

IGT UNC Modification Panel Meeting

Draft Minutes

Friday 27th August 2021

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Rachel Clarke	RC	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	Scottish Power	Pipeline User	
Richard Pomroy	RP	Wales and West Utilities	Observer	Distribution Network (DN) Representative
Jennifer Semple	JS	Ofgem	Authority	
Eugene Asante	EA	Gemserv	Code Administrator	
Sandra Fawzy	SF	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). Apologies were received from Anne Jackson (Gemserv), Michelle King (Energy Asset Pipelines) and Scott McPhillimy (Ofgem). The Chair welcomed both JS and SF respectively to their first IGT UNC Panel meeting.

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. The Chair noted that they had one item of AOB regarding the 'Joint Distribution Network Response' to be presented by RP.

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

3. Approval of the previous minutes (21-07 and 21-07 Reconvened)

EA presented the Panel with suggested amendments received prior to the meeting on the previous minutes (21-07 Reconvened) which were all approved by the Panel. The Panel had no further comments to add and the minutes were approved as a true and accurate account of the meeting.

4. Outstanding Actions

EA 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 item had been discussed at the last INA Regulatory Subgroup meeting and that there had been no feedback yet from other IGTs on this. HW noted that a

response had been received from ESP Pipelines. It was agreed that the action deadline would be extended until the 24th September 2021 when the next Panel meeting is scheduled.

Workgroup Report

5. IGT157 – Adding Local Authorities as a new User Type to the Data Permissions Matrix

The Chair appraised the Panel on the recent history of the Modification. RC took the Panel through the Workgroup Report and clarified with the Panel that it was not the Final Modification Report as previously stated on the agenda. Areas highlighted by the Chair to the Panel were; there were no legal text requirements for this Modification following the implementation of IGT135 (Alignment of the IGT UNC Part K and the Data Permissions Matrix). The Modification has no direct impact on competition and it has the potential of having positive impacts on the consumer. The Workgroup believe that the specific use cases that will be requested by LAs will be in support of the LAs Net Zero targets and any scrutiny of energy efficiency and carbon consumption is likely to lead to a reduction in usage. The Workgroup felt that there would lead to lower consumer bills thereby having a positive impact. There were no further questions from the Panel.

The Workgroup's recommendation is that it should proceed to a 15-day consultation period as per the Self-Governance rules. The Chair informed the Panel that due to the August bank holiday a 15-day consultation period could not be achieved for the Panel to receive the Final Modification Report at its September meeting. It was agreed that the consultation period should be reduced to 14 days rather than 15 in order for the Report to be sent out one week commencing 20th September at short notice and the final Report to be ready for the Panel meeting scheduled on 24th September. The Panel agreed that following this timetable and receiving a short notice paper for the September Panel was the most pragmatic approach.

Update on Workgroups

6. Workgroup Summary

There were no workgroup summary comments by the Panel.

Authority Updates

7. Authority Update

JS informed the Panel that there were no updates or any questions from the Panel to submit to Ofgem.

AOB

8. Joint DN Response

RP took the Panel through each of the Joint DN Response:

Earlier flagging of potential impacts to IGT UNC

RP noted that discussions sometimes take place in UNC workgroups that indicate that a party is thinking of raising a modification; RP suggested attendance from IGT parties or an IGT representative at these workgroup meetings gives parties an opportunity to think about impacts on themselves or the IGT UNC or another Code. It is not usually until a modification is raised that implementation matters are raised. CH questioned whether the Joint Office as Code Administrator for the UNC are prompting parties to consider cross code implications at this stage or whether

this is left to when a Modification is formally raised. RP explained that the Joint Office are only involved at the critical friend stage and these observations do not have to be adhered to by the proposer.

JR acknowledged that the Joint Office work within their parameters as a Code Administrator, however suggested whether there could be more done to encourage cross-code implication considerations earlier on in the process. JR noted that the lack of representations from Shippers has a negative impact on cross-code considerations as they are the conduit between the code. RC noted that there may also be a need to a cultural shift from parties into considering the IGT UNC more directly than other codes as the relationship between the UNC and IGT UNC is much closer than any other. The Panel discussed how earlier indications would help parties to be proactive instead of reactive.

The Panel discussed having a checklist of general areas which may be impacted in the IGT UNC from a UNC change. RP propounded that it may make it easier for the proposer to spot cross implications which a more direct list of areas to consider. RP mentioned that not all cross implications are foreseeable, and that Nexus is a good example of that.

It was agreed that RP would discuss these options with other DN representatives and the Joint Office.

ACTION:21/08-01 – RP to discuss with DNs and the Joint Office adding in additional Impact assessments for the IGT UNC into Modification Proposal Forms.

GTs not taking up the non-voting seat at IGT UNC modification panel

RP noted that DNs are willing to provide a representative to the Modification Panel meetings and to review the effectiveness of their attendance within a few months.

Legal text should be provided earlier to IGT UNC Code Administrator

Legal text cannot be provided to the IGT Code administrator earlier than it is published to the industry. RC queried whether this was a codified requirement. RP noted that it was not. JR highlighted that the point here would be to work closer with the Code Administrator. RP stated there is often time constraints and financial impact as legal text needs to be done following a Modifications solution being finalised. RP noted that usual practice is to send legal text to the proposer prior to issuing to industry and that there can be challenging timescales around this.

RC stated that at the IGT UNC Workstream meeting a cross code tracker is produced and reviewed by the Workgroup which includes an analysis on legal text implications, however, this is usually done via searching the Joint office website and looking at any available updates, not with early sight of changes. RC acknowledged the challenging timescales around legal text production however, highlighted that there are several instances where unintended consequences of impacts on the IGT UNC have been found and could have been easily avoided if legal text drafting was available to the Code Administrator earlier in the process. RP acknowledged this and noted that feedback would be provided back to the other DN representatives on this.

RC noted that there had been some IGT UNC Panel suggestions incorporated into the 'Legal Text Guidance document' at its annual review and it is hoped that will go some way to mitigating this.

Implementation dates fall outside IGT UNC release window

JR suggested that it would be good to have a compromise between IGT UNC and UNC on implementation dates for Modifications with joint impacts and respective Modifications. RP noted that following steer from Xoserve and the industry all system changes will now fall into the traditional three scheduled releases per year. RP acknowledged that there is a balance between pragmatism and process and that there are strong arguments on both sides. JR noted that in recent years this issue has improved and that it was important to keep both Codes in mind when considering the approach to implementation and to be cognisant of how each other works. RP resolved to take these comments back to the DN representatives.

More official cross code working groups are required

RP noted that there had been several recent examples of joint working groups, both where the Joint Office and Gemserv had held meetings. Panel members all acknowledged that Joint Workgroup for certain Modifications would promote efficiency for the industry. HW suggested that for some Modifications this may not work however, joint working groups could be including into other already established meetings. RP stated that this may work although there may be availability issues noting that the Joint Office were keen not to have a lot of separate meetings.

JR noted that Joint working groups would also help with the issues around legal text that the Code is currently experiencing as this would be shared between the administrators as part of this process. RC queried whether it was the decision of the proposer or the Administrator as to whether a joint working group should proceed. RP noted that this distinction wasn't apparent. RP resolved to take an action to speak to the Joint Office and other DN representatives on the possibility of more joint working groups.

ACTION:21/08-02 – RP to discuss with DNs and the Joint Office about the process of creating/hosting joint working groups.

More proactivity rather than reactivity

This was already covered in the discussion around Earlier flagging of potential impacts to IGT UNC.

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

This was already covered in the discussion around Earlier flagging of potential impacts to IGT UNC.

Digitalisation

RP noted that DNs would not be opposed to a digitised solution however, suggested that it may be prudent to monitor how the Retail Energy Code Portal operates as to whether this would benefit the gas industry. RC stated that digitisation could help with picking up cross code implications or unintended consequences of a change earlier on. It was agreed by the Panel that this would be a long-term solution and that there are potentially faster solutions to alleviate strains felt today.

The next IGT UNC Panel is scheduled for 24th September 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	Carried Forward – September 2021 update
21/08 - 01	27/08/2021	RP to discuss with DNs and the Joint Office adding in additional Impact assessments for the IGT UNC into Modification Proposal Forms	RP	New
21/08 - 02	27/08/2021	RP to discuss with DNs and the Joint Office about the process of creating/hosting joint working groups.	RP	New