



IGT UNC 21-06 Modification Workstream Meeting

Draft Minutes

10th June 2021 via Teleconference

Attendee	Initial	Organisation	Role
Anne Jackson	AJ	Gemserv	Chair
Heather Ward	HW	Energy Assets	
Jenny Rawlinson	JR	BUUK	
Claire Roberts	CR	Scottish Power	
Cher Harris	CH	Indigo Pipelines	
Jaimee LeResche	JL	Xoserve	
Mark Jones	MJ	SSE	
Eugene Asante	EA	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 apologies had been received from Brandon Rodrigues at ESPUG.

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.

3. Approval of the Previous Minutes

21-05

The Workgroup heard that no comments had been received on the minutes prior to the meeting. The Workgroup had no further comments on the previous minutes, they were approved as a true and accurate record of the meeting, and the Chair closed the agenda item.

4. Outstanding Actions

ALB informed the Workgroup that two actions had been recorded in the previous meeting:

WS 21-05/01: ALB stated that this action could be marked as closed as the Ofgem contact details had been shared with the proposer of IGT154.

WS 21-05/02: CH highlighted that they were still experiencing problems with the encryption/late invoice payment issue by Shippers, however it was noted that no other parties were experiencing the problem. CH agreed that this action could be closed.

Modification Workgroups

5. [IGT145 – Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4](#)

MJ informed the workgroup that the UNC equivalent of IGT145, UNC0664V (Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4) had been raised three years ago and provided a brief history of the modification and the need it seeks to address. MJ indicated that there are some big financial benefits to having a site in class 2 or 3 rather than class 4 and it had been observed that parties have been placing sites in these classes but then were not meeting the requirements in terms of meter readings. If this was observed parties are asked to move the site to class 4 where the meter reading obligations are reduced. The modification has since been developed so that the Central Data Services Provider (CDSP) monitored sites' performance over three months and if there is no action taken, then Xoserve would take action on their behalf and then charge for the service. MJ highlighted that UNC0664V would need developing for a couple more months as it would need another variation.

MJ stated that the Modification had been amended to make it a combined shipper and supplier target in each case. Xoserve had said that because of supplier initiated Faster Switching, it would not be possible to have a lock-out period, so this requirement had been taken out of the Modification. MJ also noted that the variation request for UNC0664V would be sent to the UNC Panel and would include that the proposal that the modification be revised to Self-Governance rather than Authority Decision. It was highlighted that the legal text in the IGT145 directed to the UNC and whilst this would not need changing, the Modification would need further work so would be brought back to the July Workstream meeting.

The Chair noted that the Modification had stated that it would change parts of the IGT UNC, however they did not think this would still be applicable so the Code Administrator would review the legal drafting in this context.

JR asked what the impact would be to IGTs and IGT sites. MJ stated that there would not be a great impact other than the classes would change and there would be no impact on IGTs. The Chair highlighted that there may be more meter readings for those sites and the Modification would likely lead to better meter reading performance from Shippers. JR enquired as to whether there would be less must-reads and if, ultimately, there would be better data for the Annual Quantity (AQ) review process. MJ agreed with this statement.

MJ stated that, when they had looked at the legal text, IGT145 pointed to the UNC at a clause level and the UNC Clauses would be changing therefore they would redraft the IGT UNC Modification prior to the next Workstream meeting on 8th July 2021.

6. [IGT154 – Introducing the concept of a derogation into the IGT UNC for Net Zero innovation project](#)

HW advised that the majority of the changes that had been made to IGT154 were in order to be consistent with UNC0760, which has changed substantially. HW noted that UNC0760 had been published the day before the Workstream meeting and had been discussed at the UNC Governance Workstream the previous week.

It was noted that the biggest change was structural following feedback from Shippers that there should be derogations for things other than Net Zero derogations. HW stated that IGT154 would introduce the concepts of other innovation projects.

HW stated that in the Business Rules section of the Modification, they had retained the automatic implementation for a derogation from the UNC into the IGT UNC. HW stated that the reasoning for this was that the derogation would only affect an IGT if it included a meter point on an IGT network. HW added that the Modification would require a unanimous vote from the UNC Panel to approve a derogation. JR highlighted that at the Governance Workstream there had been a discussion on criteria being robust so that there would be less ability for a derogation to be approved if it didn't meet the criteria.

HW highlighted that Part Two of the Modification aimed to make a framework in the IGT UNC. In Business Rule Four, it was noted that in the UNC a 5-day period was proposed between the derogation being submitted and Panel consideration. HW stated that for IGT154, they were proposing that the window be eight working days, but for a decision at the IGT UNC Panel a derogation could be considered at short notice.

The Chair queried Business Rule 12, asking whether the Code Administrator would need to verify the applicant's approved derogation request. HW stated that it would not be the Code Administrator's job to police it and they should take it as read.

HW stated that, in Business Rule 16, an approved derogation may be varied by submission of a new derogation request via the IGT UNC Code Administrator, clearly stating that it is intending to supersede the existing derogation. If the new derogation request were to be rejected, the original approved derogation would remain effective. JR asked if the reason for rejection would affect the ability for the first one to be in place and asked what the process would be for if someone had a derogation which fell outside the criteria. HW advised that they would have to consider it further offline, suggesting that it could be a discussion to be held at the UNC Governance Workstream meeting.

HW advised that Business Rule 17 had not been put into the UNC and suggested that the party requesting the derogation should report to the Panel every 6 months with details on the progress of the derogation.

It was noted that Business Rule 18 had been added in following the Governance Workstream as there was a concept that it may be more appropriate to have a derogation until the goal is achieved, not for a set amount of time. HW highlighted that if no progress had been made after a certain amount of time, the Panel would be able to rescind the derogation in those circumstances.

HW advised that, in Business Rule 19, they had added in that the Code Administrator may be able to recover any costs from the party requesting the derogation, however they were still waiting for confirmation from Ofgem for that rule.

The Workgroup heard that at the Governance Workstream, it had been discussed that a change to the Code would give greater transparency to parties and if the change would be material then the Modification could be sent to Ofgem for decision.

HW advised that there may not be any further updates to report on at the next IGT UNC Workstream meeting as the UNC Governance workstream would be the day before that meeting. HW advised that UNC0760 would be due back to the UNC Panel in September 2021. The Chair advised that they intended to add IGT154 as an agenda item for the next IGT UNC Workstream meeting and HW agreed to provide an update on what would be discussed at the Governance Workstream meeting, but they would not have time to update the Modification and Ancillary Document before that meeting.

Standing Items

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

ALB presented the cross-code modification implications tracker and provided the following updates:

UNC0769 - Adding Local Authorities as a new User type to the Data Permissions Matrix – ALB highlighted that a sponsor would be needed for the IGT UNC equivalent Modification. CH agreed to be the sponsor for this Modification.

UNC0746 - Application of Clarificatory change to the AQ amendment process within TPD G2.3 from 1st April 2020 – ALB stated that the UNC Workgroup had determined that there would be no IGT implications. JL advised that the legal text was now available for this Modification. The Chair agreed to check the legal drafting and stated that if the text had not been altered then there would need to be an IGT UNC equivalent Modification raised.

UNC0734S - Reporting Valid Confirmed Theft of Gas into Central Systems – It was noted that the solution was still in the UNC Workgroup for development and there had been no legal text released, therefore the Code Administrator could not assess whether changes would be needed to the Code.

UNC0674 – Performance Assurance Techniques and Controls - The equivalent IGT UNC Modification, IGT138, would be sent to the July 2021 IGT UNC Panel for decision.

UNC0710 - CDSP provision of Class 1 read service - The IGT UNC Panel agreed that the IGT UNC equivalent Modification, IGT148, should be aligned with UNC710 and XRN5218 and therefore a further notice of implementation would be issued once an implementation date had been confirmed for the whole suite of changes. This would provisionally be no earlier than 1st September 2021, resulting in an extraordinary release for the IGT UNC.

The Workgroup acknowledged the update and had no further comments.

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

ALB advised that there had been one new addition to the Known Issues Register prior to the meeting. This was a housekeeping update following an issue raised during the last meeting in relation to the request for an AQ Review and NExA table update. HW had advised that the associated ancillary document referred to 'Pipeline Operation Agency', which is a defined term in the IGT UNC and this referred to section N1.1. However, what was defined in section N1.1 was the 'CDSP', so the reference was not accurate.

9. AOB

New Ofgem Representative

The Chair informed the Workgroup that there would be a new Ofgem representative attending the IGT UNC Panel meetings called John Phillips. Any business involving the IGT UNC that Ofgem should be made aware of should be directed to john.phillips@ofgem.gov.uk in future.

IGT156 – Retail Code Consolidation SCR

The Chair noted that the RG005 review group had looked into the work that would be needed following the Faster Switching and Retail Code Consolidation SCRs. Ofgem would be implementing the Retail Consolidation Code SCR in September 2021, as they had raised Modifications with all Codes. The Chair noted that the IGT UNC equivalent (IGT156) had been discussed at the IGT UNC Panel meeting in May 2021 and was currently out for consultation, closing on 15th June 2021. It was highlighted that Ofgem had requested a 10 Working Day consultation period and had published the legal text as they felt they had already consulted on the Modification with industry through other means. The Chair advised that the intention was that all the Retail Code Consolidation SCR Modifications would be discussed at their relevant Panel meetings by the end of June 2021, noting that the IGT UNC Panel would offer their views on the Modification and it would then go to Ofgem for decision.



The Chair advised that Workgroup members with any input should provide feedback through the consultation process.

RGMA Guidance Document

The Chair stated that the IGT UNC Panel had discussed the RGMA Guidance Document at their last meeting and it was concluded that the document sat outside of IGT UNC Code Governance. It was noted that the IGTs would be raising it as a discussion point at the next INA meeting where it would be discussed whether it was still applicable. The Chair noted that they were anticipating feedback from that meeting on how they wish to proceed. HW added that they had requested that it be added to the agenda for the next Regulatory Subcommittee on 28th June 2021.

Deed of Undertaking

CR stated that the issue of the Deed of Undertaking from Xoserve had been raised at the last Panel meeting and asked if there had been any further discussion on this matter. CH advised that they accepted that they had made a mistake on timescales and it had been sent to everyone because it was agreed that not all suppliers were signed with all IGTs. It was noted that in order to manage it going forward, everyone would need to be signed up to the same terms, so the deadline had been extended. CR asked whether this would supersede the agreements that were held with individual IGTs. CH agreed stating that it would replace anything that had been held previously.

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, 8th July 2021.

Annex A – Action Log

Action reference	Action Description	Owner	Status
WS 21-05/01	CA to share Ofgem contact details with the proposer of IGT154.	CA	Closed
WS 21-05/02	All parties to investigate whether they have experience of the encryption / late invoice payment issue by Shippers in recent months.	All	Closed