

IGT UNC 22-10 Modification Workstream Meeting

Draft Minutes

Thursday, 13th October 2022 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Talia Lattimore	TL	Gemserv	
Claire Roberts	CR	Scottish Power	
Oorlagh Chapman	OC	Centrica	Joined 10:20am. Left at 10:55am after Agenda Item 5.
Kundai Matiringe	KM	BUUK	
Cher Harris	CH	Indigo Pipelines	
Clare Manning	CM	E.On	
Gethyn Howard	GH	Last Mile UK	Left at 10:55am after Agenda Item 5.
Michelle Brown	MB	Energy Assets	
Ellie Rogers	ER	Xoserve	
Amie Lauper-Bull	ALB	Gemserv	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting and no apologies were received.

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 22-08

The Chair informed the Workgroup that no comments were received for the draft 22-08 Modification Workstream meeting minutes prior to the meeting. The Workgroup had no comments to add to the minutes and they were approved as a true and accurate record of the meeting.

4. Outstanding Actions

TL informed the Workgroup that there was one outstanding action as follows:

- **22-07 / 01: ER to confirm whether there are any IGT sites with an AQ greater than 2 million therms (or 58.6 GWh).** The chair provided an update on this under agenda item 8. This action was marked as closed.

MODIFICATIONS

5. IGT159 – Amendments to the “Must Read” Process

TL advised that in its August 2022 meeting, the Workgroup had agreed that IGT159 was complete. The Workgroup Report had been sent to the Panel in September 2022, however the Panel had raised a concern regarding some of the governance in the Modification, specifically the provision for known issues. TL advised that the Modification allowed sites with known issues to be excluded from the “Must Read” process and when an IGT notifies the CDSP of a known issue, the CDSP had an obligation to notify the Shipper. However, there was not a requirement in the Modification or provision in the legal drafting stating that if a Shipper identified a known issue that the CDSP would have an obligation to notify the IGT. The views of the Workgroup were discussed by the Panel and it was noted that the Workgroup agreed that where the CDSP has been notified of a known issue the CDSP would remove the relevant site from the notifications report and that no further notification was necessary. The Panel agreed to send the Modification for consultation but with an additional question asking parties to provide views regarding the need for reciprocal provisions in the Modification and the legal drafting. TL informed the Workgroup that nine consultation responses had been received in total. With regards to the additional Panel question: one respondent did not provide a comment; seven agreed that it was fitting to add the reciprocal provisions.

TL advised the Workgroup that the Proposer has decided to submit a Variation to the Panel to introduce changes that put the reciprocal provisions in place. They added that the Variation would be formally requested at Panel in October 2022 following comments from the Workgroup.

The Code Administrator presented a draft of the Variation to the Workgroup. TL advised that the changes that had been made were minimal, with clean and clearly mirrored provisions and amendments to section two, stating the ability for the CDSP to notify the IGT where a Shipper had notified them of known meter issue.

TL advised that, in the legal drafting, the same approach had been taken to mirror the text already in the drafting for Shippers. The provision for the Pipeline User had been mirrored, which mean that there would now be a requirement for the CDSP to notify the Pipeline Operator.

The Code Administrator invited views from the Workgroup on the proposed Variation and legal drafting. The Workgroup unanimously agreed that the changes to the Modification were necessary and minor but the positive impact they would have would be substantial

GH asked how the implementation timeframes would work if the Variation was approved by the Panel. TL advised that the approach for implementation would be for the Modification to be implemented as soon as possible following Authority decision and in alignment with the delivery and go-live of the CDSP solution.

TL advised that there were two options for delivery of the technical solution. Option 1 would be to implement as part of / following the delivery of the Contact Management System (CMS) rebuild.

Option 1 would be to implement within the current CMS, but this would mean duplicating work after CMS rebuild and it would be more costly. It was noted that Option 1 was the preferred option and delivery timescales had not changed and would be in June to September 2023.

There were no further comments on the proposed Variation or the legal drafting. The Workgroup agreed that the proposed changes were simple and only aimed to provide clarity on the governance. TL advised that the views of the Workgroup would be highlighted to Panel and documented in the Final Modification Report (FMR) and it would be noted that the Workgroup had considered the Variation and the proposed legal drafting put forward by the Proposer and that all were happy to proceed.

TL advised that IGT159 would be considered at the next Panel meeting on 28th October 2022. If the Variation is accepted by the Panel the FMR submitted to Ofgem would be for IGT159V.

6. Cross Code Modification Implications Tracker

TL provided the Workgroup with the following updates:

Watch List

- **UNC0824 – Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas):** The update for this Modification was covered under AOB.
- **UNC0822 – Reform of Gas Demand Side Response Arrangements:** It was noted that once a sponsor had been confirmed for this Modification, it would be added to the 'Equivalent Modifications' tab of the Cross Code Modification Implications Tracker.
- **UNC0819 - Establishing/Amending a Gas Vacant Site Process:** TL advised that it was not yet known if there would be a direct impact to the IGT UNC from this Modification, but further investigation was needed and the Modification would need to be looked at in more detail.
- **UNC0816 – Update to AQ Correction Processes:** TL advised that it was not yet known if there would be a direct impact to the IGT UNC from this Modification, but further investigation was needed and the Modification would need to be looked at in more detail.
- **UNC0811 – Shipper Agreed Read (SAR) exceptions process:** The Workgroup were advised that an extension request had been agreed by the UNC Workgroup which if approved by UNC Panel would see it extended to December 2022. A decision on the request would be reached by the UNC Panel in October 2022.
- **UNC0809 – Distribution of Last Resort Supplier Payment (LRSP) claims to include IGT sites:** TL advised that a decision was still needed from the Authority and no further information had been received.
- **UNC0746 – Application of Clarificatory change to the Annual Quantity (AQ) amendment process within TPD G2.3 from 1st April 2020:** The Workgroup heard that this Modification had been rejected by the Authority on 28th September 2022.

IGT UNC Equivalent Modifications

- **UNC0800 – Introducing the concept of a derogation framework into Uniform Network Code (UNC) (Authority Direction):** The Workgroup heard that, at their August 2022 meeting, the Panel had considered changing the November 2022 Release Date from 4th November to 1st November to limit the number of Code releases in the same week. The Panel sought views on this potential change and agreed at its September meeting that the release date should be changed from 4th November to 1st November 2022. TL noted that IGT160 (which is the IGT UNC equivalent to UNC0800) would now be implemented on 1st November 2022.

Review Groups

- **UNC0754R – Investigate Advanced Analytic Options to improve NDM Demand Modelling:** It was noted that the Workgroup Report had been developed at the meeting in September 2022 and this would be presented at the Panel meeting on 20th October 2022.
- **UNC0812R – Review of Alternatives to “Must Read” Arrangements:** The latest Workgroup meeting took place on 22nd September 2022. An action was taken by the IGT UNC Code Administrator to seek views from IGT's on the use of their “Must Read” Process. The Code Administrator reported back to the UNC Workgroup at this meeting and will continue to monitor the development in this space.

7. IGT UNC Known Issues Register

TL provided the Workgroup with an overview of one new issue added to the Issues Register as follows:

- Code Administrator 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.

AOB

8. Urgent IGT UNC Modification - UNC0822 - Reform of Gas Demand Side Response Arrangements

AJ informed the Workgroup that they have now received confirmation from the CDSP that there are sites that fall within the qualifying threshold of this Modification, noting that there were approximately 25 IGT sites that would qualify.. Sites of that size (2 million therms (or 58.6 GWh)) and above would be eligible to agree arrangements with National Grid in terms of capacity and commodity. AJ stated that to ensure equality for those 25 sites, they must be given the opportunity to give up capacity. This meant that an Urgent Modification was needed to add this into the IGT UNC. AJ noted that an appeal would be sent to Shipper Parties in order to obtain a sponsor the Modification.

9. Urgent IGT UNC Modification - UNC0824 - Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas)

AJ informed the Workgroup that UNC0824 had recently been raised under the UNC and initially it was thought that an equivalent Modification would not be needed in the IGT UNC. This was because the data for the EPG scheme was not going to be at supply point level and therefore was largely at a capacity and commodity level and it would be aggregated amounts rather than site specific. AJ stated that they had subsequently learned that supply point level data would be needed and the amounts would be calculated retrospectively each month from the supply point level data. Therefore, the appointment of the CDSP would need to be recognised in the IGT UNC and therefore a Modification had been drafted. AJ noted that the Proposer would be requesting Urgent Status for the Modification and this would be taken to the Authority in due course. If granted, the Modification would be on an accelerated timescale, but if Urgency was rejected then the Modification would follow the normal process and be directed to Panel.

AJ advised that when UNC0824 was taken to the UNC Panel, there had been criticism due to the consultation period of one working day. Ofgem had acknowledged this and there would now be an expectation that the consultation period be longer should Urgency be granted.

KM stated that at the Data Services Contract (DSC) Committee meeting on the day prior, non-domestic schemes had been discussed with the Department for Business, Energy and Industrial Strategy (BEIS) and asked if this had been mentioned in relation to the IGT UNC Modification. ER added that Modifications under the UNC and IGT UNC should be considered at the same time to align processes. AJ stated that they had not received any information but would keep the Workgroup updated once further information had been made available, adding that they would contact the Joint Office to get a sponsor for the IGT UNC modification.

10. UNC0734S Reporting Valid Confirmed Theft of Gas (TOG) into Central Systems

AJ advised that UNC0734S had been on the Code Administrator's radar for some time and an equivalent Modification to the IGT UNC was needed, as there were no theft provisions in the IGT UNC. AJ advised that a sponsor was needed for a Modification the IGT UNC, however the CA did not have clarity on what was needed to be written into the Modification as there were no provisions in the IGT UNC, which caused a challenge and made it unclear what should be written into the modification.

AJ suggested that a review request could be raised to determine what the Modification should include, then move straight into drafting the Modification in order to raise it quickly. AJ added that, unless a review was conducted and someone agreed to draft the Modification, there would not be a way to progress this change.

KM stated that there had been an update with regards to the soft-launch date change for the TOG process. ER advised that the CDSP was looking to implement a technical solution for theft on 26th October 2022 as UNC0734S required an equivalent Retail Energy Code (REC) change to ensure the data would be sent to the CDSP, which means the technical solution would not go live until the REC change was ready.

ER added that they did not wish to turn off the current theft process until a new process was ready and in place. The technical solution could be delivered ready for the change to be implemented, but it would not be used in practice until the REC change went live. ER stated that confirmation of the timescales for the REC change had not yet been received.

It was highlighted that there were already provisions for theft in the UNC. It was suggested that, in order to draft a Modification, it may be necessary to look at the old SPAA text and compare this to what was written in the REC in order to formulate a solution for the IGT UNC.

AJ advised that the Proposer of UNC0734S had requested that the Modification be discussed by the IGT UNC Workgroup. The Workgroup agreed that it should be put on the agenda for the next IGT UNC Workstream meeting.

KM advised that they had recently conducted e-learning on TOG and stated that it would be a useful resource for the Workgroup. KM agreed to share the document with the group in order to help progress the Modification.

Action 22/10 – 01: KM to share TOG e-learning with the Workgroup in order to help progress the IGT UNC equivalent modification for UNC0734S.

The next Workgroup meeting is scheduled for Thursday 10th November 2022.

Annex 1 – Actions Table

Reference	Action	Owner	Status
22/07 - 01	ER to confirm whether there are any IGT sites with an AQ greater than 2 million therms (or 58.6 GWh).	ER	Closed
22/10 – 01	KM to share TOG e-learning with the Workgroup in order to help progress the IGT UNC equivalent modification for UNC0734S.	KM	Open