



IGT UNC 22-11 Modification Workstream Meeting

Final Minutes

Thursday, 10 November 2022 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Michelle Brown	MB	Energy Assets	
Cher Harris	CH	Indigo Pipelines	
Claire Manning	CM	E.ON	
Kundai Matiringe	KM	BUUK	
Claire Louise Roberts	CLR	Scottish Power	
Ellie Rogers	ER	Xoserve	
Talia Lattimore	TL	Gemserv	Code Administrator
Rachel Black	RB	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 22-10

Talia Lattimore (TL) informed the Workgroup that no comments were received for the draft 22-10 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

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

- **22/10 – KM to share Theft Of Gas (TOG) e-learning with the Workgroup in order to help progress the IGT UNC equivalent modification for UNC0734S.**: A meeting was held with Kundai Matiringe (KM) (BUUK) and Ellie Rogers (ER) (Xoserve). They advised they now needed to schedule a meeting with relevant Code Administrators to discuss further. They asked if TL could circulate a link to some useful e-learning on TOG. TL agreed that they could circulate this link to industry on their behalf. The action is now considered closed.

PRE-MODIFICATIONS

5. UNC0822 (Urgent) - Reform of Gas Demand Side Response Arrangements

The Chair explained to the Workgroup that UNC0822 was raised as an urgent Modification and has now been implemented within the Uniform Network Code (UNC). The Chair advised that it allowed sites on the UNC Distribution Networks (DNs) to give up some of their capacity and be rewarded. The Modification was raised and implemented urgently so the changes to the Demand Side Response (DSR) arrangements could be used prior to winter when there might be concerns around supply.

The Chair stated that they had spoken with Ofgem and advised them that if these facilities are to be made available to sites under the UNC there is an expectation that it would also be available to IGT sites. The Chair added that Ofgem have advised that IGT sites should be given equality with DN sites.

Claire Louise Roberts (CR) asked what volume of eligible sites are IGT sites. The Chair advised that it was believed to be about 5%. The Chair explained that the total number of eligible sites is about 550. The Chair advised that eligible sites are large sites (Product Class 1 (PC1) and Daily Metered (DM)) which will be using a large quantity of gas.

The Chair informed the Workgroup that the Code Administrator has been unable to get a sponsor for the equivalent IGT Modification and this is likely due to the fact that it is uncertain what needs to be included in the IGT solution. The Workgroup were advised that the issue had been discussed with the IGT UNC Panel and that a pragmatic approach had been put forward, whereby the Workgroup would step through the UNC Modification in this meeting and consider how it might be implemented in IGT UNC. The Chair also suggested that they focus their efforts on the Business Rules (BRs). The members agreed with this approach.

Talia Lattimore (TL) took the members through the BRs (as set out in the UNC0822 Final Modification Report). Workgroup views and conclusions for each BR are as follows:

Invitation to Offer section

1. The Chair stated that provisions for this BR will be needed but may need to be effected through the UNC as National Grid are not a party to the IGT UNC. This may mean that an additional Modification might be needed in the UNC to accompany the IGT UNC Modification. Other members agreed with this view.
2. The Chair advised that provisions for this BR also need to be included in the UNC. CR agreed with this and stated that BR2 links in with BR1. Other members agreed with this view.
3. TL advised that their interpretation of this BR was that it seeks to allow the User to request that the DSR options offered to National Grid can only be accepted for the Winter Periods offered. This might imply that it is an 'all or nothing' option. TL asked for clarification on who the User is with regards to UNC0822. Ellie Rogers (ER) advised that the User is the Shipper. ER added that National Grid can accept all the DSR options provided by a User, but some

Users may submit an individual offer for a Winter Period. However, the Shipper will be able to state their preference to National Grid for it to consider. A Party queried whether there was selection within the invite. The Workgroup agreed that this was a Shipper / National Grid level requirement and that it sits within the UNC and could be cross referenced to in the IGT UNC.

4. The Chair advised that this BR is something that will be covered under the UNC and pointed to within the IGT UNC. ER advised that the DNs are not necessarily involved in this from the UNC perspective. ER advised that in theory, this is an interaction between National Grid and the Shipper. The same would apply from the IGT perspective. The Chair advised that this still comes under the scope of the UNC, though there is an element of IGT governance within the UNC, as the gas is going through larger networks to reach the IGT networks, which has the Supply Point level relationship. The Workgroup agreed that this was a Shipper / National Grid level requirement and that it should sit within the UNC and be cross referenced to in the IGT UNC to ensure IGT sites are covered.
5. Claire Manning (CM) advised that sites that are eligible under the UNC0822 solution are significantly large customers, and therefore could only look to reduce capacity between certain hours. The Chair proposed that this rule is describing the transaction between National Grid and the Shipper. The Workgroup agreed that this was a Shipper / National Grid level requirement and that it should sit within the UNC and be cross referenced to in the IGT UNC.
6. The Workgroup agreed that this was a Shipper / National Grid level requirement and that it should sit within the UNC and be cross referenced to in the IGT UNC.
7. The Workgroup agreed that this was a Shipper / National Grid level requirement and that it should sit within the UNC and be cross referenced to in the IGT UNC.

National Grid NTS Assessment of Offers section

8. The Chair advised that this BR describes giving instruction to National Grid, and that these instructions could only be within the UNC. A Party advised that acceptance of offers cannot be prioritised. CM agreed with this and advised that Parties must abide by the guidance. The Workgroup agreed that this was a Shipper / National Grid level requirement and that it should sit within the UNC and be cross referenced to in the IGT UNC.
9. TL suggested, when looking at this BR, that it implied that only a certain number of offers could be accepted. The Chair advised that there could be certain issues surrounding this and that the working practices of National Grid may need to be considered. The Workgroup agreed that this was a Shipper / National Grid level requirement and that it should sit within the UNC and be cross referenced to in the IGT UNC.
10. The Workgroup agreed that this was a Shipper / National Grid level requirement and that it should sit within the UNC and be cross referenced to in the IGT UNC.
11. TL advised that this BR implies that the volume of energy for the DSR options has no limit. The Workgroup agreed that this was a Shipper / National Grid level requirement and that it should sit within the UNC and be cross referenced to in the IGT UNC.

12. The Chair advised that this arrangement would be between National Grid and the Shipper. The Chair suggested that this is an upstream transaction (i.e. it is the NTS that wants to see the Customer offered gas in its network) and is covered under the UNC. TL queried how this works in terms of payments. The Chair stated that it appears that if you are getting gas back into your network, then there is a transaction there. The Chair advised that the money is coming from National Grid and will be passed on to the Shipper. ER advised that they are provided with a schedule by National Grid and that they pay Shippers according to said schedule. They added that the payments are made to the Shipper and are a customer benefit. The Chair advised that the Shipper receives the money and applies it to the consumer who has made the arrangement, and this should be referenced under IGT UNC, though it remains a National Grid / Shipper facing activity. Workgroup members agreed with this view.
13. The Chair stated that this BR was related to Shipper / National Grid activities but should be referenced under the IGT UNC. Workgroup members agreed with this view.
14. TL advised that this BR ensures that accepted DSR offers come into force immediately following National Grid notification to the User. The Chair agreed and suggested that the legal text would need to be looked at in relation to this to ensure it is appropriately recognised under the IGT UNC.
15. CM suggested, when looking at this BR, that it appears to set out requirements for general industry notifications. TL and other Workgroup members agreed. It was suggested that this be referenced under the IGT UNC.

Accepted Offers from the National Grid Invitation Obligations section

16. TL asked Workgroup members what “OCM DSR Locational Market” meant in this BR. CM advised that this is the website/portal where Shippers can upload DSR offers. The Chair advised that this is a Shipper activity under the UNC. Working practices would need to be reviewed for implications to the IGT UNC
17. TL noted that this rule is similar to the previous rule. TL also advised that it is not entirely clear how this will work operationally, though this BR is a Shipper facing activity under the UNC.
18. TL questioned the definition of “output nomination” and whether this is a DSR specific term. The Chair stated that all DM sites on IGT networks are known at a distribution level as they are large sites. The Chair also advised that these site level details are in place for IGT sites as well. After some discussion it was agreed Code Administrator would ensure that any IGT Modification raised would use the same definition for ‘output nomination’. ER advised that the definition for this term is currently referenced in TPD C2.2.1.
19. TL suggested that this BR concerns the activity of posting an offer and is therefore a Shipper activity and should be referenced within the IGT UNC.
20. TL suggested that this rule concerns requirements around pricing and is therefore National Grid / Shipper level but should be referenced within the IGT UNC.
21. TL proposed that this was a National Grid and Shipper activity and should be referenced within the IGT UNC.

22. The Chair observed that from a Shipper perspective, there are penalties if a DSR Market Offer is not posted correctly, based on this BR. The Chair suggested that this rule concerns Shipper actions and the IGT UNC must ensure they operate in accordance with the rules specified by the UNC.
23. There was some discussion by members about what 'review performance' meant. The Chair advised that this is likely a review of a Shipper's performance with regards to submitting Offers and is linked to BR22.
24. TL suggested that this BR sets out the high level process for when a User is disputing an invoice. TL advised that National Grid and the User will work together to reach a resolution and that this is within the scope of the UNC.
25. The Chair highlighted that this BR references existing UNC obligations that will apply a User. It was agreed that the Code Administrator should ensure that any Modification raised should consider whether these existing UNC obligations are appropriately referenced.
26. The Chair advised that, from looking at this rule, it appears that if you post something within the hour and do not have an option accepted, then it will not be applicable.
27. TL advised that this is a National Grid / Shipper level activity and that it should sit within the UNC, though will need to be referenced within the IGT UNC.
28. TL noted that this BR relates to a change in registered User, which implies a change of Shipper. They added that the originally Registered User will cease to be responsible for obligations under DSR when they cease to be the Registered User. The new Registered User may notify National Grid as to whether they wish to take on the arrangements agreed with the previous Registered User. TL advised that the detail for this BR will remain still under UNC. The Chair advised, when looking at point (a) that there appears to be site level aspect to this BR. The Chair stated that if this is the case, and the Registered User has entered into these arrangements, it is up to the Shipper to act in accordance with the UNC. If we extend the governance of this to the IGT sites in the UNC we may need to pull out more detailed provisions for this BR in the IGT UNC. The Chair also advised that the Code Administrator needs to check if dual governance could apply here.
29. TL advised that this is a Shipper facing activity and the BR seeks to ensure that the Shipper is required to do the things as specified. The Chair agreed and advised that they must ensure that the IGT UNC Registered Users' activities are taken care of by the Shippers, and it was agreed that a cross reference to necessary provisions was required under the IGT UNC.
30. The Chair queried if a Registered User would need to put this in their contract and added that there needs to be an obligation on Shippers under the IGT UNC if this is the case. The Chair also advised that this is an IGT UNC transaction.
31. TL advised that this is a National Grid UNC level but needs to be referenced in the IGT UNC.
32. TL advised that this BR ensures that once a DSR option is accepted, it cannot be cancelled by a User. TL suggested that this was a UNC level requirement but needed to be referenced in the IGT UNC.

33. TL queried if the cancellation could be initiated by the Consumer. TL also queried if this could result in Supply Point level activities. The Chair advised that if it says you can cancel, it needs to be reflected in IGT and UNC obligations. The Chair stated that this must be made clear to the Consumer, and that it all must be documented in governance.
34. TL advised that this BR clarifies that commercial terms detailing the basis on which payments can be passed is outside the scope of the UNC. This will need to be referenced in the IGT UNC.
35. ER advised that the CDSP will deal with credits and debits for shippers based on the schedule provided by National Grid. ER advised that shippers will be invoiced monthly. The Chair noted that how the gas reaches the site is almost irrelevant, as long as it ends up back in the National Grid network. TL noted that this BR is ensuring provision of data at an IGT level. TL queried whether National Grid could see the supply point level data. The Chair advised they would speak with National Grid about this. The Chair also stated that National Grid working assumptions are needed here to determine whether National Grid need permissions to do this under the IGT UNC. This will require further discussions with National Grid. It was agreed that this would be taken as an action by the Code Administrator.
36. TL stated that this BR is at a UNC level but will need referenced within the IGT UNC.
37. TL stated that this BR is at a UNC level but will need referenced within the IGT UNC.
38. TL stated that this BR is at a UNC level but will need referenced within the IGT UNC.
39. TL stated that this BR is at a UNC level but will need referenced within the IGT UNC.
40. TL stated that this BR is at a UNC level but will need referenced within the IGT UNC.
41. The Chair stated that this rule is not relevant to the IGT UNC.
42. TL queried what the “balancing neutrality mechanism” was. ER stated that this is referencing the mechanism in which the CDSP manage balancing on the system, and it ensures that the input matches the output. ER advised that they issue energy balancing invoices on behalf of National Grid. The Chair added that gas for IGT networks will be included in these invoices this should be referenced in the UNC.
43. TL stated that this BR is at a UNC level but will need referenced within the IGT UNC.

Opening and Closure of the OCM DSR Locational Market section

44. ER explained to the members that OCM was an acronym for “On the day Commodity Market”, and that it refers to the market they use for DSR. It was agreed that this should be referenced in the UNC.
45. It was agreed that, like BR44, this relates to the market used for DSR and should be referenced in the UNC.

When having an initial discussion on the legal drafting for UNC0822, TL advised members that the drafting maps fairly easily too the BRs and that it should not be too difficult to determine which provisions related to which BR.

The Chair asked if Shippers could confidentially inform the Code Administrator of whether they are aware of any customers they have who would consider using this scheme on IGT networks this winter. The Chair advised this would help with the question of urgency and help determine how quickly the Modification needed to be progressed. The Chair advised that they would look to put some general questions to Parties who are included on the circulation list. CR advised that they would also contact anyone they thought might be interested.

Action 22/11 – 01: The Code Administrator to check that all groups involved are using the same definition for ‘output nomination’.

Action 22/11 – 02: The Code Administrator to hold talks with National Grid to discuss their working assumptions to aid in determining what data permissions may be required under the IGT UNC.

Action 22/11 – 03: Shippers to privately inform the Code Administrator if they know of any customers on IGT networks that may consider using this scheme.

6. Cross Code Modification Implications Tracker

TL provided the Workgroup with the following updates:

Watch List

- **0822 – Reform of Gas Demand Side Response Arrangements:** TL advised that this UNC Modification now been implemented, and they are looking for a sponsor to raise an IGT UNC equivalent Modification.
- **0819 – Establishing/Amending a Gas Vacant Site Process:** TL advised that the amended Modification was considered at the October UNC Workgroup meeting. TL advised that the Workgroup report on this Modification is expected in January 2023.
- **0816 – Update to AQ Correction Processes:** TL advised that the last UNC Workgroup meeting was held at the end of October, and that an Amended Modification is to be considered. TL advised that they were uncertain if it would be going to Panel this month.
- **0813 – Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers:** TL advised that the last meeting was held on 3 November. TL advised that an Amended Modification is to be considered, and the Workgroup Report would be going to Panel in January.
- **0811 – Shipper Agreed Read (SAR) exceptions process:** TL advised that an extension was approved, which has moved the Workgroup Report back to December. The Chair advised that they will be looking for sponsors depending on the legal drafting. ER advised that the legal drafting will be provided for the next distribution Workgroup meeting.

IGT UNC Equivalent Modifications

- **0824 – (Urgent) - Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas):** TL advised that an IGT UNC

Equivalent Modification was raised (IGT162 - Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas)). TL advised that it is currently out for consultation, and responses are due by 16 November 2022.

- **0674 – Performance Assurance Techniques and Controls:** TL advised that this Modification and IGT138V - Performance Assurance Techniques and Controls were implemented as part of the November Release.
- **0800 – Introducing the concept of a derogation framework into Uniform Network Code (UNC) (Authority Direction):** TL advised that this Modification and IGT160 - Introducing the concept of a derogation into the IGT UNC for innovation projects were implemented as part of the November Release.
- **0808 – Reverse Compression:** KM advised that this Review Group should be added to the tracker as the Modification is being redone to keep in line with Option 3. The Chair agreed to put this on the watch list.
- **0830 – Obligation for Shipper to pay CDSP for Class 1 read service:** The Chair advised that this may have an impact on the IGT UNC. TL agreed to add this to the watch list.

Review Groups

- **0754 – Investigate Advanced Analytic Options to improve NDM Demand Modelling :** TL advised that the Workgroup Report was presented to Panel on 20 October, where it was agreed to close with no Modification expected.
- **0812R – Review of Alternatives to “Must Read” Arrangements:** Kundai Matiringe (KM) advised that they had attended the last meeting, and they decided an extension was needed as participants had to review some outstanding questions. KM advised that it was to go back to this month’s distribution Workgroup. The Chair asked if this should be reviewed as a requirement, and KM agreed. The Chair advised that the processes mirror each other greatly, but that they have a Modification that has been sent to Ofgem that refines the process in the IGT UNC. The Chair advised that there may be another Modification being proposed to keep in line with this.

7. IGT UNC Known Issues Register

TL advised the Workgroup that there were no new updates to the Known Issues Register.

AOB

8. IGT162 - Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas)

TL advised that this Modification was raised with a request for Urgency. Urgency was rejected and the Panel agreed the Modification should continue as an Authority Decision Modification. The Modification

is currently out for consultation with responses due by 16th November 2022. TL invited members to review and respond to the consultation.

The next Workgroup meeting is scheduled for 8th December 2022.

Annex 1 – Actions Table

Reference	Action	Owner	Status
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	Closed
22/11 – 01	Code Administrator to check that all groups involved are using the same definition for 'output nomination'.	Code Administrator	Open
22/11 – 02	Code Administrator to hold talks with National Grid to discuss what permissions they have under IGT.	Code Administrator	Open
22/11 - 03	Shippers to privately inform the IGT UNC of any customers they think would consider using this scheme on IGT networks this winter.	Shippers	Open