



**IGT UNC 22-05 Modification Workstream Meeting**

**Draft Minutes**

**Thursday 12<sup>th</sup> May 2022 via Teleconference**

<b>Attendee</b>	<b>Initial</b>	<b>Organisation</b>	<b>Notes</b>
Rachel Clarke	RC	Gemserv	Chair
Amie Lauper-Bull	ALB	Gemserv	Secretariat
Cara Keenan	CK	Last Mile	
Kundai Matiringe	KM	BUUK	
Cher Harris	CH	Indigo Pipelines	Joined at Agenda item 5
Michelle Brown	MB	Energy Assets	
Heather Ward	HW	Energy Assets	
Oorlagh Chapman	OC	Centrica	IGT 159 Proposer. Left the meeting after Agenda item 5.
Clare Manning	CM	E.ON	Joined at Agenda item 5
Emma Haxton	EH	Bulb	Left the meeting after Agenda item 5.
Claire Roberts	CR	ScottishPower	
Helen Bevan	HB	ScottishPower	Left the meeting after Agenda item 5.
Lee Greenwood	LG	British Gas	Left the meeting after Agenda item 5.
Graeme Cunningham	GC	British Gas	Left the meeting after Agenda item 5.
Martin Atwood	MA	Corella	Left the meeting after Agenda item 5.
Fiona Cottam	FC	Corella	Left the meeting after Agenda item 5.
Jamiee LeResche	JLR	Xoserve	
Ellie Rogers	ER	Xoserve	Left the meeting after Agenda item 5.

## 1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting and accepted apologies received from Anne Jackson (Gemserv), Talia Lattimore (Gemserv), Sandra Fawzy (Gemserv) and Gethyn Howard (Last Mile). All attendees confirmed permission for the meeting to be recorded.

## 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, which there were none.

## 3. Approval of the Previous Minutes 22-04

The Code Administrator (CA) informed the Workgroup that no comments were received for the draft 22-04 Modification Workstream meeting minutes prior to the meeting. The Workgroup had no comments to add to the Minutes at the meeting and they were approved as a true and accurate record of the meeting.

## 4. Outstanding Actions

The CA informed the Workgroup that there were five outstanding actions:

**22-03/ 01 IGTs and Shippers Workgroup representatives are to investigate if UNC Section M 5.10.6 is utilised by their organisation and to report on the frequency and details of that process. If the process is not used to provide reasons for that.** OC advised that it was not used in their organisation as the wording was not clear enough for people to utilise. HW also stated that they were unsure of the process. Xoserve confirmed that this process had not been used in the last 12 months. The Proposer noted that as the process was not clear in the UNC text there may be a need for a Modification to the UNC to address this, however this would not be included in the IGT Modification. The Chair advised that this action would be marked as closed.

**22-03/02 Workgroup representatives for IGTs and Shippers are to consider the definition of UNC Section M 5.10.6 and to consider any potential aspects that could be added for clarity or could make the Must Read process more efficient.** The Chair advised that Workgroup representatives for IGTs and Shippers considered a definition of UNC section M 5.10.6 and any potential aspects that could be added for clarity and to make the Must Read process more efficient. The Chair suggested that a UNC Modification could be raised to address this and advised that this action would be closed.

**22-03/03 ER and JL to confirm if the timeframe for the validation of Meter Reading applies to all parties in the same way with regards to submission deadlines.** This action was covered under Agenda item 5. Action closed.

**22-03/04 Workgroup representatives for IGTs and Shippers to familiarise themselves with Xoserve's Must Read training webpage.** The Workgroup agreed that they had familiarised themselves with Xoserve's Must Read training webpage. Action closed.

**22-03/05 Oorlagh Chapman (British Gas) to investigate why a Read is not valid after 25 days.** It was agreed that this action could be closed as it would be discussed under agenda item 5.

## 5. [IGT159 - Amendments to the Must Read Process](#)

The Chair advised that IGT159 had been raised in January 2022, with a further amendment made in February 2022. Originally the Modification had been submitted as Self-Governance, however the Panel had agreed that there would be potential impacts to consumers and therefore would need Authority Approval. The Chair noted that the purpose of the Modification is to update the Must Read process to:

- include timescales for a site to enter the process;
- introduce time frames for procuring and returning a Read to update reporting requirements and
- to ensure the most accurate information would be available to all industry parties.

The Chair added that the Modification sought to introduce or address five separate areas within the solution and all those areas would be looking to make changes to Part E of the IGT UNC.

It was noted that the Modification had been raised for several factors, one of which was the implementation of [UNC692s - Automatic Updates to Meter Read Frequency](#) that was implemented in January 2022. The Modification stated that it was expected that an additional 60,000 sites across the industry would enter the Must Read process because of UNC692. The Chair advised that the Proposer believes that the Modification would have a positive impact on relevant Objective D, which is the securing of effective competition.

The Chair advised that following discussion in the Workgroup, the legal text could be developed in June 2022 and the Workgroup Report could be completed and made available for the next Panel meeting following completion of the Workgroup report.

OC took the Workgroup through a presentation and advised that in the last meeting, the Workgroup had discussed the justifications for timescales in the Must Read process and noted that they had researched Xoserve's rules for Reads.

## **Rules for IGTs to provide Reads within an agreed window which allows the Shipper sufficient time to enter the Read into Settlement**

OC added that a reference to 'business days' needed to be included in the Modification to provide clarification on the timescales. To enable to process to complete, it had been agreed that 20 business days would be sufficient, and this would allow five business days for the Read to be validated by Xoserve. LG noted that the five business days would allow extra time to carry out the necessary investigation into a Read's validity and confirm with the Central Data Services Provider (CDSP) systems which would allow the Read to go through. There were no further concerns on timings, and it was agreed that the wording in the Modification should align with the wording in the Code.

The Chair enquired as to whether there would be an XRN change raised in order to make any amendments to central systems. ER agreed that an Xoserve change would be required as the Must Read process was done through the Contract Management System (CMS) system and the CMS was currently going through a rebuild. ER asked if there would be a hard rejection after 20 business days as there was an obligation for it to be processed for settlement purposes. OC stated that anything beyond the 20 business days would not have any applicable charges to the Shipper as the Shipper had attempted to submit a Read into central systems. ER asked if the Proposer had plans to put that requirement into Code. OC agreed, stating that it would not be acceptable to charge someone for exceeding the 20 business days if this timescale had not been written into Code. The Chair asked if, from a systems point of view, this would diverge how large sites would be treated compared to IGT sites. ER stated that currently there were differences between the scope of the two processes. MA agreed, stating that the standard validation Reads was what was written in the UNC, and if a Read was older than 25 business days then it would not be accepted.

CK asked for clarification on the deadline for submitting a Read once it had been obtained and if the Modification would include the time required to obtain the Read. CM stated that it had not been written into IGT159 and there were currently no plans to discuss it. The deadline was for submission of the Read and did not include a deadline for obtaining the Read.

HW suggested that it would be useful to work through some examples of rejections as a Read could have been taken in 'good faith' but be rejected. ER stated that the submitted Read would go through the standard Read validation and UKLink so there would likely be tolerance checks. ER added that this Modification is not seeking to add any additional rejection codes to those existing ones, therefore it would fall under the current list of possible rejection reasons. MA and CM agreed that there was a data quality issue with obtaining Reads. CR agreed, adding that if a Read had been submitted within 20 business days but then was rejected by the Shipper, then the Shipper should pay the charge.

FC advised that if the Read had not come from a Shipper, then it would not be validated, and the same asset and tolerance checks would be applied to protect the system from an erroneous number. The Read would have to be at least higher than the last Read and it would have to not generate a volume outside of the tolerances as per the UNC Meter Read Validation document.

**Reporting requirements to ensure that data is regularly refreshed and the most accurate and up to date information is available and used by all industry Parties**

OC advised that discussions had been held with Xoserve and Corella regarding the open reporting requirements to ensure that data is regularly refreshed, and the most accurate and up-to-date information is available and used by all industry parties. OC noted that it was about what was provided to IGTs and Shippers via CMS, including the prenotification, and the reports that were provided to IGTs. OC advised that there had been a data cleanse being carried out as part of the CMS rebuild which would help with data quality issues.

OC suggested that this should be a CDSP process rather than a Code obligation and the CMS team had confirmed that the Must Read process would be improved as part of the rebuild project and refreshing current data would also be part of the requirements to be built in. OC asked the Workgroup if they believed that it could be removed as a business rule. The Workgroup agreed with this approach. OC stated that this would be addressed in the CMS rebuild and everyone would have their working requirements via the data that would be provided in the CMS. CR agreed with this approach. The Chair asked what the timescales would be for the CMS rebuild. ER advised that some of the items were in change management stages and a first release was planned for the current quarter of 2022, however Must Reads were not included in this release. ER noted that it is likely the Must Read process would not be included until a further release in 2023. It was noted that the CMS rebuild team were going through a lot of planning activities and information would be shared with industry on the proposed release schedule for the rebuild program.

**A process for any faults or visible concerns with a meter, or issues obtaining a Read, to be recorded and reported**

OC suggested that there should be some supporting documentation to the Modification as it may not be appropriate to add this section into the Modification itself. OC noted that there had been a discussion with LG as to whether the fault flag stopped a site from entering the Must Read process and it had also been confirmed that if they removed smart meters with sites with an active DCC flag, then the volumes would be minimal. KM noted that an action had previously been taken to check whether fault notifications were being received and advised that BUUK would be clarifying what would happen to Reads with known issues and asked if they would advise the Shipper if there were any faults or visible concerns on the meters. LG advised that the Shipper would be notified through CMS. ER advised that there was a process by which they would have to suspend any forthcoming Reads with the fault flag if it had been put on the site by the Shipper. ER also suggested that a fault flag would be used primarily on larger sites or Class One sites, but this would need confirmation.

The Chair reminded parties that a guidance document sits outside of Code, whereas an Ancillary document sits under code and should be followed alongside Code obligations. Ancillary documents require a Modification to update it, however, guidance documents do not and can sometimes become outdated for this reason.

CM raised the issue of health and safety, stating that people should not be put in danger on sites that are not safe. OC advised that due to data protection regulations, they would have to be careful with how information would be recorded.

EH advised that previous data issues had involved lots of Reads that could not be validated because the previous Shipper Reads were incorrect but they could still fall into the Must Read process so an IGT could be sent out to get Reads for a site that has already recorded Reads. The Chair asked if a data cleanse would address this issue. CR and CM disagreed. EH stated that if Xoserve held a rejected Read then that would mean that Reads were being obtained from that site. CR suggested that a way forward would be to change the system and raise a change to the RGMA process. The Workgroup agreed with this approach. The Chair suggested that this topic would potentially involve a Review Group being raised in the UNC and would be out of scope for this Modification.

**A specific process for Smart and AMR meters with an active DCC flag**

HW enquired why sites were in the Must Read process if they had a valid active DCC flag. LG stated that for SMETS to be remotely triaged, the active DCC flag would have to stay in place. For a non-domestic site, it would need to be remotely fixed, and the active flag would need to be left in place so there could be a non-domestic site that shows as active but was in fact inactive. Once taken out of the active flag, it would not be possible to remotely triage and it would go back to a more manual process.

OC noted that they received information on customer dissatisfaction when meters had not communicated as the meters should provide Reads for them. LG advised that they would get notified through the DCC when Reads were not polling and that is when the remote triage process would begin.

FC raised a concern surrounding unidentified gas, stating that there was a potential for sites that had a Smart DCC flag on them, to be left and not fixed if taken out of the Must Read process. FC considered what the trigger would be to addressing non-communicating Smart Meters in the Modification. The Chair noted that the Performance Assurance Committee (PAC) should be informed of this topic and agreed to take it to the PAC for discussion.

**ACTION: 22-05/01 RC to inform PAC of the discussions held by the Workgroup on unidentified gas and issues around non-communicating Smart Meters being excluded from the Must Read process.**

**A specific process for sites gained via the SoLR process to allow shippers the new shipper the opportunity to obtain a Read**

OC noted that there would be a specific process for sites gained via the Supplier of Last Resort (SoLR) process to allow the new Shipper the opportunity to obtain a Read. OC stated that they would be extending the current agreed process to be an enduring solution and there would be a confirmation of standard process for Change of Supplier (COS). OC noted that there would be a four-month pause on all sites for SoLR and COS. HW challenged whether four months for COS was necessary and advised that more detail might be needed. OC advised that they would revise the wording.

GC asked what would happen to the Must Read process once Faster Switching had been implemented as technically a customer would be able to switch as often as they wanted. CM suggested that if the Reads weren't being received then it should be taken to PAC. GC stated that if

an account was taken over from a supplier and they only had five days to submit the Read then they potentially would not have time to bill for it and this could lead to customers switching more frequently to avoid paying their bills. OC advised that, when a Must Read is raised within the time frame that was valid on the pre-notifications then the charge would be whatever had been flagged at that point with the old supplier.

MB suggested that the rule should specify that after three or four months then the timescales should return to zero and this would allow the new Shipper the full amount of time to obtain a Read. FC advised that it was currently set to four months and it was switch-agnostic. OC agreed to approach the Faster Switching team to find out if there would be any mitigations in place for customers switching.

**ACTION: 22-05/02 OC to approach the Faster Switching Team to find out if there are any mitigations in place for customers switching frequently under the new regime and the impact that may have on settlement.**

OC stated that the five business rules would be sent to Xoserve to be ratified with the view of having an amended Modification and Final Modification Report ready for June 2022. The Chair noted that, with a four-day bank holiday in June 2022, the paper day for the next Workgroup meeting would be 1<sup>st</sup> June 2022 and the Workgroup would need to see the amended Modification before the legal text could be drafted. ER also added that following implementation of the IGT UNC Modification an XRN would need to be raised for the system changes and this would need to be considered when expecting this Modification to be operational. .

**AOB item - Extension to the current Must Read pause for IGT sites**

Shippers enquired whether IGTs would consider a further two month extension to the current IGT Must Read pause which was due to expire at the end of May 2022. CR noted that the extension was needed as the Modification timescales had slipped and there was potential for a large number of Must Reads to enter the process due to UNC692S following the end of the May 2022 pause. The Chair suggested that a member of the Workgroup attend the next meeting of the Independent Network Association (INA) Regulatory Sub-committee to continue the discussion. IGTs queried whether this would be the last request of this nature of due to the unknown implementation timescales of the Modification and the system change, whether this would be caveated with a possible future request. CR noted that that may be a possibility, however, the current request was for two months.

The Chair discussed the timescales for the future of the Modification and noted that as this was an Authority Decision, the timescales are unknown passed the Panel's recommendation.

The Chair suggested that an excerpt of the minutes from this meeting be included in the meeting papers for the next INA meeting to make all IGTs aware of the discussions held.

The Chair asked what would trigger raising a change through Xoserve. ER stated that anyone had the ability to raise a change proposal and Xoserve would provide support throughout the process. The



Chair then asked the Shippers in the Workgroup if their position was that they were still happy with the timescale of two months with the caveat that there may be a further request in future. CR agreed and EH stated that they did not want the pause to go on any longer than necessary. The Chair noted that the longer the Reads are static, the greater the risk. OC suggested that if a resolution could not be reached then there should be a caveat that the site would automatically fall back.

The Chair noted that the Code Administrator would inform the Authority that there were time sensitivities associated with the Modification and encouraged the Workgroup to note this in their consultation responses.

## 6. [Cross-Code Modification Implications Tracker](#)

ALB took the workgroup through the Cross-Code Modification Tracker and the following Modifications were highlighted:

[IGT158 - Transition to the Central Switching Service and the Retail Energy Code v3.0](#) – it was noted that this Modification had been implemented on 27<sup>th</sup> April 2022 following the closure of the Appeal window.

[IGT138V - Performance Assurance Techniques and Controls](#) – the UNC equivalent Modification, UNC674, was issued for industry consultation on 22<sup>nd</sup> April 2022 for 20 working days. Responses are due on 20<sup>th</sup> May 2022. UNC0674 is due to go back to UNC Panel in June.

IGT138 was presented to Panel on 29<sup>th</sup> April. The Panel accepted the variation request and IGT138V was issued for consultation on 29<sup>th</sup> April 2022 for 3 weeks with responses due back by 23<sup>rd</sup> May 2022. IGT138V will be added to the June Workgroup meeting agenda as an AOB item (at the request of Panel) to ensure that any issues that arise from either consultation can be considered and discussed ahead of the June IGT UNC Panel meeting.

[IGT161 - Consequential UNC changes for Switching SCR \(REC 3.0\)](#) – The Modification had been issued for a 4-week consultation, with a close out date of 5<sup>th</sup> May.

MB noted that the UNC had drafted a Modification for gas vacant sites and queried whether a mirror Modification should be drafted under the IGT UNC. CM suggested that it may involve system changes and there would be long term processes based on the charges to be applied. The Chair advised that they liaise with colleagues and return with further information at the next workgroup meeting.

## 7. [IGT UNC Known Issues Register](#)

ALB took the Workgroup through the Known Issues Register noting and update had been given to the following issue:



“Performance Assurance changes in the UNC not being picked up and replicated in the IGT UNC, therefore, leaving the codes misaligned.” – It was noted that the IGT138 had been considered by the Workgroup and a variation request had been presented to Panel at its April 2022 meeting where the Panel agreed to accept the variation and issue the Modification for consultation for 2.5 weeks.

The Workgroup agreed that the Must Read Issue should be added to the Known Issues Register. This was in respect of the current pause and request for an additional two months as discussed in agenda item 5.

**ACTION: 22-05/03 Add Must Read issue (IGT159) to Known Issues Register**

**AOB**

**8. Extension to the current Must Read pause for IGT sites**

This item of AOB was covered under the discussion for IGT159.

**9. Update on asset transfers from Fulcrum Pipelines Ltd to ES Pipelines Ltd**

The Chair advised that the latest update on the asset transfer from Fulcrum to ES Pipelines had been issued on behalf of Fulcrum from IGT UNC mailbox on 27<sup>th</sup> April 2022.

It was noted that the transfer was due to take place in the system on 1<sup>st</sup> June 2022 and a provisional list of MPRNs had been given to the Code Administrator, but they were waiting on the final list to be provided. The Chair noted that there was no expected date for the final list, but once it had been provided then the MPRN ranges would be shared. The Chair added that they were expecting this to be the last asset transfer, but if this changed then industry would be informed.

**10. Government responses to consultations: [Energy Code Reform](#) / [Future System Operator](#)**

**Energy Code Reform:**

It was noted that Ofgem would be taking on the role of new Strategic Body (SB) and Code Managers would be licenced and appointed by SB. The Codes in scope of the reform would include the current 10 industry Codes and primary and secondary legalisation would be required. The legislation would be progressed when parliamentary time allowed the Government to start working on areas that do not require legislation, including the framework for Code Manager licence.

The Chair noted that an open letter was to be expected in late Summer 2022, which would set out next steps for the Energy Code Reform, including further detail on Code consolidation, upcoming opportunities for industry engagement and a transitional approach to implementing reform starting

with legislation. This would be followed by Code consolidation and then the appointment of Code managers (both of which would happen on a Code-by-Code basis).

#### Future System Operator (FSO):

The Chair advised that the Government and Ofgem were committing to proceed with the creation of a new, independent FSO broadly on the lines proposed in the consultation document. The FSO would have a statutory advisory duty to provide expert advice, analysis and information to Ofgem and government. It was noted that the FSO would take an increasingly significant role in shaping the energy system and driving forward competition and would hold statutory powers to request information and data from other licensees. The FSO would take on all the main existing roles and responsibilities of National Grid Electricity System Operator (NGESO) and the longer-term planning, forecasting and market strategy functions in respect of gas (but not real-time gas system operation or Network Emergency Coordinator functions).

The Chair advised that a consultation was issued on the ownership of Elexon and most responses agreed with the proposal and approach.

The FSO would bring in new and updated licencing arrangements, as well as amendments to industry Codes. It would also need to address both the mechanisms necessary to ensure smooth transition and the enduring arrangements for FSO. Finally, the Chair advised that the FSO could be established by 2024.

#### **11. Ofgem open letter on the Recovery by Transporters of Last Resort Supply Payments**

The Chair informed the workgroup that Ofgem had issued an open letter on 20<sup>th</sup> April 2022, which related to the recovery of Last Resort Supply Payment (LRSP) claims arising from failed energy retail suppliers going through the Supplier of Last Resort (SoLR) process.

It was noted that Ofgem would be consulting on options for the recovery of LRSP claims from domestic gas customers connected directly to Gas Distribution Networks (GDNs) and those connected via Independent Gas Transporters (IGTs).

The Chair advised that responses to the open letter are invited by 18<sup>th</sup> May 2022.

#### **12. Further AOB**

CR asked if there was one location where the IGT Transportational Charges could be found. CH advised that each IGT published their own statements based off a central methodology which is available on the Ofgem website. It was agreed that each individual IGT should be approached for specific details on their Transportation Charges.

The next Workgroup meeting is scheduled for Thursday 9<sup>th</sup> June 2022.

**Annex A – Action Log**

Action reference	Action Description	Owner	Status
WS 22-03/ 01	Workgroup representatives for IGTs and Shippers are to investigate if UNC Section M 5.10.6 is utilised by their organisation and to report on the frequency and details of that process. If the process is not used to provide reasons for that.	IGTs and Shippers	Closed
WS 22-03/02	Workgroup representatives for IGTs and Shippers are to consider the definition of UNC Section M 5.10.6 and to consider any potential aspects that could be added for clarity or could make the Must Read process more efficient.	IGTs and Shippers	Closed
WS 22-03/3	ER and JL to confirm if the timeframe for the validation of Meter Reading applies to all parties in the same way with regards to submission deadlines.	ER and JL	Closed
WS 22-03/4	Workgroup representatives for IGTs and Shippers to familiarise themselves with Xoserve’s Must Read training webpage.	IGTs and Shippers	Closed
WS 22-03/5	OC to investigate why a Read is not valid after 25 days.	OC	Closed
WS22-05/01	RC to inform PAC of the discussions held by the Workgroup on unidentified gas and issues around non-communicating Smart Meters being excluded from the Must Read process	CA	New
WS22-05/02	OC to approach the Faster Switching Team to find out if there are any mitigations in place for customers switching frequently under the new regime and the impact that may have on settlement.	OC	New
WS22-05/03	Add Must Read issue (IGT159) to Known Issues Register	CA	New