

IGT UNC Modification Panel Meeting

Draft Minutes

Friday 24th October 2021

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Sandra Fawzy	SF	Gemserv	Code Administrator	
Talia Addy	TA	Gemserv	Code Administrator	Observer
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	
Scott McPhillimy	SM	Ofgem	Authority	Alternate for Jennifer Semple (JS)

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 provided for Jennifer Semple (JS) from Ofgem and Scott McPhillimy (SM) was the Ofgem representative.

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 five items of AOB regarding the 'Audio Policy', "Performance Assurance Annual Review being conducted by PAFA", "Must Read process", "Impacts of Shippers and /or Suppliers going out of business" and "UNC / IGT UNC Cross-Code Working Update".

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

3. Approval of the previous minutes (21-09 and 21-09 Reconvened)

SF informed the Panel that no comments had been received for the 21-09 Minutes before the meeting. 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 four 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. It was agreed that this action would be considered closed.

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 was not present at the meeting and it was agreed that this action point would be picked up at the next Panel meeting in November.

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 was not present at the meeting and it was agreed that this action point would be picked up at the next Panel meeting in November.

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 it was agreed that this action had been completed and would be discussed under AOB. It was later agreed that this action would be considered closed.

Final Modification Report

5. [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 Final Modification Report (FMR) for IGT145S, the purpose of the Modification is to create an obligation for Shippers 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 Chair reminded the Panel of their decision that it should proceed to a 15-day consultation period and that the Final Modification Report (FMR) would be considered at today's meeting.

There were three consultation responses; all three respondents offered full support for the Modification and agreed it is a Self-Governance Modification. Two of the respondents agreed the Modification met the Relevant Objective D (Securing of effective competition) and one respondent agreed that it met the Relevant Objective F (Promotion of efficiency in the implementation and administration of the Code).

The Panel unanimously agreed that the Modification has no impact on a Significant Code Review (SCR), that the Modification met both Relevant Objective D and F, that the legal text facilitated the intention of the Solution and it should be implemented with an effective date aligned to the UNC equivalent modification UNC 0664VVS.

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

The Chair took the Panel through the Final Modification Report (FMR) for IGT154, the Modification Proposal is linked to UNC 0760 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 Chair reminded the Panel of their decision that the Modification should proceed to a 15-day consultation period and that the Final Modification Report (FMR) should be considered at today's meeting.

There were three respondents to the consultation and all three offered full support for the Modification and agreed that Authority Consent is required. All the respondents agreed that the Modification met Objective F (Promotion of efficiency in the implementation and administration of the Code) and two respondents agreed that it met Objective B (Coordinated, efficient and economic operation of the combined pipe-line system; and/or the pipe-line system of one or more other relevant gas transporters). All three respondents agreed that the legal text delivers the intent of the Modification and that the Modification does not make changes to the central system. The respondents also agreed that the Modification should be implemented in the next available release of the IGT UNC following an Authority determination and is not co-dependent on a similar UNC code.

The Panel unanimously agreed that IGT154 should be subject to Authority decision, that the Modification does not impact any current SCR and after a discussion regarding the relevant objectives B and F, the Panel unanimously agreed that the Modification positively impacted both objectives for the reasons outlined by the proposer. The Panel also noted that although the Modification has the same intent as the UNC Modification UNC 0760, the Modification could stand alone from the UNC Modification and that derogations could be implemented in the IGT UNC alone if the Modification was implemented. However it was also noted that the IGT Modification makes it possible for an UNC derogation (if UNC 0760 is implemented) to be implemented in the IGT UNC where the UNC

Modification has a downstream impact on an IGT network, on the basis that all IGT UNC parties are also parties to the UNC and could make representations as appropriate through UNC governance.

The Panel unanimously agreed to recommend that Modification IGT154 be implemented and that it could be brought back to Panel if an early implementation date is needed.

Existing Modifications

7. IGT138 – Performance Assurance Techniques and Controls

The Chair gave a summary of the Modification, the Modification is proposed by Scottish Power following discussion with and the support of the Performance Assurance Committee (PAC) and it is to provide an effective framework for the governance of industry performance that gives industry participants mutual assurance in the accuracy of settlement volume allocation.

The Modification was sent out to consultation on 23rd April 2021 and on 25th June 2021 at the Panel meeting, the Panel went through the Final Modification Report (FMR). There was a discussion regarding the UNC equivalent Modification, UNC 0674 which would be returning to the UNC Workgroup for a period of up to six months following issues that had been identified after the UNC consultation. As a result, the Panel unanimously agreed that decision on Modification IGT138 should be deferred until the full impacts from the Workgroup discussions were understood for the UNC Modification and that the IGT UNC should monitor the progress of UNC 0674.

The Chair informed the Panel that as part of the Workgroup discussions it had been identified that Modification UNC 0674 would be varied and that any variations would likely impact IGT138, which essentially is a modification which points into the UNC. CR agreed to contact the proposer for an update on the details of the variations made to UNC 0674.

The Chair recommended that Modification IGT138 be sent back to the December Workgroup, not the November Workgroup, in order to give sufficient time for the UNC 0674 variations to be published and to give Workgroup parties the opportunity to consider these variations. The Panel accepted the recommendation and the Panel unanimously agreed IGT138 should be sent back to the December Workgroup.

ACTION: 21/10 – 02 CR to contact the proposer (Mark Bellman) for an update on the details of the variations made to UNC 0674

8. RG005 – IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements

The Chair explained to the Panel that the reason RG005 – *IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements* was on the agenda was because there has been a request by Ofgem to bring the legal drafting forward as they plan on consulting on it in December 2021. The legal drafting for the IGT UNC has already been completed but there has been updates from Xoserve which were received two weeks ago. The Chair explained that it was hoped that the legal drafting would be available for the November 2021 Workgroup meeting and it will be on the agenda. The timings are tight to ensure the drafting is ready for December 2021.

The Chair explained that there are three strands to RG005 Strand 2 and 3 have been implemented with REC version 2 on 1st September 2021, so the focus is solely on Strand 1. Strand 1 is about understanding the impact of the delivery of the Central Switching Service (CSS) on the IGT UNC. There is going to be a new system for switching, that system is the Central Switching Service (CSS), it had previously been a Shipper led activity but will now be a Supplier led function. The switch is to be initiated through the CSS and it will inform Xoserve systems and (provided Suppliers and Shippers have an appropriate relationship) the switch will be effective through Xoserve systems. There will be a dedicated release for this on or around 13th June 2022.

In the past the Workgroup review has completed work on all three Strands and there has been legal text that has been drafted. However the legal text will need changes to be made and ideally the November Workgroup will need a week before the meeting to review the legal drafting. As timings are tight the Chair notified the Panel that they may need to set up an extra ordinary Workgroup meeting to meet Ofgem's deadline of December 2021. In addition to this the Chair understands that there may be further variations by the UNC in the coming months. One example of differences between the UNC and IGT UNC is the UK Link's system treatment of new connections and although the functionality within the system is available the governance of the process needs to be considered.

The Panel unanimously agreed to send RG005 back to Workgroup.

JR suggested that the Panel should seek clarification of the consequences of not meeting the Ofgem December 2021 deadline and that a formal response be made to Ofgem on the timings for the work.

It was noted that in addition to the faster switching work, the UNC were now addressing the transition to the new system in UNC modification 0784S - Transition to the Central Switching Service and the Retail Energy Code v3.0. It was acknowledged that the transition would be the same for UNC and IGT UNC sites, but that an equivalent Modification would be needed in the IGT UNC and that a sponsor would be required. The Chair recommend that parties should all attend the UNC Workgroup meetings so they have some influence on the discussions.

HW agreed to email Dave Addison in regard to raising a IGT UNC equivalent Modification.

ACTION: 21/10 – 01 HW to email Dave Addison in regard to raising a IGT UNC equivalent Modification for UNC0784S - Transition to the Central Switching Service and the Retail Energy Code v3.0

Workgroup Summary

9. The Panel had no further questions regarding the Workgroup Summary Paper.

Authority Updates

10. Authority Updates

SM informed the Panel that there were no updates and there were no questions from the Panel to submit to Ofgem.

AOB

11. Audio Policy

The Chair took the Panel briefly through the Audio Policy and SF explained that the Audio Policy paper had been updated in line with the Gemserv Data Protection Policy. The recording will be kept until the minutes have been finalised and accepted by the meeting attendees as a final and accurate record.

The Chair explained that other Code Administrators have been recording meetings for accuracy purposes and the IGT UNC Audio Policy has been created to formerly clarify the same purpose.

JR and SM both agreed that the recordings of meetings would be a good idea if it added to the accuracy of the minutes so long as attendees were notified at the start of every meeting that they were going to be recorded.

The Panel formerly endorsed the Audio Policy and it was agreed that it will be published onto the IGT UNC website.

12. Performance Assurance Annual Review being conducted by PAFA

There was an Annual Review being conducted by PAFA on behalf of the PAC, the Chair did have the intention of encouraging Panel members to give their feedback, however the review closed the day before the Panel meeting so the agenda item was no longer relevant.

13. Must Read process

CR gave an update to the Panel that Scottish Power have been reviewing the Must Reads process with Xoserve, as a part of the CMS re-build. Scottish Power have concerns about the Xoserve Must Reads Process. CR believes that the changes might increase the Must Reads pot for IGTs. JR thought that the IGT UNC Must Reads obligation included using reasonable endeavours to obtain the reads that have not been collected by Shippers and therefore, would potentially have no impact, as the IGTs could only obtain what they were reasonably able to.

This will be discussed under CMS re-build discussions, connected to UNC 0692S. JR stated a preference that the discussions were inclusive of all parties together, rather than separate constituency discussions, so that the process agreed would best meet all parties' requirements, including Shippers. It was agreed that there could be resulting Change Requests (CRs) from the CMS re-build.

As a result of the implementation UNC 0692 and automatic updates to meter read frequency, it is anticipated there will be an increase in the volume of sites that will enter the Must Read process. The large Distribution Networks (DNs) took the decision not to visit these sites as part of XRN5036, IGTs were not included in the discussion as part of this Change Proposal.

At present Product Class (PC) 4 sites fall into the Must Read process after 24 months and post implementation of the modification this could be up to 3 times a year for IGTs. Discussions are ongoing with Xoserve to have a review of the Must Read process and the IGT representatives welcomed joint discussions.

14. Impacts of Shippers and /or Suppliers going out of business

The Chair recognised that there is an ongoing time of upheaval in the energy sector particularly the gas sector where many Shippers and Suppliers are going out of business. Panel members were invited to discuss any impacts or consequences to their company and or the industry that might ultimately have an impact for the IGT UNC and might be useful to highlight.

HW asserted that a lot of the UNC Modifications that have come through recently are about maintaining a system balance and are not having a knock on effect on the IGT UNC.

JR highlighted that UNC Modifications 0788 (*Urgent*) - *Minimising the market impacts of 'Supplier Undertaking' operation* and 0789 - *Energy Balancing Arrangements During the Operation of a Supplier Undertaking to Transporters Deeds of Undertaking (DOU)* effect IGTs and Xoserve are picking up on this matter.

It is expected that an application of consistency for DOUs for DNs and IGTs will be necessary and as a result there could be two DOU templates; one for DNs and one for IGTs.

CH highlighted that there could potentially be a lot of manual work with regards to invoicing in the current climate as the circumstances required more manual intervention and that there may be a knock on impact to the timings around the issuing of invoices.

15. UNC / IGT UNC Cross-Code Working Update

The Chair acknowledged that Richard Pomroy Distribution Network (DN) Representative was not present at the meeting and continued to give the Panel an update of a meeting the Chair had with Richard Pomroy and Penny Garner from the Joint Office where they discussed cross code working and the Chair read out the following extract from the UNC Panel minutes in October 2021:

“278.14 AOB

a) IGT Cross Code Impact Assessment RP explained he had been attending the IGT UNC Panel as an observer as Distribution Network Operators (DNs) want to build a relationship between the UNC and IGT UNC parties.

RP advised that subsequently closer working practices have been agreed between the IGT and UNC Code Administrators to enable earlier and better identification of Cross Code impacts.

RP expressed his hope that this would allow administration issues between the two Codes to improve.

RP added that Cross Code Workgroups have also been discussed and may enable some of the current issues being experienced to be addressed.

PG noted that the Joint Office will:

- include a formal Cross Code impact vote for the UNC Modification Panel determinations.*
- continue to include the IGT UNC Representative at Panel and other UNC Workgroups.*
- actively try to identify any IGT impacts.*

AJ thanked PG for the changes being implemented and noted she would report back to the IGT UNC Panel and provide any feedback received.”

The Panel agreed that this was a positive step in cross code working and in particular cross communication. The Chair explained that having early email notifications is important, in the past this has not been the case and there has been a change observed.

With regards to cross-code meetings, it was agreed by the Panel that the interests of the IGTs do vary from the large DNs and when UNC meetings are chaired it is important that the Chair is aware of the workings of the IGTs. It is important that joint meetings consider the needs of all party constituencies equally.

The timings are a matter of importance, ensuring that notice and sufficient time is given and in the past there has been a lack communication.

The Panel agreed that feedback to Joint Office should be that meetings should be Joint between the UNC and IGT UNC with equal weight given to both Codes and that references to both UNC and IGT UNC codes should be in the agenda, not just the UNC Modification.

The Chair notified the Panel that there is a good working relationship with Mike Berrisford at the Joint Office and a good example of cross code working can be demonstrated with the communication of the implementation date of *IGT157 – Adding Local Authorities as a new User Type to the Data Permissions Matrix* and the equivalent UNC Modification.

It was agreed that a Ways of Working strawman could be developed for cross code working. AJ agreed to develop the Ways of Working strawman and would bring it back to Panel for review.

JR thanked the Code Administrators for their hard work, patience and tact at handling cross code matters.

ACTION: 21/10 – 03 AJ to develop the Cross Code Ways of Working strawman and to bring back to Panel for review.

The next IGT UNC Panel is scheduled for 26th November 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	Closed
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	Closed
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 – November 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 – November 2021 update
21/10 – 01	29/10/2021	HW to email Dave Addison in regard to raising a IGT UNC equivalent Modification for UNC0784S - Transition to the Central Switching Service and the Retail Energy Code v3.0	HW	New

21/10 – 02	29/10/2021	CR to contact the proposer (Mark Bellman) for an update on the details of the variations made to UNC 0674	CR	New
21/10 – 03	29/10/2021	AJ to develop the Cross Code Ways of Working strawman and to bring back to Panel for review.	AJ	New

DRAFT