

## IGT UNC Modification Panel Meeting

### Draft Minutes

Friday 25<sup>th</sup> February 2022

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Jenny Rawlinson	JR	BUUK	Pipeline Operators	
Chris Barker	CB	BUUK	Proposer (IGT132VV)	Only present for items 1-5
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Heather Ward	HW	Energy Assets Pipelines	Pipeline Operators	
Claire Roberts	CR	Scottish Power	Pipeline User	
Jennifer Semple	JS	Ofgem	Authority	
Talia Lattimore	TL	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 (CA) 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 Richard Pomroy (Wales and West Utilities).

### 2. Confirmation of Agenda

The Chair confirmed the items for discussion as outlined in the final agenda. The standing item *Workgroup Summary* was not on the agenda as the Modifications and Review Group discussed at the February Workgroup meeting are individual items on the Panel agenda.

The Panel were invited to add any items for AOB:

- HW added item 10 - 0799 - *UNC arrangements for the H100 Fife project (100% hydrogen)*; and
- The CA added items 11 - *Statutory Consultation on licence changes for the Switching SCR: Standard conditions of Gas Shipper, Gas Transporter and Electricity Distribution licences* and 12 - *IGT UNC February 2022 Release*.

### 3. Approval of the previous minutes (22-01 and 22-01 Reconvened)

The CA invited comments on the January 2022 minutes, noting that no comments had been received prior to the meeting. No comments were raised during the meeting and the minutes (both standard

and reconvened meetings) were approved as a true and accurate account of the meetings.

#### 4. Outstanding Actions

The Panel were informed that there were no outstanding actions for this month but there is one pending action for March 2022: **21/10 – 03 AJ to develop the Cross Code Ways of Working strawman and to bring back to Panel for review. The Panel agreed that this strawman should also include details of how Joint Workgroups would work.**

#### Existing Modifications

##### 5. [IGT132VV - Introduction of IGT Code Credit Rules](#)

The Chair took the Panel through a brief recent history of IGT132VV:

- **July 2021:** Ofgem sent back the Modification requesting further information and analysis, highlighting specific areas in the form of categorised questions (page 41 of the [IGT132VV Workgroup Report](#)). The Panel returned the Modification to the Workgroup;
- **Aug - Sep 2021:** The Workgroup and the CA drafted a Request For Information (RFI);
- **Oct – Nov 2021:** The RFI was issued to all of industry for 20 working days with separate questions for IGTs and Shippers. The RFI closed and a total of three IGTs and three Shippers responded. The full list of questions, as well as a summary of responses and Workgroup observations, can be found in [Appendix 3](#) of the Workgroup Report
- **Dec 2021 - Feb 2022:** The Workgroup discussed and considered the RFI responses and completed the Workgroup Report.

The Chair acknowledged that the Workgroup Report for IGT132VV is a lengthy document, noting that a significant amount of information had been added to the report in an effort to respond to Ofgem's questions. The Chair asked whether Panel members had the opportunity to read it. There were no issues raised by members with regards to this. A member asked about the size of the parties that responded to the RFI. The CA confirmed that it was a mixture of medium and large only, with no smaller parties engaging with the RFI. The Panel recognised the lack of representation from smaller Shippers and the balance of representatives in the Workgroup. The CA confirmed that this has been highlighted in the report and there have been recommendations from the Workgroup to Ofgem to seek information directly from smaller sized Shippers, especially where commercially sensitive information is required.

The Chair highlighted that the intention of IGT132VV is only applicable to transportation charges, noting that some Workgroup members felt that further clarity may be required with regards to this. The Panel accepted the approach proposed by the CA and CB (the Proposer) of raising a housekeeping Modification after the implementation of IGT132VV if further clarity is needed. The Proposer confirmed that they are happy to raise that housekeeping Modification if necessary.

JR expressed that the RFI generated a better and wider pool of responses than anticipated by the Workgroup and Panel and was a positive step towards answering Ofgem's questions. The Chair invited the Panel to consider if all the Ofgem questions from their [send back letter](#) had been answered and/or adequately addressed. The Panel unanimously agreed that the Workgroup had sufficiently addressed all the Ofgem questions either with observations or recommendations.

The Proposer questioned if the Modification needed to go out for consultation again, as it had already been out for consultation in January 2021 and there have been no amendments to the Modification (solution or legal text). The CA asserted that the consultation would give all parties the opportunity to review and comment on the RFI responses and Workgroup observations, particularly as there was a lack of representation from small Shippers throughout the whole RFI process. The CA also highlighted that it would be a good opportunity to remind parties that commercially sensitive information could be sent directly to Ofgem and to clarify that IGT132VV applies to transportation charges only. The Panel agreed that the consultation will demonstrate to Ofgem that all avenues have been exhausted in attempting to ascertain the information that they have requested, it also gives the whole of industry an opportunity to look at the report in its final and complete form.

The Panel unanimously agreed that IGT132VV should be sent out for consultation for a shortened period of two and half weeks, as the consultation is on the *report* and not the Modification itself. The Modification should return to the March Panel as a short notice paper.

The Panel agreed that the following points should be expressed when the consultation is issued:

- Views from smaller Shippers are specifically sought;
- Views on the RFI responses and observations are specifically sought;
- Additional confidential information could be forwarded to the CA or directly to Ofgem for consideration alongside the Modification; and
- IGT132VV is intended to apply to transportation charges only.

JR thanked the Prosper, for all the hard work and resilience shown with regards to IGT132VV.

## **6. [IGT158 - Transition to the Central Switching Service and the Retail Energy Code v3.0](#)**

The Chair gave a summary of IGT158, noting that the Modification details the transitional arrangements that will be required to the IGT UNC to implement the Central Switching Service (CSS) and transition to the Retail Energy Code version 3.0 (REC v3). IGT158 had been developed in parallel with the equivalent [UNC Modification 0784S](#).

The Chair informed the Panel that the UNC Panel approved UNC 0784S for implementation under Self-Governance rules. UNC 0784S is currently within its appeal window and is due to be

implemented on 11<sup>th</sup> March 2022, should no appeals be received. IGT158 points into the UNC's legal drafting, which contains a defined date in March as part of the implementation plan for the CSS. The same date is relevant to the IGT UNC transition text and, if implemented, the IGT UNC should attempt to implement IGT158 as soon as possible although post that date. The flight into the CSS implementation is already underway and the date for implementation is currently 18<sup>th</sup> July 2022.

CH highlighted that the Modification has been updated to indicate that the Shipper-Supplier Association Data (SSAD) requires the Shipper to define Authorised Suppliers where such Suppliers may nominate a Shipper in a CSS request and the Central Data Services Provider (CDSP) needs to receive the nominations from Shippers in advance of the CSS Implementation Date. However, the Modification remains silent with regards to the IGT transaction process.

HW asserted that it is likely that it does not have an effect on the IGT transaction process however they would need to obtain confirmation from Dave Addison (Xoserve). The Chair advised that this point was raised in a previous Workgroup meeting and that they were unsure if the IGT process is mentioned in the IGT UNC Code itself. The Modification addresses IGT governance but not necessarily the detail of related processes.

HW questioned whether there will be a period of time during the transition from UK Link to CSS where they will not be permitted to send the usual files, or files will be stacked up at the system end and they will not be processed as quickly. It was noted that Shippers have a cut-off point stipulated in the solution with regards their files. CH questioned if something similar would be applied to IGTs, this would help IGTs to manage validations dates and error messages generated on their systems. CH asserted that if the Modification was to go out to consultation as it stands, they would reject it as it is unclear what commitment is being made from an IGT perspective. It was agreed that IGT158 should be sent back to Workgroup to further consider the impact to IGTs.

The Chair and HW confirmed that they would raise the questions regarding IGT processes with Xoserve. The Chair notified the Panel that if there is an impact on the IGT transaction processes, it is highly likely that the IGT158 solution and the legal text will need to be amended.

The Panel agreed that IGT158 is time sensitive and that two Extraordinary IGT UNC Panel meetings (one pre-consultation and one post-consultation) should be held to speed up and facilitate the efficient delivery of the Modification. The Panel also agreed that as the transitional arrangements in the UNC have been fully considered under their Modification, a consultation period of two weeks would be sufficient and this would serve to bring forward the implementation date of IGT158. The Chair advised that as IGT158 points to the UNC 0784S legal drafting provisions it should be implemented after the UNC Modification if approved, which the Panel Accepted.

The Panel unanimously agreed that IGT158 should be returned to the March 2022 Workgroup to further consider impacts on IGT processes. The Panel also unanimously agreed that, following further Workgroup consideration, IGT158 should follow an expedited timetable.

The provisional timetable agreed by the Panel is as follows:

- **10<sup>th</sup> March 2022** - Workgroup reconsider IGT158, including additional information with regards to impacts on IGT processes and reviewing required amendments to the Modification and legal drafting (if required);
- **W/C 14<sup>th</sup> March 2022**- Extraordinary Panel meeting to consider updated Workgroup Report;
- **March - April 2022** - IGT158 issued for consultation for a period of two weeks; and
- **W/C 4<sup>th</sup> April 2022** - Extraordinary Panel meeting to consider Final Modification Report.

### **New Modifications**

#### **7. [IGT160 - Introducing the concept of a derogation into the IGT UNC for innovation projects](#)**

The Chair explained that IGT160 was raised on 16<sup>th</sup> February 2022, and that HW for Energy Assets Pipelines is the Proposer.

The Proposer explained that IGT160 is a replacement Modification for [IGT154 – Introducing the concept of a derogation into the IGT UNC for Net Zero innovation project](#) which was rejected by Ofgem on 21st January 2022. IGT160 aims to introduce the same solution as IGT154 but will address the points raised by Ofgem in their [decision letter for IGT154](#).

The Proposer took the Panel through a marked version of IGT160 highlighting changes between IGT160 and IGT154. There were two main changes:

- Increased clarity around the treatment of safety implications related to a derogation and the requirement that the Health and Safety Executive (HSE) approves any safety considerations and / or derogations prior to a Code derogation being sent to Ofgem; and
- A requirement that all derogations are decided on by Ofgem rather than the IGT UNC Panel.

The Proposer suggested that as IGT154 was considered in detail approximately one year ago, that the Workgroup focus on the areas of change introduced by IGT160, rather than viewing it as a completely new Modification. The Chair advised that the Workgroup would need to confirm that they are happy to lift the comments from the IGT154 Workgroup Report onto the IGT160 Workgroup Report for areas that have not changed and that is to ensure the debate is noted in the new Modification.

The Proposer confirmed that they will be attending the UNC Panel meeting for the equivalent Modification [UNC 0800 Introducing the concept of a derogation framework into Uniform Network Code \(UNC\) \(Authority Direction\)](#) and that they will be feeding this information back to the IGT UNC

Workgroup meeting on 10<sup>th</sup> March 2022. It is anticipated that legal drafting will need to be amended but not significantly.

The Panel unanimously agreed that IGT160 should be an Authority decision, that the Modification should be sent to Workgroup for one month and that IGT160 does not impact a current Significant Code Review (SCR).

### **Review Groups**

#### **8. [RG005 – IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements](#)**

The Chair notified the Panel that Ofgem have published their timetable and have indicated that most of the Codes will be raising their Modifications in February 2022. The UNC Modification [UNC0804 - Consequential UNC changes for Switching SCR \(REC 3.0\)](#) has been raised, it went to the UNC Panel in February and at that meeting Xoserve informed the Panel that the legal drafting had further amendments which has resulted in the Modification Consultation being delayed. The legal drafting will be updated and issued for consultation on the 4<sup>th</sup> March 2022.

The IGT UNC legal drafting has a significant number of UNC cross references and therefore the IGT UNC legal drafting will need to be updated based on changes made to UNC 0800. The changes being made under UNC 0800 are regarding Non-CSS supply points. This does not necessarily affect the IGT UNC text, but it will affect numbering within the IGT UNC. The Chair notified the Panel that they had reached out to Xoserve to ask that Dentons Solicitors, who are providing the UNC 0800 legal drafting, amend the UNC drafting with consideration for the IGT UNC's numbering and drafting implications.

The Chair informed the Panel that Ofgem have published the timetable for the IGT UNC SCR Modification Proposal:

- By **9<sup>th</sup> March 2022** - Draft SCR Modification Proposal issued to Ofgem for review;
- By **15<sup>th</sup> March 2022** - SCR Modification Proposal raised;
- **25<sup>th</sup> March 2022** - SCR Modification Proposal presented to Panel;
- **25<sup>th</sup> March 2022** - SCR Modification Proposal issued for consultation for a 4 week period; and
- **27<sup>th</sup> May 2022** - Final Modification Report considered by Panel.

The Chair indicated that this timetable would not allow for Workgroup and/or Panel to see the amended legal drafting prior to the Modification being raised. They noted that a marked version of the drafting between the last published version and that raised in the SCR Modification will be published on the IGT UNC website when the Modification is raised, providing parties an opportunity to see it before the consultation period begins. JS agreed to consult with the policy drivers at Ofgem to use

what influence Ofgem had to ensure that the UNC drafting is sympathetic to the needs of the IGT UNC.

The Chair also indicated that the purpose of the SCR Modification was to amend code specifically to introduce the CSS and RECV3 and nothing else beyond that. Any unintended consequences that may result due to the legal drafting could be reversed through a Modification post implementation.

The Panel unanimously agreed that as the amendments being made to the IGT UNC legal drafting is numbering only, it could be completed and published without further review by Workgroup or Panel members. The Panel also took into account that there would be a four week consultation period where the changes could be reviewed.

### **Authority Updates**

#### **9. Authority Updates**

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

### **AOB**

#### **10. [0799 - UNC arrangements for the H100 Fife project \(100% hydrogen\)](#)**

HW notified the Panel of UNC 0799 which was discussed at UNC Panel meeting in February and it was suggested that an IGT UNC equivalent Modification may need to be raised.

#### **11. [Statutory Consultation on licence changes for the Switching SCR: Standard conditions of Gas Shipper, Gas Transporter and Electricity Distribution licences](#)**

TL took the opportunity to highlight to Panel that Ofgem has issued a consultation on 17<sup>th</sup> February 2022 regarding licence changes for the Switching SCR. They noted that the consultation closes on 21<sup>st</sup> March 2022 and includes changes to both Gas Shipper and Gas Transporter licences.

#### **12. [IGT UNC February 2022 Release](#)**

TL notified the Panel that the IGT UNC February 2022 release had been delivered on 25<sup>th</sup> February 2022. No changes were made to the IGT UNC Code as part of that release and therefore version 13.7.1 remains in place. The February 2022 release only implemented changes to the [CSEP NExA Tables Ancillary Document](#), which has now been uplifted to version 1.7.

CH notified TL that they have experienced difficulties in finding the NExA tables between the period of agreement and the period of publication. TL acknowledged the feedback and agreed to look at how the tables could be highlighted to parties in a more effective way during this period

**The next IGT UNC Extraordinary Panel is scheduled for 14<sup>th</sup> March 2022.**

**The next IGT UNC Panel is scheduled for 25<sup>th</sup> March 2022.**

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Annex 1 – Actions Table

Reference	Date	Action	Owner	Status
21/10 – 03	29/10/2021	AJ to develop the Cross Code Ways of Working strawman and to bring back to Panel for review. The Panel agreed that this strawman should also include details of how Joint Workgroups would work.	AJ	Carried Forward – March 2022 update

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