

Joint DN response to the paper presented by IGT Code Administrator at UNC modification panel 20th May 2021.

History

IGTs originally had their own network codes that were a much simplified version of the then Transco Network Code, they then developed an IGT UNC and then, when the Project Nexus changes went live on 1st June 2017, aligned themselves much more closely to the UNC, due partly to influence from Shippers for more consistent arrangements.

Relationships and Responsibilities

The IGT UNC therefore exists separately from the UNC with separate code administrative services. DNs and NTS are not parties to the IGT UNC and cannot raise changes to it

Direction of travel

From the above, the direction of travel for the IGT UNC has been to bind it more and more closely to the UNC.

Identified areas for improvement in cross code working from IGT UNC workgroup

- 1) **Earlier flagging of potential impacts to IGT UNC**
Discussions sometimes take place in UNC workgroups that indicate that a party is thinking of raising a modification. The party may present a pre-modification to the workgroup before a modification is raised. Attendance at these workgroup meetings gives parties an opportunity for the earliest indications that a modification is being raised and hence the earliest opportunity to think about impacts on themselves or the IGT UNC or another Code. The issue faced by IGTs mirrors to some extent the issue faced by many UNC parties who may not routinely attend workgroup meetings and then later find a modification has been raised in which they have an interest. If individual IGTs cannot attend then they may be able to co-operate to fund someone to attend and report back; the most relevant meeting is likely to be distribution workgroup held on the 4th Thursday of each month. We also note the IGTAD Committee serves a useful purpose in highlighting relevant cross-code modifications and changes to other documents.
- 2) **GTs not taking up the non-voting seat at IGT UNC modification panel**
DNs are willing to provide a representative to attend this for a few months and then review the effectiveness of their attendance.
- 3) **Legal text should be provided earlier to IGT UNC Code Administrator**
Legal text is produced in accordance with the timelines outlined within the UNC and is driven by when the solution of a UNC modification is stable, it cannot be provided to the IGT Code administrator earlier than it is published to the industry. The UNC Modification Panel agreed changes to the Legal Text Guidance document at the meeting on 15th July 2021.
- 4) **Implementation dates fall outside IGT UNC release window**
There is clearly a balance to strike between implementing changes as early as possible and having coordinated windows. The table below shows examples of

where the Joint Office has discussed coordination of implementation dates with other Code Administrators.

UNC Modification Number	FMR Approval Panel Date	Time	Date	IGT Impact	SPAA Impact	Equivalent IGT UNC Modification Number
0602A	16/02/2017	05:00hrs	20/02/2017	Yes		IGT092 / 092A
0565A	15/12/2016	05:00hrs	01/06/2017	Yes		IGT039
0604S	20/04/2017	05:00hrs	Project Nexus	Yes		IGT086
0593V	21/09/2017	05:00hrs	15/12/2017	Yes		IGT095
0641S	17/05/2018	05:00hrs	11/06/2018	Yes		IGT103
0649S	18/10/2018	05:00hrs	09/11/2018	Yes		IGT115
0654S	20/09/2018	05:00hrs	01/03/2019	Yes		IGT110
0668S	17/01/2019	05:00hrs	01/03/2019	Yes		IGT116
0684S	16/05/2019	05:00hrs	28/06/2019	Yes		IGT122
0695S	17/10/2019	05:00hrs	08/11/2019	Yes	Yes	IGT129 & SCP476
0681S	18/07/2019	05:00hrs	25/03/2020	Yes		IGT127 (subsequently withdrawn)
0707S	19/03/2020	05:00hrs	14/04/2020	Yes		IGT136
0713S	16/04/2020	05:00hrs	11/05/2020	Yes		IGT132 (although not directly related noted in FMR)
0704S	21/05/2020	05:00hrs	15/06/2020	Yes	Yes	IGT133 & SPC480
0715S	21/05/2020	05:00hrs	15/06/2020	Yes		IGT139
0702S	21/05/2020	05:00hrs	24/07/2020	Yes		IGT134
0697VS	17/09/2020	05:00hrs	18/11/2020	Yes		IGT134, 135 & 139
0750FT	17/12/2020	05:00hrs	13/01/2021	Yes		IGT143U
RevFNI0692S	19/12/2019	05:00hrs	05/11/2021*	Yes		IGT131

5) **More official cross code working groups are required**

This can be done when required but requires a modification to be raised in both codes at the same time (see below). Examples of UNC IGT/ UNC collaborative working groups are shown in the table below.

Modifications		Subject	Approach	Date
UNC	IGT			
UNC0440	IGT039	Project Nexus – iGT Single Service Provision	Attendance by IGT and IGTUNC Code Administrator representatives at UNC Workgroup, no joint meetings.	2012 - 2014
UNC0565	IGT086	Central Data Service Provider: General framework and obligations	Attendance by IGT Mod Proposer who updated IGT Mod based on discussion at UNC Workgroup, no joint meetings.	2016 - 2017
UNC0593	IGT095	Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries	A number of joint Workgroup meetings hosted by Joint Office and Gemserv.	2016 - 2017
UNC0647	IGT119	Opening Class 1 reads to Competition	A number of joint Workgroup meetings hosted by Joint Office.	2018 - 2019
UNC0649	IGT115	Update to UNC to formalise the Data Permissions Matrix	Attendance by IGTUNC Code Administrator representatives at UNC Workgroup and Joint Office at IGT UNC Workstream.	2018
UNC0710S	IGT148	CDSP provision of Class 1 read service	Attendance by IGT representatives at UNC Workgroup, no joint meetings.	2019 - 2020

6) **More proactivity rather than reactivity**

As noted, some proposers do engage with the IGT UNC code administrator, Shippers can raise IGT UNC modifications but cannot be required to do so. NTS and DN operators cannot raise IGT UNC modifications and have to rely on an IGT to decide whether to raise an equivalent modification or to make no change as there may be a choice to make as to what the IGTs want to do, for example UNC 0710 CDSP provision of Class 1 read service where IGTs could raise a mirror modification or chose to provide the service themselves The JO, as critical friend, can suggest to proposers to consider the IGT impacts and engagement with IGT UNC code administrator but cannot mandate it.

7) **Ability for proposal forms / templates to show explicit early indicators of Cross-Code impacts**

Proposers can be encouraged to be clear regarding the impacts but the impacts are sometimes unknown until the modification solution has been more fully developed.

8) **Digitalisation**

Suggestion that this would make the codes more accessible, mitigate the need to amalgamate the UNC and IGT UNC, ease resource issues facing industry and possibly increase engagement. Making the codes easier to access and navigate is clearly desirable and may make access easier however this will not happen immediately and would not address the issue of IGTs being aware of thoughts parties may have about raising modifications that may be hinted at in workgroups before the modification even comes as a pre-modification discussion

Way Forward

It seems likely that further change will occur and the transporter UNC parties are happy to discuss with IGTs the future path of IGT UNC and UNC relationships.

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