

IGT UNC Modification Panel Meeting

Final Minutes

Friday 23rd July 2021

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Jenny Rawlinson	JR	BUUK	Pipeline Operators	
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Heather Ward	HW	Energy Assets Pipelines	Pipeline Operators	
Claire Roberts	CR	ScottishPower	Pipeline User	
Chris Barker	CB	BUUK	Observer	Proposer IGT132V
Richard Pomroy	RP	Wales and West Utilities	Observer	Distribution Network (DN) Representative
Scott McPhillimy	SM	Ofgem	Authority	
Cameron Bailey	CBa	Ofgem	Authority	For IGT132V discussion
Eugene Asante	EA	Gemserv	Code Administrator	
Amie Lauper-Bull	ALB	Gemserv	Code Administrator	Secretariat

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).

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. JR noted that they had one item of AOB to raise regarding a new UNC Modification.

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

3. Approval of the previous minutes (21-06 and 21-06 Reconvened)

The Chair informed the Panel that JR's Panel membership would be ceasing after August 2021 and that CH's tenure ceased after May 2021. The Independent Network Association (INA) had confirmed that both JR and CH would continue to be IGT Panel Representatives for a further two years, CH's tenure starting at this meeting (July) and JR's tenure starting in September 2021.

The Chair highlighted that at the last Panel meeting (June) CH had been accepted to be a Panel member and as such had been involved in the decision making, however their tenure had lapsed. The Chair noted that, in the June 2021 meeting, CH had also been the alternate for HW. The Chair indicated that if CH's vote was removed from all the determinations at the last meeting, there would be no impact on any decisions. The IGT constituency would remain at quoracy requirements and all determinations would remain unanimous. The Chair offered this as a solution for the issue, indicating that the revisions could be made before the Panel accepted the minutes for that

meeting. The Panel agreed with this approach. The Code Administrator took the Panel through the changes that would be made to the minutes to remedy this issue. SM stated that they would flag it internally to Ofgem in relation to the determination for IGT156 (Retail Code Consolidation SCR) which was sent to Ofgem at the June Panel meeting. The Chair apologised for the oversight and confirmed that local work instructions would be updated to ensure more frequent reviews and tenure expiries diarised to prevent the issue occurring again.

The Chair advised that comments had been received on the previous minutes from JR, who indicated that the use of the gender-neutral pronoun 'they' had made the text confusing in places and unclear on who the text was referring to in parts. CH agreed that using gender neutral terms could cause confusion. The Chair advised that the Code Administrator had no wish to cause offense and that it had been raised previously that if someone were to determine gender by voice on teleconference calls, that person could get it wrong and could cause offence. The Chair also reminded the Panel that a modification had recently been passed to remove pronouns from the IGT UNC and that this modification did not give requirements for minutes, but the Code Administrator had been mindful of the intent. SM indicated that Ofgem were adopting a similar approach where a person may be male or female. The Chair invited the Panel to decide on whether to continue to use pronouns or not. CH suggested continuing to remove use of pronouns where possible, but if after a period it was deemed that this was not possible then to revert to gender neutral pronouns. All agreed that the minutes needed to accurately reflect meeting discussion ultimately. The rest of the Panel agreed with this approach.

JR further stated that there had been a couple of sentences in the previous minutes which were written in such a way that it sounded as though they had spoken on behalf of the Panel. JR clarified that any views expressed were their own and ALB agreed to amend the minutes accordingly.

The Chair advised that a correction had been made to remove the sentence stating that IGT157 would be returning to the Panel in the July meeting. It was confirmed the agreement for IGT157 was for Panel to track the modification with the Workgroup as well as the UNC modification and once the UNC modification had been sent back to the UNC Panel, then IGT157 would be returned to the IGT UNC Panel for a decision on how to proceed.

The Panel had no further comments to add and the minutes of both June meetings were approved as a true reflection.

4. Outstanding Actions

ALB informed the Panel that there was one outstanding action:

21/05 – 01 - IGTs to provide feedback following discussions on the RGMA Guidance document from INA Regulatory Subgroup in the July Panel meeting: CH advised that this action had been raised with the Independent Networks Association (INA) and views had been sought. HW advised that CH had been the only person to send details to the INA and the rest of the IGTs would need chasing. HW stated that the RGMA Guidance document would need to be kept somewhere that would be visible to Shippers, therefore it would be likely that it would stay on the IGT UNC website. CH agreed to chase the other IGTs. The Panel agreed this action would remain open until the August Panel meeting.

Authority Decisions

5. IGT132VV – Introduction of IGT Code Credit rules

The Code Administrator appraised the Panel on the recent history of the modification, the issues identified by Ofgem, the expectation and guidance from Ofgem and the options open to Panel in taking the modification forward.

It was noted that Ofgem had sent back the Final Modification Report for IGT132VV, stating that further work was needed before it could proceed. CB advised that they felt a lot of the points raised had been addressed, however as the proposer they would be happy to work with the Code Administrator to amend the Modification further. CB added that for other points specific Shipper analysis would be required, however there had been issues with Shipper engagement on numerous occasions and it may become a barrier to the progression of the Modification. And potentially poses a risk of setting a dangerous precedence should lack of involvement from parties be a contributing factor in change proposals not being approved.

CH agreed, stating that a lot of IGTs did not have Code Credit arrangements in place so Shippers may not want the introduction of Code Credit Rules. CH added that, all the time that it was not in place, IGTs would be left vulnerable and if Shippers did not engage, it could block the Modification from progressing.

JR asked if the methodology for the Modification had been based on credit rules that were already in place with other Codes. CB agreed, stating that DCUSA had been used as a basis, but the UNC rules had also been taken into account and changes had been made to make Shipper parties more comfortable. CB added that both DCUSA and UNC credit arrangements had been based off the same guidance from Ofgem, so there was not much difference between them. CBa stated that the concern that Ofgem had was more to do with the impacts of the policy and the Modification, and these would need to be made clearer in the FMR. CBa noted that if credit cover was not put into Code, how would it leave IGTs vulnerable and questioned what that it would mean for consumers and competition. CBa added that, on the other hand, there had been concerns around the risk and benefits if something was done in this area, so a broader assessment of potential ranges of costs based on sensible assumptions was needed. CBa highlighted that a range of scenarios could be given rather than a single figure. CB stated that a paper from their organisation had been sent to Ofgem which answered the points that had been raised, but it had commercially sensitive data in it which is why it had not been shared with the wider group. CBa advised that everything that had been sent to Ofgem had been considered, and Ofgem had also considered wider implications as it could impact the wider retail market.

JR stated that it is recognised that where shippers incur costs those costs potentially end up with the consumer which, of course, is not ideal. However, where an IGT incurs costs due to a failed shipper, those costs are borne by the IGT. JR added that it was uncertain how to address that issue but proposed that the Modification be sent back to the Workgroup. CBa stated that Ofgem could not assess the different costs, the materiality of the costs and how they would fall on parties as no costs had been presented. CB noted that this related to the lack of engagement from Shippers.

It was noted that, due to lack of engagement, not many consultation responses had been received. JR enquired as to whether Ofgem could contact the one party who had presented an opposing view to the Modification directly and ask them for their costs, in order to move the Modification forwards. CBa noted that although there had not been a lot of engagement from Shippers, this Modification would affect a wider range of Shippers so Shippers may be interested in future.

CH believed that IGTs were at a disadvantage and asked why IGTs were being prevented from asking for Code Credit agreements when these were available to other codes. CBa advised that the objections were not to the Modification, they were in order to ensure that the correct support was in place.

CR suggested that a session be held for Shippers only to discuss the Modification. CB agreed with this approach, stating that mock data could be used to produce scenarios with different outcomes in the Workstream meeting on the assumption that engagement from Shipper parties would be available. CBa requested that Ofgem be included in further discussions so that they could provide more detail and have discussions with the relevant parties.

The Chair asked how the Panel would like to proceed. JR suggested that it would be sensible to send the Modification back to the Workgroup for discussion. JR added that it would be useful for the Workgroup to look at the work CBa had referenced about costs associated with credit rules and from there a plan could be made on how to address Ofgem's concerns. CR agreed with this approach and agreed to reach out to Shippers and advise that they raise their concerns. CBa requested that Ofgem be kept up to date with discussions held in order to mitigate the risk of the Modification being delayed further.

The Chair asked the Panel if they thought that the Modification should return for discussion at the next Workstream meeting. HW agreed with this approach. The Chair asked CR if they required any help whilst canvassing the Shippers. CR requested that the slides shared in the meeting be distributed as soon as possible and agreed to reinforce that Ofgem had stated that Shipper engagement is needed.

CB stated that they would speak to the Code Administrator regarding the intent of sending the Modification back to the Workgroup. The Chair stated that guidance from the Panel to the Workgroup was expected at this stage and the Panel would need to consider what objectives they would want the Workgroup to achieve.

JR stated that the Panel should ask the Workgroup to address specifically what Ofgem had asked them to look at and to address the points raised by Ofgem. JR added that it would be useful for the Workgroup to look at the output from Supplier Analysis that CBa had referenced. CBa stated that Ofgem would be happy to hold a discussion offline and to attend the Workgroup meeting.

The Chair asked the Panel if it would be beneficial for Shippers to send credit specialists to discussions if they had them. JR agreed with this approach, adding that it may be beneficial to highlight to Shippers that there is a potential high concern that in the absence of Shippers in discussions, the decision may be made without their influence. SM suggested stating that the decision could be made on estimated costs. The Chair agreed with this approach, adding that Shippers needed to understand that a decision could be made without them and implemented.

The Chair asked the Panel if a review of discussions held at the Workgroup would be required, or if the Workgroup summary would suffice. JR suggested that it would be useful to receive updates, adding that there was a concern that the Modification would sit with the Workgroup for a long time. HW agreed, suggesting that a timeline of 3 months be created to prioritise the Modification. CB suggested holding one Workgroup to explain the amends requested by Ofgem, one to complete the work and one further Workgroup for analysis. The Panel agreed with this approach.

There were no further comments and the Chair closed this section of the meeting.

Final Modification Report

6. IGT155 - Adding the Retail Energy Code Company as a new User type to the Data Permissions Matrix

The Final Modification Report for IGT155 was presented to the Panel and it was noted that three responses had been received during consultation, all of which supported the Modification. The Panel agreed that the Modification should be subject to Self-Governance procedures and that all impacts had been duly considered. The Panel agreed

that the Modification met the Relevant Objective cited by the Proposer. The Chair highlighted that, as there would be no legal text requirement for this Modification, it could be implemented in the Code under the jurisdiction of the Data Services Committee (DSC) once agreed by the Panel as the UNC equivalent Modification had already been implemented. The Panel agreed with this approach and the Chair stated that the Modification would be implemented on 16th August 2021.

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 unanimously agreed that IGT155 should be implemented.

Modification Implementation Dates

7. IGT148 - Provision of Class 1 meter read service on IGT networks by the CDSP

The Chair informed the Panel that the Code Administrator had received notification that the UNC equivalent Modification to IGT148 would be implemented on 1st April 2023. RP stated that Shippers had expressed a preference for the Modification to be implemented in Summer. As the proposer RP had been looking to novate the current service provider agreements from Distribution Networks to Xoserve, but for various reasons it was not possible. It was noted that implementing in the Summer of 2022 provided a benefit of a few additional months and Xoserve had indicated that this could compromise the procurement event for the new service provider. RP stated that, given that the priority would be to have a fully functional service, the decision had been taken that the best approach would be to carry on with the current service and the Modification would be implemented in 2023 alongside a new service provider contract.

The Chair asked the Panel if they wished to move the implementation date of IGT148 to 2023 to align with the UNC Modification. JR thought that the implementation should be aligned. The Panel unanimously agreed on this approach.

The Chair informed the Panel that a revised Notice of Implementation would be published on the IGT UNC website and confirmed that both Modifications would be implemented together.

Operational Issues

8. CSEP NExA Tables

The Chair informed the Panel that the proposed CSEP NExA Table was presented at the July Workstream meeting and that the workgroup were informed the data submission excluded data from one IGT which, the INA had informed, was difficult to obtain but based upon the connection numbers in the INA's latest plot data submission to Ofgem, the INA do not believe that constitutes a serious omission. It had been agreed that, as the IGT was small, it would not affect the process significantly.

The Panel heard that no significant comments had been raised by the Workgroup. HW advised that the IGT who had not participated was now aware of the process and would participate next year.

CR stated that a comment had been raised by a colleague that the CSEP NExA Table was not easy to find on the IGT UNC website. The Chair assured the Panel that this issue was being addressed.

The Panel unanimously agreed that the proposed CSEP NExA Tables should be implemented into the IGT UNC in the February 2022 Code 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](#).

Authority Updates

SM advised that Ofgem and The Department of Business, Energy and Industrial Strategy (BEIS) had published a consultation on the Design and Delivery of the Energy Code Reform on 20th July 2021. The consultation proposed two options, the preferred option was for Ofgem to become the Strategic Body. The alternative would be to create an Integrated Rule Making Body (IMRB) within the Future System Operator (FSO) to include strategic and code manager functions (but some things would still be directed to Ofgem). SM advised that the consultation was still open and Ofgem were inviting views by 28th September 2021. SM added that there would be a workshop for stakeholders on 5th August 2021 and, subject to the outcome of the consultation, BEIS would be looking to bring in legislation.

SM further added that a new Ofgem Representative had been appointed to the IGT UNC. The Panel heard that Jennifer Semple would be taking over in September 2021 and would also attend the August Panel meeting as an Observer. SM noted that comments had been received previously stating that it would be useful for the IGT UNC Ofgem representative to be the same as the UNC. SM advised that the aim is that Jennifer Semple would also be overseeing UNC matters.

AOB

Cross-Code Working Report

RP advised that the IGT UNC cross-code working report had been received by the UNC Panel in May 2021 and a response had been sent to the IGT UNC Panel and would be on the IGT UNC Panel agenda for August 2021. It was noted that, as part of this, Distribution networks had agreed that they should send a representative to the IGT UNC Panel meetings to take the observer seat and review its effectiveness over the coming months. The Chair noted that the report would be published as a Panel paper prior to the August 2021 meeting. The Panel thanked RP for taking the Distribution Network Observer seat.

UNC0773 – Introduction of a Micro Business identifier in Central Systems

JR highlighted that it had been mentioned that a new change had been drafted under the UNC with regards to a Micro Business Identifier. JR informed the Panel that this change had been withdrawn and therefore an IGT UNC equivalent Modification was not required.

UNC0734S - Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers

JR advised that UNC0734S had been finalised at the last UNC Distribution Workstream. JR added that there would need to be an IGT UNC equivalent modification, but the IGT UNC parties had been waiting for the UNC Modification to stabilise. The Chair asked if there was a sponsor ready to pick up the Modification. JR advised that Steve Mulinganie was the Proposer for UNC0734S and the Chair agreed to have a conversation to enquire as to whether the Proposer of UNC0734S would also sponsor the IGT UNC equivalent Modification. The Chair also agreed to add this as an item of discussion to the Workstream Agenda.

Other

The Chair informed Panel that ALB would be moving on within Gemserv and would therefore no longer be working for the IGT UNC. The Panel thanked ALB for their participation in IGT UNC meetings.

There were no further items of AOB raised or comments from the Panel and the meeting was closed.

The next IGT UNC Panel is scheduled for 27th August 2021.

Annex 1 – Actions Table

Reference	Date	Action	Owner	Status
21/05 - 01	28/05/2021	IGTs to provide feedback following discussions on the RGMA Guidance document from INA Regulatory Subgroup in the July Panel meeting.	CH	Further update August Panel