

IGT UNC Modification Panel Meeting

Draft Minutes

Friday 26th August 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	Scottish Power	Pipeline Users	
Heather Ward	HW	Energy Assets	Pipeline Operators	
Jenny Rawlinson	JR	BUUK	Pipeline Operators	
Jennifer Semple	JS	Ofgem	Authority	
Stuart Monk	SM	Mua Group	Observer	
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 (CA) 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. SM added item 11 – Panel membership update and JS added item 8 – Code Reform Update.

3. Approval of the previous minutes (22-07 and 22-07 Reconvened)

The CA invited comments on the July 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 were 2 outstanding actions:

- **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 advised the Panel that this action has been carried over to the September 2022 Panel meeting noted that this may not be achievable but that they would keep the Panel informed of any progress.

- **22/07 – 01: JS is to update the Panel at the next Panel meeting with regards to the expected decision date for IGT132VV.** JS informed the Panel that Ofgem are expecting to publish a decision at the end of September 2022. This action was closed.

Modification Business

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

The Chair advised the Workgroup that work had been concluded on IGT159 and that the Panel would be considering the Workgroup Report and next steps for the Modification.

TL provided the Panel with an overview of the Modification, which was focused on the Solution and Business Rules as set out in the Workgroup Report. TL invited comments and questions from the Panel.

Exclusion of sites with known issues

JR confirmed that they were happy with the Workgroup Report, noting that the Workgroup seemed to be conclusive about the Modification. However, they did wish to raise a question regarding the Legal Text. HW advised that Part E, paragraph 11.4 of the Legal Text indicates that where a site has a known issue preventing a read from being obtained, and this has been notified to the CDSP, an IGT should not collect a read. If they did collect a read the Shipper is not obligated to pay for it. They added that paragraph 11.5 requires the CDSP to notify a Shipper where an IGT has identified a known issue. However, there is no reciprocal provisions for the CDSP to notify an IGT where a Shipper has identified a known issue. HW questioned how an IGT would know about a known issue if they are not notified. Adding that if an IGT is unaware of a known issue and visits the site to get a read, they will be unable to recover costs for the visit as technically the site will have a known issue associated with it.

JR echoed the views noting there could be many instances where they may look to get a read but then would not get funding back under the provisions due to the way the governance is framed at the moment.

TL referenced discussions had by the Workgroup where it was agreed that the CDSP would remove a site from the final notification report once they have been advised of a known issue. This means that a site should not be listed in the final notification report and the IGT will not attempt a visit. They added that the Workgroup also considered what would happen if an IGT visited a site and was unaware of a known issue. IGTs in the Workgroup advised that they would look to charge Shippers for the visit where the issue became apparent but would then cease any further visits until told otherwise. The Workgroup had no issue with this approach at the time.

The Chair asked how the notification reports work and whether these are issued monthly and are refreshed. HW advised that in the future there will be a monthly report, which will be delivered as part of the CMS rebuild, but at the moment the IGT may not know of a site having a known issue.

JR suggested considering sending the Modification back to Workgroup with a request for the Workgroup to consider updates to the solution and Legal Drafting to firm up the governance, adding that this is something they would like to see added.

The Panel considered whether the concerns raised were the result of a misalignment between the Business Rules, solution and Legal Drafting. TL took the Panel through relevant areas of the solution, Business Rules and Workgroup discussions, reiterating previously noted decisions and views regarding the notification reports and the removal of sites with known issues. CR (who also took part in the Workgroup meetings) advised that as sites with known issues were going to be dealt with early and removed from the notification reports, that further notification to the IGT was not seen as necessary.

JR responded, recognising the views of the Workgroup and the intent of the solution, but had concerns regarding the governance, adding that they understood how it was anticipated to work operationally. However, due to the way the Business Rules are worded, and therefore the Legal Text, the Code would not allow for the IGT to collect a read or charge for a read if there is a known meter issue associated with the site. They felt that the governance did not match the intent of the Modification. Other Panel members felt that the solution, Business Rules and Legal Drafting were aligned.

TL asked Panel members if there is a standard cut off point that Shippers will be aware of for the notification reports. CR advised that there is a monthly cut off point to encourage reads being obtained within the pre-notification portion of the process. They added that in the current system, up to date data and data refreshing is an issue but in the future, this should not be an issue as there will be monthly reports and more accurate data as part of the CMS rebuild. TL added that early requirements discussed at Workgroup included data refresh provisions but that these were removed from the Modification as a result of this issue being addressed as part of the CMS rebuild.

References to UNC Provisions

JR raised a question with regards to Part E, paragraph 11.1, which makes reference to paragraph 5.10.3 of Section M of the UNC. They highlighted that the context that currently sits in the UNC and leads to points (a) and (b) currently within 5.10.3 has not been included within the drafting and therefore there is a risk of said context being fully replaced and therefore lost. The Chair acknowledged the point and advised that the legal drafting would be updated to ensure the relevant UNC context is not lost.

JR also highlighted that the use of “replaced” within the legal drafting was not entirely clear. The Code Administrator clarified that the use of “replaced” was to indicate to the reader that provisions within the UNC legal text would be replaced by provisions provided in the IGT UNC and in this case from within the IGT159 legal text (i.e. they are different to provisions currently within the UNC). The Chair advised that they would amend the Legal Drafting to make this clearer.

JR asked for clarification on whether the surrounding text in the document was supportive or part of Code. TL clarified that all of the text in the document, apart from the cover page, is either existing Code or new provisions to be included in Code. The black text is existing IGT UNC text, the red text is new text that is unique to the IGT UNC and the blue text is UNC provisions that have been pulled out into the IGT UNC and also amended to meet the intent of IGT159.

Conclusion

The Panel considered whether the Modification should be sent back to the Workgroup or issued to Consultation.

HW advised that they supported issuing the Modification to consultation now and seeking views on the concerns highlighted during the meeting. This is because if the Modification went back to the Workgroup to discuss the potential reciprocal provisions, and the Proposer or Workgroup Members disagreed, it will simply go back to Panel and out for consultation causing unnecessary delay. Other members also supported issuing the Modification to Consultation and agreed that there was no misalignment between the solution and the Legal Drafting.

JR advised that they supported issuing the Modification back to the Workgroup as they felt that the governance in Code did not meet the intent of the Modification.

The Panel agreed by majority that the legal text aligns to, and delivers, the intent of the solution and the Business Rules. As a result, the Panel agreed by majority that the Modification should be issued for consultation (rather than being sent back to the Workgroup).

TL advised the Panel that they can add an additional question / area of consideration, which Parties can provide views on. The Panel agreed that an addition point of consideration should be included as part of the consultation so that views from industry can be sought on whether there should be a reciprocal arrangement added into the Business Rules, and therefore the legal drafting, for the CDSP to notify an IGT where a Shipper has made known an issue.

CH requested that the Code Administrator liaise with the Proposer regarding the IGT159 Panel discussions and ensure they are aware of the concerns raised and they receive the formal consultation email.

Action 22/08 – 01: CA to liaise with Proposer regarding IGT159 Panel discussions and ensure they receive the formal consultation email.

The Panel reviewed the Workgroup Report in its entirety had no further comments on the Modification.

Authority Updates

6. Authority Updates

JS updated the Panel on Energy Code Reform advising that Ofgem intend to publish a call for input at the end of September / early October 2022. This call for input will be seeking views regarding Code Consolidation, Code Manager Licence Conditions and Stakeholder Advisory Forums. They will also be providing information on the implementation approach.

JS added that Ofgem met with Code Chairs in August 2022 and will continue to engage through the duration of Energy Code Reform. The Chair advised that they were unable to attend the session with Chairs in August was therefore unable to contribute.

7. Ofgem's Expected Decision Dates

The Panel were directed to Ofgem's latest Expected Decision Dates which were published on 22nd July 2022, which has not been updated since the last Panel meeting.

- [IGT132VV – Introduction of IGT Code Credit Rules](#)
 - JS informed the Workgroup that a decision is expected to be published by the end of September 2022.

AOB

8. Code Reform Update

This item was discussed as part of item 6. Please see item 6 for details.

9. IGT UNC standard Release date and Extraordinary Release date – November 2022

The Chair advised the Panel that [IGT138V – 'Performance Assurance Techniques and Controls'](#) was approved by the Authority in July 2022 with a designated implementation date of 1st November 2022.

The Chair advised that [IGT160 - Introducing the concept of a derogation into the IGT UNC for innovation projects](#) is currently scheduled for implementation on 4th November 2022 as part of the November 2022 Scheduled Release.

The Chair suggested to the Panel that consideration be given to changing the Release Date for the November 2022 Schedule Release. They added that there are no related system changes expected for IGT160 and IGT138V and they are unaware of any reason why the release dates for the two modifications be made the same.

TL added that aligning to a single Release Date will reduce the amount of administration effort required by the Code Administrator as there are only a few days between the two dates. The Chair added that aligning to a single Release Date would also limit any party confusion as there will only be one release of code rather than two. TL suggested issuing formal communications to industry to notify them of the minded to decision and ask for views and any possible unintended consequences or questions to be raised to ensure that there are no surprises.

Panel unanimously agreed that aligning to a single Release Date of 1st November 2022 would be a pragmatic approach, allowing for efficiencies and mitigate the risk of party confusion. They also agreed that formal communications should be issued to parties to allow for views to be sought. Views will be considered at the September Panel meeting where Panel will make a final decision on the November 2022 Release Date.

Action 22/08 – 02: CA to seek views from industry regarding a potential change to the November 2022 Release Date.

10. Performance Assurance Industry Engagement Session – 21st September 2022

The Chair advised the Panel that an industry engagement session on Performance Assurance is being held on 21st September 2022 and that formal communications were issued by the Joint Office on 17th August 2022.

The Chair noted that the aim of the session is to provide an opportunity for parties to engage with members of the Performance Assurance Committee (PAC), gain an insight into what will be coming with the implementation of [UNC674V - Performance Assurance Techniques and Controls](#) and IGT138V and provide feedback on the application of Performance Assurance.

TL advised the Panel that parties can register by emailing PAFA@gemserv.com. Alternatively, parties can also email the Code Administrator and requests to register can be passed onto to the Performance Assurance Framework Administrator (PAFA).

11. Panel Membership Update

The Chair informed the Panel that this will be HW's last meeting and their time on the Panel will end on 31st August 2022.

The Chair and Panel thanked HW for their time and service on the IGT UNC Modification Panel and welcomed Stuart Monk (MUA Group), who will be taking HW's place on the Panel from 1st September 2022, following a decision by the Independent Networks Association (INA).

12. [RG005 – IGT UNC Review on Impacts resulting from the Faster Switching Programme arrangements & Ofgem Faster Switching Programme Update](#)

The Chair notified the Panel that RG005 was set up to complete work required to delivery the Faster Switching Programme. They added that RG005 still remains open following the implementation of Retail Energy Code (REC) v3.0 and CSS go-live.

The intention was to look to close the Review Group following the delivery of REC v3.0 and the CSS. However, issues have arisen following the go live of the CSS. These issues were presented to the UNC's Distribution Workgroup meeting on 25th August 2022. The Chair asked whether the Panel would like work to come to close the Review Group or preferred for it to remain open whilst the system issues are addressed and the system settles in, noting that the Faster Switching Programme itself is still open.

The Chair reminded the Panel that in order to close the Review Group a final report needs to be produced. This is then presented to the Workgroup and a decision can be then be made at Panel as to whether the Review Group can be closed.

The Panel unanimously agreed that the RG005 should remain open until the system settles in and the Faster Switching Programme winds down.

The next IGT UNC Panel meeting is scheduled for 23rd September 2022.

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 – September 2022 update
22/07 - 01	29/07/2022	JS informed the Workgroup that a decision is expected to be published by the end of September 2022.	JS	Closed
22/08 - 01	26/08/2022	CA to liaise with Proposer regarding IGT159 Panel discussions and ensure they receive the formal consultation email	TA	Open
22/08 - 01	26/08/2022	CA to seek views from industry regarding a potential change to the November 2022 Release Date. <i>It is proposed that the date be changed from 4th November 2022 to 1st of November 2022, as a result of IGT138V - 'Performance Assurance Techniques and Controls' having a designated implementation date of 1st November 2022. The Panel expect to make a decision on this matter at the September Panel meeting.</i>	TA	Open