introduce new business rules, which may have impacts on the IGT UNC. ER added that there has been an XRN change, XRN5285 (COVID-19 Capacity Retention Process) raised for this Modification which cited IGT impacts.

The Chair noted that from previous discussions with the Proposer of UNC730, there had been a question around whether the capacity reduction proposed would include capacity charges for Connected System Exit Points (CSEPs). ER noted that the tweak to one of the business rules was to allow a set number of days to be able to declare that sites had been isolated due to COVID-19 in order to get the 50% capacity relief on that site. ER noted that this was not just retrospective and could be used for new sites that were isolated in this way.

ER noted that the system changes would be manual as the inputs would also be manual. ER added that the XRN change that had been raised, as well as UNC730, would be implemented straight after an Authority decision, which could be as early as March 2021. ER noted that this would be an extraordinary release due to the nature of the system change.

The Chair noted that if there were to be IGT UNC impacts, the Modification raised could run as Self-Governance as it would be dependant on the implementation of the UNC modification, thereby ensuring that it would catch up with the implementation of the UNC change. This was due to the framework of the solution having been developed in the UNC, so there would be no material change as there would be with UNC730.

KD noted that the updated legal text and Modification were currently on the UNC website. The Chair resolved to investigate this and review the necessary papers to assess the likelihood of IGT UNC impacts. The Chair added that any findings would be brought back to the next Workgroup meeting in January 2021.

ACTION WS20-12-04: CA to reassess UNC730 (COVID-19 Capacity Retention Process) for its potential impacts on the IGT UNC following a Variation to the Modification's business rules and legal text. CA to come back with findings to the January 2021 Workstream meeting.

The Workgroup acknowledged the update and had no further comments.

10. [IGT UNC Known Issues Register \(KIR\)](#)

RCI noted the KIR had been updated to reflect the current position of issues. References to Association of Independent Gas Transporters (AiGT) in the IGT UNC was added to the KIR to ensure that if IGT140 did not get implemented, this was not lost. The Workgroup had no further comments on the register.

11.AOB

IGT131 - Automatic updates to Meter Read Frequency

RCI noted that IGT131 was the IGT UNC equivalent Modification of UNC692 and that this had been appealed following a UNC Panel decision to implement this Modification in the UNC. The appeal went to Ofgem, who had reviewed this for some time before returning a decision. RCI noted that the decision was published on 18th November, which upheld the Panel decision. RCI noted that, following the development of IGT131, it was determined in December 2019 that the legal text drafting for UNC692 would capture all IGT obligations, therefore, there would be no need for the legal text to be changed in the IGT UNC. This position had been reviewed following the Ofgem decision and the analysis remained the same. It was noted that UNC692 was currently awaiting a discussion on its implementation at a DSC Change Management Committee. RCI noted that when the time was appropriate, the proposer of IGT131 would withdraw the Modification.

KD added that the communications for this process should be clear, as the withdrawal of the Modification may confuse parties who have not kept up to date on the change and when or how this would impact IGT Supply Points. The Code Administrator resolved to ensure that two different communications would be sent out, one at the time of publication of the UNC Notice of Implementation and secondly on the withdrawal of IGT131, emphasising that UNC692S would still be applicable within the IGT UNC.

The next Workgroup meeting is scheduled for Thursday, 14th January 2021.

Appendix A – Action Log

Action reference	Action Description	Owner	Status
WS20-12-01	BR to meet with IGTs and the Code Administrator before the next meeting to refine the solution for IGT148 (Provision of Class 1 meter read service on IGT networks by the CDSP) following the discussion at the 20-12 Workstream meeting.	BR	New
WS20-12-02	CA to review clause 8.2 in the amended legal text for IGT138 (Performance Assurance controls and techniques) to assess whether the use of 'Party' of 'Performance Assurance Party' is correct.	CA	New
WS20-12-03	CA to speak to Fraser Mathieson (SPAA) on UNC743S to ensure that IGT sites are being considered in the solution for this Modification.	CA	New
WS20-12-04	CA to reassess UNC730 (COVID-19 Capacity Retention Process) for its potential impacts on the IGT UNC following a Variation to the Modification's business rules and legal text. CA to come back with findings to the January 2021 Workstream meeting.	CA	New
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	Closed
WS20-11-02	CA to speak with the Joint Office on Digitisation and report back to the Workgroup on the discussions and next steps.	CA	Open
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	Closed