

**IGT UNC Modification Panel Meeting**

**Draft Minutes**

**Friday 27<sup>th</sup> May 2022**

**Via teleconference**

<b>Attendee</b>	<b>Initials</b>	<b>Organisation</b>	<b>Representing</b>	<b>Notes</b>
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Claire Roberts	CR	Scottish Power	Pipeline Users	
Heather Ward	HW	Energy Assets	Pipeline Operators	IGT160 Proposer
Jenny Rawlinson	JR	BUUK	Pipeline Operators	
Jennifer Semple	JS	Ofgem	Authority	
Richard Pomroy	RP	Wales and West Utilities	Observer	Distribution Network (DN)
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 had opened a meeting prior to this and held that open for one hour as per Code rules (Part L6.10). There were no apologies received.

**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, but there were no further items added.

**3. Approval of the previous minutes (22-04 and 22-04 Reconvened)**

The Code Administrator (CA) invited comments on the April 2022 meeting 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 was one outstanding action:

- **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.** AJ explained to the Panel that this action is to be carried over to the July 2022 Panel meeting. RP informed the Panel that progress on this action to date had been communicated to the Joint Office. It was agreed that AJ would speak to the Joint Office regarding this action point.

## **Existing Modifications**

### **5. IGT160 - Introducing the concept of a derogation into the IGT UNC for innovation projects**

The Chair reminded Panel that IGT160 stems from the earlier Modification [IGT154 – Introducing the concept of a derogation into the IGT UNC for Net Zero innovation project](#) and the UNC equivalent Modification [UNC0760 - Introducing the concept of a derogation framework into Uniform Network Code \(UNC\)](#), both which were rejected by Ofgem in January 2022. The Proposers subsequently raised IGT160 and the UNC equivalent Modification [UNC0800 - Introducing the concept of a derogation framework into Uniform Network Code \(UNC\) \(Authority Direction\)](#) which looked to introduce the same solutions but also addressed the comments and concerns raised by Ofgem.

The Chair advised Panel that UNC0800 is running ahead of IGT160 with regards to the Modification process. The UNC Panel, at its April 2022 meeting, recommended to Ofgem that UNC0800 be implemented and Ofgem's decision is due on 27<sup>th</sup> May 2022, therefore the Modifications will not be considered jointly as it was originally planned. The IGT UNC Panel, at the March 2022 meeting, decided IGT160 should be returned to Workgroup for further work in April. The Modification has since been returned to Panel and issued for consultation, which closed on 18<sup>th</sup> May 2022.

TL took the Panel through the consultation responses. There were three responses, two were received from IGTs and one was received from a Distribution Network (DN). All three respondents supported the implementation of the Modification and that it should be treated as an Authority decision Modification.

TL explained to the Panel that one of the respondents replied to the consultation with a written letter in full support of the Modification but did not address each point individually (i.e., objectives, legal text and implementation etc.). Two respondents agreed that:

- IGT160 would have a positive impact on Objective B (Co-ordination, efficient and economic operation of the pipeline system) and Objective F (Promotion of efficiency in the implementation and administrator of the Code);
- the legal text delivers the intent of the Modification; and
- IGT160 should be implemented in the next available IGT UNC release following an Authority decision.

TL reminded the Panel that both UNC0800 and IGT160 intend to introduce derogations into the IGT UNC and the UNC, however unlike many IGT UNC Modifications where the IGT UNC cross references a solution or framework so that it is pointing into the UNC, IGT160 has its own solution and stands alone. Therefore, although the UNC equivalent Modification is aligned, they are separate solutions and can be implemented on different dates.

The Panel had no further comments to make regarding the Final Modification Report. The Panel unanimously agreed that:

- no further work was required by the Workgroup on this Modification;
- IGT160 has a positive impact on Relevant Objectives (B) and (F) for the reasons provided by the Proposer and the Workgroup;
- the legal text delivers the intent of the Modification; and
- IGT160 should be recommended to the Authority for implementation.

*Post Meeting Note: Ofgem's decision to implement UNC0800 was published on 30<sup>th</sup> May 2022. A copy of the Ofgem decision letter can be found on the [UNC0800 webpage](#).*

#### **6. IGT161 – Consequential IGT UNC changes for Switching SCR (REC 3.0)**

The Chair reminded the Panel that IGT161 is a Significant Code Review (SCR) Modification which has been raised by the Authority and by default requires an Authority decision. The Chair informed the Panel that the equivalent SCR Modifications have already been accepted by Ofgem, including the UNC equivalent Modification [UNC0804 - Consequential UNC changes for Switching SCR \(REC 3.0\)](#). The solution in IGT161 points into the UNC0804 solution which aims to implement the necessary changes to facilitate the successful delivery of the Central Switching Service (CSS).

The Chair highlighted to the Panel that there was minimal feedback on the legal drafting for both UNC0804 and IGT161, which means there is a potential risk of errors not having been picked up. The mitigation for any missed errors being picked up has already been discussed with the Panel, which would be to use the Fast-Track Modifications Process to deliver any changes that need to be made.

TL took the Panel through the consultation responses. There were three responses to the IGT161 consultation, all of which were received from IGTs. All respondents:

- supported the implementation of the Modification;
- agreed that it should be treated as an Authority decision;
- agreed that the legal text delivers the intent of the Modification;
- agreed that IGT161 would have a positive impact on Objective D (Securing of effective competition) and Objective F (Promotion of efficiency in the implementation and administration of the Code), with one respondent also felt that the Modification would have a positive impact on Objective C (Efficient discharge of the licensee's obligations);
- agreed with the implementation approach; and
- agreed that IGT161 should be implemented on the CSS go live date, currently expected to be 18<sup>th</sup> July 2022.

TL explained that one respondent commented with regards to terminology mapping, noting that the respondent said it would be appreciated if guidance documents could be provided to support cross

code navigation. The CA are aware that it has been challenging to review the legal text in terms of assessing the impact on IGT UNC, specifically with regards to the terminology changes. This had been raised in a previous Panel meeting and resulted in the CA discussing the matter with Xoserve who produced a document to assist with the review of changes to terminology. This document was published on the Modification [webpage](#) on 27<sup>th</sup> April 2022.

The Panel considered the views expressed by the consultation respondents and agreed that no new issues had been raised and that no further work was required.

The Panel unanimously agreed that:

- IGT161 should proceed to the Authority for decision;
- the legal text delivers the intent of the Modification; and
- IGT161 has a positive impact on relevant Objectives C (Efficient discharge of the licensee's obligations), D (Securing of effective competition) and F (Promotion of efficiency in the implementation and administration of the Code) for the reasons provided by the Proposer.

The Panel unanimously voted to recommend to the Authority that Modification IGT161 should be implemented.

### **Update on Workgroups**

#### **7. [Workgroup Summary](#)**

##### **IGT159 – Amendments to the Must Read Process**

The Panel requested an update from a recent Independent Network Association (INA) Regulatory Sub-committee meeting with regards to the IGT discussions regarding the '*Must Read pause*'.

TL informed the Panel that at the May 2022 Workgroup meeting Shippers enquired as to whether IGTs would consider a two month extension to the current IGT Must Read *pause*, which was due to expire at the end of May 2022.

It was noted that the extension was needed as the delivery timescales had slipped for [UNC0692S - Automatic updates to Meter Read Frequency](#) and there was potential for a large number of Must Reads to be triggered at the end of May 2022, when the pause was due to be lifted.

At the May 2022 Workgroup the Chair suggested that the IGTs attend the next INA Regulatory Sub-committee meeting to continue the discussion that had taken place in the Workgroup. JR was present at the meeting and notified the Panel that the pause period should last until the end of July 2022. TL predicted that the earliest date for IGT159 to be returned to Panel would be at the end of July 2022 meeting, although this depended on the outcome of the Workgroup meeting in June. It was also noted

that IGT159 is an Authority decision Modification which means a decision may not be seen for some time.

A revised Modification for IGT159 is anticipated to address matters raised in the May 2022 Workgroup meeting. The Panel were advised to read the draft [May 2022 Workgroup Minutes](#) for details of those anticipated changes. The CA confirmed that they have not yet received a draft of the amended Modification Proposal but that this is expected to be provided ahead of the June 2022 Workgroup Meeting.

### **Authority Updates**

#### **8. Authority Updates**

JS informed the Panel that Ofgem will not be conducting the Code Administrator Performance survey for the upcoming year, as they are reviewing how the survey fits alongside Ofgem's code reform plans. JS confirmed that IGTs could be informed of this.

### **AOB**

#### **9. Proposed change to June 2022 Release Date**

The Chair notified the Panel that there are currently no Modifications due to be implemented in the standard IGT UNC June Release. However, it is anticipated that IGT161 (see item 6 above) will be released on 18<sup>th</sup> July 2022.

The Chair notified the Panel that there are two options open to the IGT UNC, the first is to delay the June 2022 Release date until the 18<sup>th</sup> of July 2022 and the second option is to keep the standard June Release in place (with no Modifications to implement) and have an Extraordinary Release date on 18<sup>th</sup> July 2022 to implement IGT161. The Chair notified the Panel that there is a subtle difference in both options and thus far, no preferences have been expressed.

TL highlighted that there may be a potential risk in delaying the June Release date until 18<sup>th</sup> July as an unanticipated delay may occur regarding the implementation of IGT161 as it is dependent on the CSS go live date and therefore the June Release date could be pushed back even further than the 18<sup>th</sup> of July.

The Chair noted that a potential positive of not delaying the June release is that it allows another Modification to be implemented as part of the scheduled release should a decision be made ahead of 18<sup>th</sup> July 2022 (e.g. [IGT132VV – Introduction of IGT Code Credit Rules](#)).

The Panel had a brief discussion regarding the interpretation of Part L Section 27.2 of the IGT UNC; Modification Proposal Implementation. The CA and Panel agreed to consider the implementation rules in more detail and assess if they are adequate and aligned with other Code rules. It was agreed

that Part L Section 27.2 of the IGT UNC will be on the agenda and considered in more detail at the June 2022 Panel meeting.

The Panel agreed that the standard June Release date should stand and that there should be an Extraordinary Release on 18<sup>th</sup> of July to implement IGT161.

**ACTION: WS 22-05/1 CA to consider the interpretation of Part L Section 27.2 of the IGT UNC and to list for discussion at the June 2022 Panel meeting.**

**The next IGT UNC Panel meeting is scheduled for 29<sup>th</sup> June 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 – July 2022 update
22/05 -01	27/05/2022	CA to consider the interpretation of Part L Section 27.2 of the IGT UNC and to list for discussion at the June 2022 Panel meeting.	CA	New

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