

## IGT UNC Modification Panel Meeting

### Draft Minutes

Friday 26<sup>th</sup> February 2021

Via teleconference

Attendee	Initials	Organisation	Representing	As
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Roberta Fernie	RF	Ofgem	Authority	
Claire Roberts	CR	Scottish Power	Pipeline Users	
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Rebecca Cailes	RC	BUUK	Pipeline Operators	Alternate for Jenny Rawlinson (BUUK)
Carine Russell	CRu	Last Mile	Pipeline Operators	
Rachel Clarke	RCI	Gemserv	Code Administrator	
Amie Lauper-Bull	ALB	Gemserv	Code Administrator	

#### 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 confirmed that no apologies were received prior to the meeting and noted that Rebecca Cailes (BUUK) is attending the meeting as Alternate for Jenny Rawlinson (BUUK).

#### 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. There were no further items of AOB added by the Panel.

#### 3. Approval of the previous minutes (21-01 and 21-01 Reconvened)

The Chair informed Panel that no comments had been received on both sets of minutes before the meeting. The Panel had no further comments to add and the minutes were approved, subject to the suggested change as a true reflection of both January meetings.

#### 4. Outstanding Actions

**20/12\_01:** The Panel were informed that this action could be marked as closed as it would be covered later in the meeting under agenda item 11 (UNC676R Cross-Code Working Report).

#### Final Modification Reports

#### 5. IGT132 – Introduction of IGT Code Credit Rules

RCI noted that after the December 2021 Panel meeting, IGT132 had been sent for a 25WD Consultation Period, which closed on 27<sup>th</sup> January 2021, this was following Panel sending this Modification back to the Workgroup for further discussion on consumer impacts as Ofgem had indicated that this section had not been adequately

developed. RCI noted that the Workgroup used a new CACoP initiative which looked to bolster consumer impact considerations within the Modification template. The Panel heard that five consultation responses were received: three responses supported Implementation; one offered qualified support; and one did not support implementation.

Whilst all parties agreed that the Modification should be sent to the Authority for approval as it was a material change, two parties stated that they thought implementation should be scheduled for the next Code release after an Authority decision.

RCI advised that multiple Pipeline Operator respondents noted there would be additional administration work needed to facilitate the new processes brought in by this change, however, these parties felt that the additional impacts would be outweighed by the benefits of implementing the solution. It was noted that another respondent highlighted that the solution could benefit from there being a bilateral agreement outlined to facilitate code credit. CH suggested that this comment may contradict previous ones, to which RCI stated that it was not clear if bilateral agreement measure had been outlined previously in the process and welcomed any further comments.

RCI advised that, due to the level of detail written in the consultation responses, they had been broken down into sections in the summary. RCI noted that a couple of new issues had arisen within consultation that were not raised during previous workgroup discussions.

RCI highlighted one comment which suggested that it had not been clearly stated in the legal text how far in advance figures for credit would need to be known between parties.

There had also been a new comment regarding Multiple Entity Shippers/Short Codes. One respondent raised a concern on the solution of the Modification, noting "It is not clear if the approach would allow for Shippers with multiple entities / short codes to complete a multiple Shipper agreement. For those Shippers with complex portfolios, we are concerned that it will cause unnecessary complexity in administration (setting up and renewing) when the process is compared to the UNC."

It was highlighted that the proposer had not written into the legal text a period of time between an IGT requesting a Shipper having cover and that cover starting, but there was one calendar month written into the text for a change in cover levels subsequent to the initial request being made. CR stated that although Scottish Power had not submitted a response, they would not be in support of implementation. CH queried what impact this would have as no transporter would make an unsolicited demand for credit as there would be a dialogue beforehand. CR enquired what current timescales are for requesting credit cover. CH advised that it would normally be at least 30 days, although noted that this is not currently codified. RCI queried whether the Panel would prefer to send this Modification back to the Workgroup for further discussion or proceed with recommendations to the Authority.

CR stated that the Modification should not be held up further, however, it was a valid point to note in the recommendations to the Authority. The Chair stated that they believed the Modification should be returned to the Workgroup for further consideration. RC agreed, stating that the Modification had already had plenty of discussion, but it would need the appropriate consideration so it should be sent back to the Workgroup and for

the avoidance of doubt then a conversation could be held with the proposer to determine why timelines were not deemed necessary to include in the Modification.

The Panel unanimously agreed that the Modification should be sent back to the Workgroup to consider the new comments raised in Consultation.

#### **6. QPL042 – Removal of Code Credit Rules from QPL Network Code**

The Chair advised that as this Modification was Self-Governance and dependent on the implementation of IGT132, it should be suspended until Ofgem had reached a decision on IGT132. The Panel heard that if IGT132 was rejected by Ofgem, the Code Administrator would hold a discussion with the proposer of the Modification with regards to withdrawing it as the intention of the Modification would be redundant.

The Panel agreed that the Modification should be suspended by a unanimous vote until a decision had been reached by Ofgem on IGT132. The Panel had no further comments.

#### **7. IPL042 – Removal of Code Credit Rules from IPL Network Code**

The Chair advised that as this Modification was Self-Governance and dependent on the implementation of IGT132, it should be suspended until Ofgem had reached a decision on IGT132. The Panel heard that if IGT132 was rejected by Ofgem, the Code Administrator would hold a discussion with the proposer of the Modification with regards to withdrawing it as the intention of the Modification would be redundant.

The Panel agreed that the Modification should be suspended by a unanimous vote until a decision had been reached by Ofgem on IGT132. The Panel had no further comments.

#### **8. IGT150F – Removal of Reference to AIGT within the IGT UNC**

RCI presented the Final Modification Report for IGT150F to the Panel, noting that this change had been progressed as a Fast-Track Modification that had been raised in January 2021 by Brookfield to remove the references to the AIGT (Association of IGTs) within the IGT UNC, as that association no longer existed. It was noted that the Proposer had stated that the Modification met Relevant Objective F (Promotion of efficiency in the implementation and administration of the Code) and there would be no impact on the Significant Code Review (SCR).

The Panel heard that this Modification had been sent for Consultation, which closed on 19<sup>th</sup> February 2021, with one response received. RCI noted that the consultation response was in favour of implementation and that the respondent was happy with the legal text, governance and Relevant Objectives set out by the proposer. RCI advised that, as this was a Fast-Track Modification, implementation would be expected to be in the next scheduled release.

The vote was carried out with One Pipeline User and three Pipeline Operators (please note that this meeting was held as a Reconvened meeting, as per Part L6.10 of the IGT UNC where current quoracy rules do not apply). The Panel agreed that the Modification should be implemented by a unanimous vote. The Panel agreed that subject to the 15-day appeal window, IGT150F should be included in the scheduled June 2021 release.

## **Update on Workgroups**

### **9. Workgroup Summary**

There were no additional comments or questions from the Panel.

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

## **Operational Issues**

### **10. 2022 Meeting Dates**

RCI informed the Panel that the dates for IGT UNC Panel and Workstream meetings in 2022 had been projected and, as per L6.12 of the IGT UNC, RCI noted that Panel were asked to ratify these dates as per the Code. RCI advised that, following the January 2021 Panel meeting, the Code Administrator had revised the dates, taking into account paper cycles which would be affected by UK Bank Holidays, in order to preserve outputs from Workgroup meetings.

The Panel agreed with the proposed Meeting Dates for 2022. There were no further comments, therefore this item was closed. The Chair noted that these dates would be added to the IGT UNC website in due course.

### **11. UNC676R Cross-Code Working Report**

The Chair highlighted that the Proposer of UNC676R had withdrawn the review group, therefore the report could no longer be submitted to the proposer of that review group. It was noted that, when the proposer had withdrawn the review group, they felt the review group was not necessary, due to the UNC Chair writing a report about the ongoings of the UNC (Modification UNC731S). The Chair advised that the report had been amended taking on board all suggestions from the previous IGT UNC Panel Meeting.

RCI noted the main amendments that had been made to the report. The Panel heard that a section had been added detailing the output of the RG004 review group, a paragraph had been added on digitisation and the need for legal text had been addressed under the section 'Identified areas for improvement in Cross-Code working'. RCI also noted that the section previously named 'Conclusions' had been renamed to 'Recommendations'.

The Chair asked the Panel for their input regarding next steps and how they thought the report should be delivered to the UNC in the absence of the review group. CR stated that the report should still be fed back to the UNC, as Cross-Code engagement was still low. RC and CH agreed but stated that they were unsure of how to provide this feedback to the UNC. The Chair suggested passing the report to the UNC Panel and UNCC Independent Chair to include as part of the annual report that was being carried out. The Panel agreed with this approach.

RC enquired as to whether the recommendations section would need to be amended in light of the removal of UNC676R and asked for thoughts on what else could be recommended to improve Cross-Code working. The Chair stated that digitisation was still a pertinent topic. CR suggested adding in a checklist of items to follow.

The Chair asked the Panel if they would like to discuss the report again at the next Panel meeting, or if they were happy for the report to be sent to parties offline, stating that the points made would be added into the report. RC suggested that the approach of sending the report to parties offline was pragmatic. The Chair stated that the report would be sent out in the next couple of weeks and once comments had been received, the report would be sent to the UNC Panel Independent Chair prior to the next Panel meeting.

**ACTION:21/02-01 – CA to amend the UNC676R Cross-Code Working Report and send to the UNC Panel Independent Chair prior to the next UNC Panel meeting.**

## 12. Modification Proposal Template - Review

RCI highlighted that the new Modification Proposal template was created in order to incorporate the new CACoP initiative on consumer impacts and noted that the new template had been tested within the Workgroup discussions for IGT132. The feedback that had been received was sent to CACoP, who are to review the consumer impacts section after six months to consider whether this was working in the desired way. RCI noted that, whilst these forms were a template, they were not code documents and various code administrators had changed them to compliment their own change processes. The Panel heard that as well as putting in CACoP changes, RCI had made additional changes to better facilitate some of the issues that had been experienced on Cross-Code working.

RCI described each change to the Modification template that had been provided in the pre-meeting papers to the Panel and indicated guidance on how to fill out the form correctly. CR enquired about the Cross-Code impacts section, and where parties would note other information. RCI highlighted that this information would need to be noted in the 'free text' section below the tick box.

RF stated that it would be beneficial to provide the feedback from the meeting to the CACoP forum. RCI agreed and noted that this is something that would be taken to the CACoP Chair.

There were no further comments. RCI agreed to upload the new template to the IGT UNC website.

## 13. Authority Updates

No further update was provided.

## 14. AOB

### Code Release

RCI informed the Panel that the February 2021 Code Release had been implemented, including the new CSEP NExA table 2021, as there had been no comments received on the pre-release.

### Password Protocol

RCI stated that, as per the Password Protocols Ancillary Document, Pipeline Users were asked to change their password three times per year (alongside industry releases) and Pipeline Operators should have new passwords by 1<sup>st</sup> March 2021. CH enquired as to whether Shippers would have to change their passwords if they were sending regular updates. RCI advised that if IGTs were receiving regular password changes from the Shipper there would be no further action needed at this time.

There were no further items of business.

**The next IGT UNC Panel is scheduled for 26<sup>th</sup> March 2021.**

#### Appendix 1 – Actions Table

Reference	Date	Action	Owner	Status
21/02 - 01	26/02/2021	CA to amend the UNC676R Cross-Code Working Report and send to the UNC Panel Independent Chair prior to the next UNC Panel meeting.	CA	NEW
20/12-01	18/12/2020	CA to look at the recommendations of the RG004 (Review of IGT Governance and administration arrangements) Workgroup Report, as well as the discussed elements of Digitisation and add these into the draft UNC676R report. The draft report will be brought back to the February 2021 Panel meeting.	CA	Closed