



## **IGT UNC 21-07 Modification Workstream Meeting**

### **Final Minutes**

**8<sup>th</sup> July 2021 via Teleconference**

<b>Attendee</b>	<b>Initial</b>	<b>Organisation</b>	<b>Notes</b>
Anne Jackson	AJ	Gemserv	Chair
Heather Ward	HW	Energy Assets	
Jenny Rawlinson	JR	BUUK	
Helen Bevan	HB	Scottish Power	
Cher Harris	CH	Indigo Pipelines	
Jaimee LeResche	JL	Xoserve	
Mark Jones	MJ	SSE	Until Agenda item 5
Clare Manning	CM	E.ON	
Kundai Matiringe	KM	BUUK	
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 Claire Roberts from ScottishPower.

#### **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**

##### **21-06**

The Workgroup heard that no comments had been received on the minutes prior to the meeting. The Workgroup had no comments to add to the previous minutes and they were approved as a true and accurate record of the meeting.

#### 4. Outstanding Actions

ALB informed the Workgroup that no actions had been recorded in the previous meeting and there were currently no other open actions.

#### Modification Workgroups

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

MJ advised that amendments had been made to IGT145 and the Modification was up to date. MJ stated that the Modification had changed to Self-Governance rather than Authority Decision to align with the UNC equivalent Modification, UNC0664VVS, and this had been reflected in the 'Justification for Self-Governance' section. It was noted that Section four, Code Specific Matters, would need updating as the reference links did not work correctly.

MJ highlighted that under the impacts section, they had removed the concept of a lock-out period due to system constraints related to the Faster Switching Programme. There had also been an amendment made to Section 9.3 as the numbering had been changed to be consistent with UNC0664VVS.

MJ advised that Business Rule 11 had been added in to clarify Shipper targets. MJ noted that it would be the Shipper's responsibility to meet requirements under the Code and they should not be assigning to Suppliers without any responsibility on their behalf.

The Chair stated that the Code Administrator would amend the timetable for the Modification and the UNC legal text would be reviewed. The Chair asked if IGT154 could follow UNC0664VVS rather than progress in parallel as the scheme applied to the IGT UNC as well as UNC sites. MJ agreed, stating that Xoserve would have plenty of time to work on the Modification and there would not be an issue with when it would be applied. MJ advised that they would bring back the revised timescales to the next Workstream meeting once they had received clarification on these. JL advised that the final Workgroup report for UNC0664VVS was being issued for consultation and was due to go to Panel for voting, and the equivalent Xoserve Modification, XRN4990, was progressing to develop the solution. JL advised that XRN4990 would need reassessing due to changes made to UNC0664VVS.

The Chair stated that the Workgroup report for IGT145 should be completed in the next Workstream meeting and then taken to the Panel in August 2021. The Chair noted that all issues and challenges on this topic had been brought out in discussions under the UNC, and IGT145 would bring the IGT UNC up to date with all the revisions. JR asked if there were any outstanding concerns on the issues that had been raised. MJ stated that one concern had been raised during UNC consultation that some Shippers had linked customer contacts to classes, which had meant that sites had been taken out of a class and there was a potential impact to customer contracts.

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

**6. IGT154 – Introducing the concept of a derogation into the IGT UNC for Net Zero innovation project**

HW advised that the UNC equivalent modification, UNC0760 (Introducing the concept of a derogation framework into the UNC) had been discussed at length at the last Governance Workstream on Tuesday 6<sup>th</sup> July 2021. It was noted that the proposer had not had sufficient time to update IGT154 before this meeting, but an updated version would be provided prior to the August IGT UNC workstream meeting. HW advised that a few amendments had been made to UNC0760 and the legal text had been created, which led to a lot of comments in the Governance Workstream.

The Workgroup heard that most of the discussion held at the Governance Workstream focussed on how the Panel will make decisions on derogations, as the normal Modification Relevant Objectives would not be applicable. There were criteria raised that the Panel consider the benefits in the wider sense, including cost benefits, impact on consumers, competition and other parties.

HW noted that updates needed to be made to the Business Rules set in IGT154. The First one would be the inclusion of a backstop date, as there was a proposal that Panel should be able to set backstop start and end dates to prevent a derogation being dormant for an extended period. Another amendment would be to add in the definition of 'Net Zero' that the UNC had provided in UNC0760. HW stated that once these changes had been made, the Modification would be sent to the Code Administrator.

HW noted that, as IGT154 was not an exact copy of UNC0760, the IGT UNC would need to include its own derogation process in its legal drafting rather than point to the UNC for direction. The Workgroup heard that the next Governance Workstream meeting had been scheduled for five days before the next IGT UNC Workstream meeting, enabling time to update the Modification ready for discussion.

The Chair asked about timetable for IGT154, stating that it seemed unlikely that the Modification could return to the IGT UNC Panel in August 2021. The Chair added that the legal text would be needed to aid discussion due to challenges that had arisen in the UNC Governance Workstream and the Code Administrator would produce the first draft and make it available for the next IGT UNC Workstream. JR noted that the Governance Workgroup had stated that they would review the Modification in August 2021 provided that they would be on track to reach the September 2021 Panel meeting. HW advised that the two Modifications should be aligned so that they would be implemented within the same month. The Chair agreed that the legal drafting for IGT154 would be produced and the Workgroup would begin the Workgroup report in August 2021. HW raised concerns that the UNC Modification would not get to Panel until September 2021. CM stated that actions had been taken offline to discuss the Modification further, therefore hopefully it would be completed in September

2021. JR stated that this would mean the earliest Panel that IGT154 could be discussed at would be the September 2021 meeting.

#### 7. [IGT157 - Adding the Local Authorities as a new User type to the Data Permissions Matrix \(DPM\)](#)

CH advised that there had been some controversy in the UNC Workgroup when discussing the UNC equivalent to IGT157, UNC0769S, as there had been a question raised about what the local authorities would do with the data they received and if they would use it to penalise local businesses or residences. CH noted that IGT157 aimed to put local authorities into the Data Permissions Matrix (DPM) so that they have the ability to request data but the granting of that data would still be reliant on the business case that they put forward to the Data Services Committee (DSC).

The Chair asked if discussions would be held about individual local authorities by the DSC. CH stated that their understanding was that that would happen, but it was not stated explicitly in the Modification. The Chair asked if a business requirement would be received from each local authority for a decision to be made individually. CM and JR agreed, with JR stating that the UNC Distribution Workgroup had agreed that it would be done on a case-by-case basis.

The Chair suggested that with government climate targets there may not be a natural gas network by 2050 and asked if there were targets between the present and 2050 that would have to be met by local authorities. JR advised that the next stage of discussion would be on what the local authorities would use the data for and there had been some discussion that the end user should have a say on how the data would be used. It was noted that if access to the required data was not forthcoming, then there would be a possibility that the gas industry would be seen as a blocker to carbon emissions reductions.

The Chair stated that Shippers should hold discussions with their suppliers, as it was suppliers who would generally provide end user's data. The Chair added that, in data protection terms, the Information Commissioner's Office (ICO) had declared that as part of the Retail Energy Code (REC) analysis, MPRNs level data would be classed as personal data. If local authorities wanted that level of detail, then due diligence should be applied and most likely create a risk report for data protection purposes.

The Chair asked the Workgroup if they thought the timetable for IGT157 should align with UNC0769S and complete the Workgroup report in the next Workstream meeting. JR stated that it would make sense to keep the two Modifications aligned, however if UNC0769S was rejected, there should be no reason why IGT157 should also be rejected or withdrawn if the Panel supported it. JR asked if Xoserve could accommodate the Modification for IGT sites only. JL confirmed that Xoserve could facilitate this.

The Chair stated that data protection law would override anything written into Code so it would be important that parties agreed with the Modification. The Chair added that further discussion could be held at the Workstream meeting in August 2021, with the view of completing the Workgroup report in that meeting.

## **Operational Issues**

### **8. CSEP NExA Tables**

The Chair informed the Workgroup that the exercise for the CSEP Network Exit Agreement (NExA) Tables had been completed and the tables had been published in June 2021. The Chair advised that the normal procedures had applied and the figures had been calculated and presented in the tables.

JR stated that there had been one small IGT who was not able to input their figures, but they believed this would have minimal impact as they recorded low volumes. The Chair questioned whether this issue should be taken to the Panel, as IGTs were required under Code to undertake the exercise. JR agreed with this approach but stated that the IGT had since been made aware of the process and that their contribution was required going forwards, JR stated that if the same issue were to happen in the following year, then action would need to be taken due to materiality impacting the NExA tables. The Chair proposed that the discussion be taken to the Panel, as it could impact whether the Panel decide to accept the tables.

The Chair advised that the tables would be used to apply Annual Quantities (AQs) to new-builds that fall into the relevant categories. The Chair added that they would be used until meter reading provided indicated what the values should be. The Chair asked the Workgroup if they were happy to endorse the CSEP NExA tables and recommend application to the Panel. The Workgroup agreed by consensus and there were no further comments.

## **Standing Items**

### **9. Cross-Code Modification Implications Tracker**

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

**UNC0746 - Application of Clarificatory change to the AQ amendment process within TPD G2.3 from 1st April 2020** – The completed Workgroup Report has been made available on the Joint Office website. The finalised Workgroup Report will be presented to the June 2021 UNC Panel. The Workgroup agreed the Legal Text delivers the intent of the modification.

**UNC0734S - Reporting Valid Confirmed Theft of Gas into Central Systems** – The UNC Workgroup determined that once a solution where meter readings and zero incremental readings is finalised, Workgroup should then be able to progress the modification through to Workgroup Report

stage and Legal Text can be requested. As there has been no legal text released, the Code Administrator cannot assess whether changes will be needed to the code.

**UNC0674 – Performance Assurance Techniques and Controls** – UNC0674 has sent back to workgroup for up to six months. The IGT UNC Panel deferred decision on IGT138 to align with the UNC modification. The Panel agreed that if any changes were made to UNC0674 then IGT138 would need to be sent back to the Workgroup for further development.

**UNC0692S - Automatic updates to Meter Read Frequency** – The UNC implementation date has been issued as 5th November 2021 (November Major Release). The official notice of implementation has been issued and the XRN4941 has been agreed to be included in November release. The Proposer of IGT131 will withdraw the Modification. An email will be sent out to industry to ensure all parties are aware of the implementation of UNC692S and its impacts on IGT Supply Points. The Modification also has a dependency on the implementation of SEC mod MP077 ‘DCC Service Flagging’ which could be implemented in November 2021.

#### **Other cross-code updates**

JR stated that they had raised a new Modification, UNC0773 (Introduction of a Micro Business identifier in Central Systems) at the UNC Panel and this would need an IGT UNC equivalent Modification. The Chair stated that they would contact the Proposer to see if they would be able to attend the next IGT UNC Panel meeting for a discussion on the new Modification.

[Post meeting note: This modification has now been withdrawn]

The Chair noted that they had received a revised notice of implementation for UNC0710 (CDSP provision of Class 1 read service) stating that the implementation date would be April 2023. The Chair also noted that they had found that the equivalent XRN change, XRN5218, had been withdrawn, but no explanation had been received. CM advised that XRN5218 had been withdrawn as contractual issues couldn’t be resolved and a new Modification had been raised, XRN5379. It was noted that this would be for procurement activity that Xoserve/Corella would undertake to obtain the Class One Service Provider at the appropriate time.

The Chair also noted that IGT131 (Automatic updates to Meter Read Frequency) had been withdrawn, as the UNC equivalent Modification, UNC0692S was applicable to the IGT UNC. The Chair advised that this would be indicated to parties and include a notification that UNC0692S to that effect. JL stated that the implementation date for UNC0692S had been issued as 5<sup>th</sup> November 2021.

The Workgroup acknowledged the update and had no further comments.

#### **10. [IGT UNC Known Issues Register](#)**

ALB advised that there had been no new additions to the Known Issues Register prior to the meeting.

## 11. AOB

### Invoice Backing Data and Portfolio Extract issues

CM advised that, in recent months, E.ON had been experiencing a number of issues relating to the receipt of invoice backing data and the portfolio extracts and wanted to understand if this had been an issue for other parties. It was noted that the issues have had internal impacts, such as impacting the month end reporting process.

The recent issues include:

1. Missing portfolio extracts:
  - After chasing some data was still not received.
2. Incorrect Passwords being applied:
  - Password supplied for Feb 2021 is still being used in June 2021
  - An IGT applied a password which had not been provided.

The Workgroup stated that they were not aware of experiencing the same issues and CM agreed to hold discussions offline with the affected individuals.

### IGT132V - Introduction of IGT Code Credit Rules

The Chair informed the Workgroup that Ofgem had sent back the Final Modification Report (FMR) for IGT132V, which BUUK had raised. Ofgem indicated that they did not have sufficient information in the Workgroup report and had recommended a particular technique to get information, which the Code Administrator was investigating. The Chair advised that IGT132V would be going to Panel and would likely return to the Workgroup for further discussion. They advised the Workgroup to read Ofgem's notice on the IGT UNC website.

The Chair noted that, as the Code Administrator, they would give their best efforts to take the Workgroup through what was needed to get the required information. The Chair highlighted that the topic of engagement and participation was linked to this and noted that this had been a recurring issue. The Chair encouraged the Workgroup to attend future meetings for discussion.

### IGT156 – Retail Code Consolidation SCR

The Chair noted that IGT156 had been sent to Ofgem for decision and that licence changes had been confirmed for no earlier than 1<sup>st</sup> September 2021. As a result of this, the Chair advised that they were anticipating that IGT156 would be given an implementation date of 1<sup>st</sup> September 2021, which would mean an extraordinary release for Code would be necessary.

### **Supplier Deeds of Undertaking**

The Chair advised that the topic of Supplier Deeds of Undertaking had been discussed at a previous Workgroup and it had been indicated that there were Shippers whose Suppliers did not have Deeds of Undertaking. The IGTs had proposed a new standard template for the Deed of Undertaking and all Suppliers were being asked to sign this.

It was highlighted that further discussion was needed offline.

### **IGT Framework Agreements**

The Chair advised that the Code Administrator had received requests from Shippers for a Framework Agreement, but this was not something that the Code Administrator had access to. CH advised that the Framework Agreement was a document that Shippers had to sign in order to accede to individual network codes, and they should contact the IGTs directly for access to the document.

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, 8<sup>th</sup> July 2021.**