

## IGT UNC Modification Panel Meeting

### Final Minutes

Friday 24<sup>th</sup> September 2021

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Sandra Fawzy	SF	Gemserv	Code Administrator	
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	

#### 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. The Chair noted that they had three items of AOB regarding the 'Audio Policy', "UNC 0674 Performance Assurance Techniques and Controls" and IGT140 – Changes to the IGT Panel Rules".

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

#### 3. Approval of the previous minutes (21-08 and 21-08 Reconvened)

SF presented the Panel with suggested amendments received prior to the meeting on the previous minutes (21-08 Reconvened), a comment had been received by HW regarding official cross code working groups and the order of the wording, 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

SF informed the Panel that there were three outstanding actions:

**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), views had been sought and a reminder had been sent again recently. HW advised that she was due to receive a response on a meeting on Monday 27<sup>th</sup> September. It was agreed that the action would be carried forward to the next Panel meeting on the 29<sup>th</sup> October 2021.

**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 notified the Panel that he had flagged with the Distribution Networks (DN) and the Joint Office regarding adding in additional impact assessments for the IGT UNC into Modification Proposals Forms but has not had any substantive discussions as of yet. It was agreed that the action would be carried forward to the next Panel meeting on the 29<sup>th</sup> October 2021.

**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 notified the Panel that he had flagged with DNs and the Joint Office regarding the process of creating/hosting joint working groups but has not had any substantive discussions as of yet. It was agreed that the action deadline would be extended until the 29<sup>th</sup> October 2021 when the next Panel meeting is scheduled.

### **Final Modification Report**

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

The Chair took the Panel through the Final Modification Report (FMR), initially by reminding the Panel of the purpose of the Modification. The Local Authorities (LAs) have an ambition to lead the reduction of carbon emissions in their locality, to carry out this ambition LAs need to access data relating predominantly to consumers addresses and gas usage in order to target engagement with such consumers and monitor strategy outcomes. The Modification seeks to amend the UNC Data Permissions Matrix (DPM) to add LAs as a new User type. The Chair reminded the Panel of their decision that it should proceed to a 14-day consultation period and that the Final Modification Report (FMR) be considered at today's meeting as a short notice paper.

The Chair took the Panel through the three responses, all three respondents offered full support for the Modification and agreed it is a Self-Governance Modification, that the Modification met the Relevant Objective F (Promotion of efficiency in the implementation and administration of the Code) and agreed that the implementation should be aligned with the equivalent UNC Modification 0769 - Adding Local Authorities as a new User Type to the Data Permissions Matrix, in the next available

release. One responded agreed there was no requirement for any legal text as this was only an enabling Modification, the other two respondents did not comment on the legal text.

There was an issue of Data Protection raised, about what data is to be released and how permissions might be obtained if necessary for example, consumer addresses. This matter would need to be considered by the Data Services Committee (DSC) who would decide what information Local Authorities would see if this enabling Modification was implemented.

The Panel agreed that the Modification should be implemented by a unanimous vote. The Panel agreed that subject to the 15-day appeal window, that Modification IGT157 will be implemented in alignment with UNC0769 (Adding Local Authorities as a new User Type to the Data Permissions Matrix) on a date to be confirmed and coordinated between IGT UNC and UNC administrators.

### **Workgroup Report**

#### **6. IGT145S -Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4**

The Chair took the Panel through the Workgroup Report giving a summary that the Modification was an IGT UNC equivalent of UNC0664VVS (Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4) and that the IGT Modification is aligned with that Modification. The Purpose of the Modification is to create a requirement to move Supply Points with low Valid Meter Reading submission performance from Classes 2 and 3 into Class 4, following a consecutive period of poor performance. The CDSP will automatically move any Supply Points not moved by the Shipper in such a scenario (after an allowed period of time).

The Panel were informed that the Workgroup agreed with the Proposers view that IGT145S should proceed as Self-governance as there are no material changes impacting competition or governance being made in the IGT UNC and this was also the final position of UNC664VVS. The Panel agreed with the Workgroup that the Solution delivered the intention of the Modification.

The Panel were informed that the Workgroup discussed Consumer impacts; the Workgroup resolved that the benefits to the IGT UNC would come through the UNC through the billing and settlement charges. There would not be any impact to billing and charging through the IGT UNC. The application of the solution in the UNC would have a positive efficiency impact on the IGT UNC.

It was noted that the Workgroup agreed with the proposers view that Relevant Objective D (Securing of effective competition) would be positively impacted by this Modification for Shippers and Suppliers, and that there may be potential positive impacts on Relevant Objective F (Promotion of efficiency in the implementation and administration of the Code) as the same rules will now be brought in for both IGT and GDN Supply points.

The Panel agreed that the Workgroup suggestion that implementation should be no earlier than November 2022 as these Modifications would be implemented post CSS (Central Switching Service) implementation. It was accepted that the Workgroup's assertions that implementation for all three changes (IGT, UNC and XRN) will still need to be aligned.

The Panel accepted the Workgroup's view that the legal text facilitated the intention of the Solution.

The Panel unanimously agreed that the Workgroup had sufficiently developed IGT145S and it should be sent for a 15 Working Day consultation period closing on 18<sup>th</sup> October 2021 and to be discussed on 29<sup>th</sup> October 2021 at the next Panel meeting.

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

The Chair took the Panel through the Workgroup Report giving a summary that the Modification Proposal is linked to UNC0760 raised by Northern Gas Networks and is intended to ensure that any derogations to the UNC are applied appropriately within the IGT UNC where the derogation affects one or more IGT network. It is also intended to provide scope for similar derogations to be raised to the IGT UNC specifically should that be appropriate in the future.

It was clarified that the Modification currently supports derogations that are in support of net-zero aspirations but that the Modification would support derogations for other reasons if the new reasons are added into code by a further Modification. This also mirrored the UNC Modification.

The workgroup and the Panel both agreed with the Proposer's view that this Modification should proceed under Authority rules. The Chair notified the Panel that there was a discussion on how consumers will be affected by the processes being implemented by the Modification. It was noted that the Modification will pave the way for innovators to come into the market and that trialling is a very important aspect of assessing impacts, both positively and negatively on Consumers. For instance, a derogation could be ended if negative impacts on Consumers were found and therefore the effects should be relatively short term and ringfenced. The Workgroup equally discussed that derogations could find unintended benefits for Consumers that can be potentially rolled out across the wider industry if discovered. The Workgroup also discussed the elements of curtailing 'commercial gain' which is an element of UNC0760 has not been included in IGT154.

The Panel agreed with the Workgroup that the Legal text drafting and Ancillary Document facilitate the Solution.

The Panel unanimously agreed that the Workgroup had sufficiently developed IGT154 and it should be sent for a 15 Working Day consultation period closing on 18<sup>th</sup> October 2021 and to be discussed on 29<sup>th</sup> October 2021 at the next Panel meeting.

## **Update on Workgroups**

### **8. Workgroup Summary**

AJ notified the Panel there was a lengthy discussion regarding the RFI questions for both Shippers and IGTs. The main issues were the RFI being too long, the questions not specified enough and the lack of credit knowledge in order to design the questions. It was agreed that if the questions are too long and not specific that there may be a low response rate, particularly from shippers. The Workgroup spent a significant amount of time discussing the questions and what sort of answers they need to be looking for. It was agreed that they should not steer too far away from Ofgem's questions and a list of ideas were agreed.

AJ notified the Panel that they are in the process of redrafting the RFIs for both IGTs and Shippers, with the input from a Shipper and a Shipper's Creditor, with a view of the October Workgroup reviewing the RFIs before finally being sent out to IGTs and Shippers to complete.

JR confirmed that the credit cover in the Modification covered transportation costs only.

## **Authority Updates**

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

## **AOB**

### **10. Audio Policy**

AJ notified the Panel that the Workgroup meeting on 9<sup>th</sup> September was recorded using Teams with the consent of all the attendees as the meeting was lengthy and complicated. AJ reminded the Panel that an Audio Policy had been raised previously in 2020 but was later withdrawn.

AJ reminded the Panel that both REC and Ofgem record meetings and it was a good time to raise the Audio Policy again.

SF notified the Panel that Microsoft Teams can record meetings and they are placed into the chat window after the recording has ended. However it is instantly removable so that only Gemserv/meeting host hold the recording.

RP stated that there was not any detail in the Audio Policy paper regarding Data Protection and AJ responded that it would be held under the Gemserv Data Protection Policy and if that was not in the policy then that was an important oversight. It was agreed that SF will review and amend the Audio

Policy to ensure the inclusion of Data Protection which would be aligned to the Gemserv Data Protection Policy in time for the next Panel meeting in October 2021.

It was agreed that as all Panel members had not yet read the Audio Policy paper that the decision on the Policy would be deferred until the October 2021 Panel meeting.

**ACTION: 21/09 – 01 SF to review and amend the Audio Policy in line with the Gemserv Data Protection Policy in time for the next Panel meeting in October 2021.**

#### **11. UNC 0674 Performance Assurance Techniques and Controls**

AJ notified the Panel briefly that UNC 0674 workgroups have resumed and that it was the intention of the Proposer to vary the Modification. The decision on how the IGT UNC equivalent Modification, IGT138 – Performance Assurance Techniques and Controls, should proceed had been deferred. The Panel agreed that the workgroup might need to consider those changes and that IGT 138 be added as an agenda item at the October Panel meeting to decide if it should be referred back to the Workgroup.

#### **12. IGT140 – Changes to the IGT Panel Rules**

AJ notified the Panel that IGT140 – Changes to the IGT Panel Rules has been rejected by Ofgem and that the decision letter is [online](#). JS encouraged the Panel to read the decision letter.

**The next IGT UNC Panel is scheduled for 29<sup>th</sup> October 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 – October 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	Carried Forward – October 2021 update
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	Carried Forward – October 2021 update
21/09 – 01	24/09/2021	Review and amend the Audio Policy in line with the Gemserv Data Protection Policy in time for the next Panel meeting in October 2021	SF	New