

Extraordinary IGT UNC Modification Panel Meeting

Draft Minutes

Friday 1st April 2022

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Claire Roberts	CR	ScottishPower	Pipeline Users	
George Kestner	GK	Ofgem	Authority	
Jenny Rawlinson	JR	BUUK	Pipeline Operators	
Heather Ward	HW	Energy Assets	Pipeline Operators	
Kishan Nundoll	KN	Ofgem	Authority	Only present for Items 1-3
Talia Lattimore	TL	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 Sandra Fawzy (Gemserv), Jennifer Semple (Ofgem). Kishan Nundoll (KN) and George Kestner (GK) were confirmed as alternates and would be representing Ofgem.

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, to which no items were added.

Existing Modifications

3. [IGT161 - Consequential IGT UNC changes for Switching SCR \(REC 3.0\)](#)

The Chair provided an overview of the Modification, noting:

- IGT161 is the Faster Switching Significant Code Review (SCR) Modification for REC V3.0 and CSS implementation related changes;
- REC V3.0 will be implemented on 18th July 2022 and will coincide with the implementation of the CSS systems and REC version 3.0;
- The implementation of REC V3.0 will remove Shipper initiated switching out of the UNC and IGT UNC and add gas supplier initiated switching into the REC;

- IGT161 will remove switching provisions currently in the IGT UNC and the drafting largely continues pointing to the UNC and specifically to the drafting provided in the UNC equivalent Modification 0804 Consequential UNC changes for Switching SCR (REC 3.0)¹ to ensure the IGT UNC implements the same solution;
- The UNC0804 solution describes how the UK Link system will deal with switching and interact with the CSS, as developed by Xoserve; and
- The IGT UNC nuances (such as transporter initiated registrations) have been checked and will continue after implementation of the CSS and RECV3.0.

Governance & Consultation

The Chair advised the Panel that the work required for this Modification, including on the development of draft legal text changes, had been completed under RG005 - IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements² and Ofgem have directed that IGT161 be issued directly to consultation for a 4 week period. Following the close of the consultation, the Modification will be presented to Panel for recommendation and then submitted for Authority decision. The Chair asked if Panel members had any views regarding the governance for this Modification.

KN advised the Panel that the consultation for UNC0804 was due to end on 1st April 2022 and noted that it might be of benefit to IGTs to review the responses to this consultation as well as responses to other SCR Modification Consultations, referring to the Smart Energy Code (SEC) and Balancing and Settlement Code (BSC) changes. Other Panel members agreed with this may be useful to parties. KN added that they have asked the UNC Code Administrator to share responses to the UNC0804 consultation with the IGT UNC Code Administrator to ensure full visibility.

The Panel considered and discussed the length of consultation, noting that the Proposer had requested a 4 week consultation period ending on 29th April 2022. The Chair highlighted that due to the way the dates fall there will be two bank holidays within that period which means the number of working days will be reduced and that the Panel may want to consider an extension to the consultation period to account for these days.

HW asked if the intention was to bring the Modification back to Panel in May, which the Code Administrator confirmed was the case. HW responded noting that there would be no risk to missing the May Panel meeting because of a few days extension so said extension did not make a difference. JR agreed that an extension to account for the bank holidays would be desirable if there is no risk to the Modification being decided on at the May Panel. KN advised that the current timetable works but Ofgem are happy to extend the period if IGTs feel they need the additional days.

¹ [0804 - Consequential UNC changes for Switching SCR \(REC 3.0\)](#)

² [RG005 - IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements](#)

The Panel unanimously agreed that the consultation period should be extended to 5th May 2022, noting that should any issues arise as part of the consultation there should be ample time to address these and for these to be considered at the May 2022 Panel meeting.

Impacts

The Panel considered the impacts, and it was noted by the Chair that the wider Switching Programme will have benefits to consumers and that cross-code impacts have been called out in the Modification documentation and references to UNC0804 have been made. Ofgem added that the impacts are similar across all the SCR Modifications in terms of benefits and outcomes for consumers, noting that they are being mirrored or are exactly the same. The Panel had no comments or views with regards to impacts at this time.

Legal Drafting

The Panel considered the legal drafting, with JR advising that they had some challenges reviewing the UNC0804 drafting in terms of assessing the impact on the IGT UNC, specifically with regards to terminology changes. They noted that due to how the IGT UNC references terms and provisions in the UNC, it was difficult to see clear definitions for some of the terminology changes and in turn assess whether the changes were impacting, or whether they were simply a change in a defined term. The UNC has a defined list of terms, but the provisions need to be reviewed to see the definition. JR added that they asked the Joint Office for a list of terms and definitions but were unable to obtain one.

The Panel considered the approach to the IGT161 drafting in that the definitions are not in the IGT UNC but rather point to relevant definitions in the UNC, noting that this approach was taken to future proof the drafting. It was also considered whether a change in approach would be useful in that the definitions could be added into the IGT UNC directly. However, questions were raised about the impact to the timetable if such a change was made now. The Code Administrator confirmed that if a change in approach to defining terms was made now it would result in a delay in the progression of the Modification. However, a change could be made following the approval of IGT161 to bring the definitions into Code without impacting IGT161 progression. JR confirmed that this would be useful, noting that as the IGT UNC has become more complex it is getting harder to read the Code. There were no dissenting views from other members.

The Code Administrator agreed that it will look to obtain a list of terms and definitions and make this list available to parties as soon as possible, publishing it on the [IGT161 webpage](#) when available.

Implementation

The Panel considered the implementation approach. The Chair noted that the implementation for this Modification is targeted for 18th July 2022, asking Ofgem if there is anything that may impact that date. KN advised that there are checkpoints across multiple meetings, but everything is tracking as

expected and there are no anticipated impacts at this time. Panel members had no comments on the implementation approach.

The Chair noted that the June 2022 Scheduled Release is due to be implemented a couple of weeks prior to the implementation for IGT161. They advised that the Panel may want to consider combining these two releases at a future meeting given the scale of the change required for this Modification. The Panel had no comments on combining these two releases at this point in time.

Determinations

The Panel unanimously recommended that IGT161 be issued for consultation for a 4 week period, returning on 5th May 2022. They also recommend that parties consider responses to other SCR modification consultation when reviewing IGT161.

ACTION: Ex-22-04-01 - Code Administrator to obtain a list of terms and definitions and make this list available to parties as soon as possible, publishing it on the IGT161 webpage when available.

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

The Chair advised the Panel that IGT158 was re-considered by Workgroup following it being sent back from Panel. The consultation for this Modification closed on 28th March 2022 and responses were provided as a late paper ahead of this meeting.

Consultation

TL provided a summary of the consultation responses noting:

- Three responses had been received, all from IGTs;
- All respondents:
 - Supported the implementation of the Modification;
 - Agreed the Modification had a positive impact on Relevant Objectives D (Securing of effective competition) and F (Promotion of efficient in the implementation and administration of the Code); and
 - Agreed that the legal text delivered the intent of the Modifications solution.

TL also highlighted conflicting comments regarding impacts and implications for IGTs noting that one respondent felt the impacts and implications were still unclear and that this needed to be picked up. While another respondent (the proposer) felt that questions regarding impacts and implications had been answered and there were no impacts to IGT processes.

JR, who's organisation highlighted potential gaps, advised that their operational team at the time of the consultation felt that there was some missing information with regards to impacts on IGTs but that

they recognise that their issues with the approach are between them and Xoserve and that they have no issue supporting the implementation of this Modification.

HW added that it was their understanding following discussion with Xoserve at the last Workgroup meeting that there were no impacts on IGTs. JR added that the issue was more around the level of detail on a day to day level but they are engaged with Xoserve. CH advised that they pushed Dave Addison (Xoserve) on this matter at the meeting who insisted that there were no impacts on any IGT flows (inbound or outbound) during the transition period/system go live. The Chair confirmed that the meeting was supported by Mike Paley (Correla on behalf of Xoserve), who has a technical background, and both confirmed that there were no impacts.

The Panel unanimously agreed that no new issues had been raised and that there was no further work on IGT158 required by Workgroup.

Objectives

The Panel considered views put forward by the Proposal, Workgroup and consultation respondents with regards to the Relevant Objectives and agreed unanimously that IGT158 has a positive impact on Relevant Objectives (D) and (F) for the reasons given.

Implementation

The Panel considered the implementation approach and discussed the potential implementation date. The Chair advised that implementation would take place following the closure of the Appeal Window, that that relevant bank holidays would be considered.

The Panel queried the length of the Appeal Window, which was confirmed in the meeting to be 15 working days. The Panel unanimously agreed that IGT158 should be implemented immediately following the close of the Appeal Window and had no further comments on implementation.

Determinations

The Panel unanimously agreed that IGT158:

- continues to meet Self-Governance criteria and should be treated as a Self-Governance Modification Proposal, with a member noting that this is on the basis the transitional arrangements have no impact on IGT processes;
- needed no further work on the impacts as no new issues had been raised as part of consultation;
- should be implemented immediately following the close of the appeal window;
- legal text delivers the intent of the Modification; and
- should be implemented.

The meeting was then closed.

The next IGT UNC Panel meeting is scheduled for 29th April 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 – May 2022 update
22-03 - 01	25/03/2022	ACTION: Ex-22-03/ 01 CA to add clarification Modification to Known Issues register regarding IGT132VV applying to transportation charges only. CA to also include reference to said Modification in any subsequent approval and implementation notices for IGT132VV.	TL	Open

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