

## IGT UNC Modification Panel Meeting

### Draft Minutes

Friday 25<sup>th</sup> November 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	
Jenny Rawlinson	JR	BUUK	Pipeline Operators	IGT162 Proposer
Jennifer Semple	JS	Ofgem	Authority	
Richard Pomroy	RP	Wales and West Utilities	Observer	Distribution Network (DN)
Stuart Monk	SM	MUA Group	Pipeline Operators	
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, Stuart Monk (SM) added item 11 – Thank You.

#### 3. Approval of the previous minutes (22-10 and 22-10 Reconvened)

The CA invited comments on the October 2022 meeting minutes noting that Jenny Rawlinson (JR) provided comments on the minutes prior to the meeting. The Panel accepted the proposed changes to the minutes and no further comments were raised during the meeting. The Panel approved the minutes (both standard and reconvened meetings) as a true and accurate account of the meetings.

#### 4. Outstanding Actions

The Panel were informed that there were no outstanding Panel actions.

#### Modification Business

#### 5. [IGT162 – Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee \(EPG\) for Domestic Gas Consumers \(Gas\)](#)

The Chair provided the Panel with an overview of the history and the intent of IGT162.

TL took the Panel through responses to the IGT162 consultation, noting that there were three responses received, all of which were received from IGT parties. They added that all respondents agreed with the implementation of the Modification, that the solution and legal text delivered the intent of IGT162 and with the implementation approach.

The Panel considered the responses received to the IGT162 consultation and unanimously agreed that there was no further work required on this Modification. The Panel, having considered responses to the IGT162 consultation, unanimously agreed:

- that IGT162 will not have an impact on any SCRs;
- that IGT162 should be treated as an Authority Decision Modification as it did not meet the Self-Governance Criteria due to the material impact it would have on Consumers;
- that the solution delivers the intent of the Modification and meets the needs identified by the Panel;
- that the impacts highlighted within the Modification are an accurate reflection and had nothing more to add;
- the Modification will have a positive impact on Relevant Objectives (D), (E) and (F);
- with the proposed implementation approach, noting that as the EPG Scheme is already running without the necessary provisions to administer the Scheme in the IGT UNC the Modification should be implemented as soon as possible after approval;
- that the Legal Drafting delivers the intent of the IGT162 solution; and
- that no further work is required on this Modification, and it could proceed to the Authority for decision.

The Panel unanimously agreed to recommend to the Authority that IGT162 should be implemented. The Panel noted that as the EPG Scheme is already running and includes IGT Supply Points that an expedited decision by the Authority and the immediate implementation of the Modification following approval would be welcomed.

### **Review Groups**

#### **6. [RG005 - IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements](#)**

The Chair provided an overview of the purpose of RG005. They advised that the Faster Switching Programme has recently been formally closed by Ofgem. The Chair advised that, as the programme has been closed, it is now time to consider the closure of RG005.

The Chair reminded the Panel that the reason the Review Group remained open was to ensure that no issues had arisen following the implementation of Faster Switching Modification that might need the Review Group to review. They added that the Panel agreed that RG005 should be revisited following the formal closure of the programme.

The Chair asked the Panel to consider sending the Review Group back to Workgroup in February 2023, where it will consider an updated report which the Code Administrator will prepare in advance of the meeting. Once the report has been agreed by the Workgroup it will go back to Panel for final decision and closure.

The Panel unanimously agreed to send RG005 back to Workgroup for the February 2023 meeting.

## **Authority Updates**

### **7. Authority Updates**

Jennifer Semple (JS) advised that the Ofgem publishing moratorium over the holiday period will start on 15<sup>th</sup> December 2022. Ofgem will begin to publish again on 4<sup>th</sup> January 2023.

JS advised that Ofgem are expecting to publish a call for input on key areas of Code Reform soon and added that the timeline for publication is under review as they wait for the outcome of the bill from Government.

### **8. Ofgem's Expected Decision Dates**

The Panel were directed to Ofgem's latest Expected Decision Dates which were published on 24<sup>th</sup> November 2022. The table stipulated that:

- [IGT132VV - Introduction of IGT Code Credit Rules](#)
  - Decision expected by 30<sup>th</sup> November 2022
- [IGT159V - Amendments to the Must Read Process](#)
  - Decision expected by 2<sup>nd</sup> December 2022

The Chair asked if there was any further insight with regards to the IGT132VV decision and if approval will have any conditions. JS advised that they had no specific update with regards to IGT132VV.

JR advised that (as the Proposer organisation) they intend to raise a housekeeping Modification following approval to apply clarification regarding transportation charges, which was highlighted and was agreed as being needed during the end of the development.

The Chair referenced a new UNC Modification ([UN0827S - Amending the Unsecured Credit Table in TPD V3 to reflect the removal of Graydons and insertion of Creditsafe](#)) which looks to remove reference to Graydons and replace it with Creditsafe. They added that IGT132VV mentions Graydons in its legal drafting so if it is approved a housekeeping change may be needed to remove reference to

Graydons and replace it with another credit agency if the UNC0827S is approved. This will likely be progressed as a housekeeping Modification.

## AOB

### **9. UNC0822 – Reform of Gas Demand Side Response (DSR) Arrangements**

The Chair noted that at the last Panel it was indicated that a Modification to the IGT UNC would be needed to introduce necessary permission in Code to allow the DSR activities to apply to IGT sites. It was agreed that UNC0822 would be discussed at the November Workgroup meeting to help parties understand the impacts of the Modification on the IGT UNC.

The Chair advised that the Business Rules were worked through by the Workgroup and the work required to the IGT UNC appears to be a little simpler than first thought. Shippers will have the same responsibilities under IGT UNC as they do in the UNC so reference to those applying to IGT can be made. There may also be a mod needed in the UNC to assist in the implementation of the IGT UNC Modification as there needs to be obligations on National Grid to ensure that provisions and actions apply as appropriate on to IGT sites as they would on DN sites. They noted that transactions and interactions happen between Shippers and National Grid and these are reflected in the UNC. The same needs to apply to IGT sites but obligations cannot be placed on National Grid under the IGT UNC.

The Chair advised that they have taken an action to discuss the situation with National Grid and to determine how the DSR process will work in practice. The Chair will report back once they have spoken to National Grid and will continue to provide updates on the status on the IGT Modification. It was noted that regardless of whether a Modification sponsor is identified, this Modification will continue to be required.

JR asked whether the Code Administrator will continue to work on the potential IGT Modification to identify what is needed and once that is complete if it's then a matter of the Modification being raised. The Chair confirmed that this is the case and noted that there is more visibility now about what is needed. The Chair noted that the arrangements not being in place at the moment may not be an issue for this calendar year as the scheme is only just going to be offered at the end of November so it may be something that Shippers have more interest in from the New Year.

JR referenced their experience with [trying to get Urgent Status applied to IGT162 - Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee \(EPG\) for Domestic Gas Consumers \(Gas\) Ofgem regarding the IGT162 Urgency Decision](#). They were advised by Ofgem that one of the reasons why urgency was not granted was because ~~there was~~ not enough urgency was applied between identifying the need for the Modification and getting to the Modification to Ofgem. ~~and It was suggested that we noted that we should~~ ensure we are recording the information-actions

~~taken~~ appropriately where we are waiting on information from other parties ~~(e.g. National Grid)~~. ~~For example, they asked if we were waiting on National Grid for information as JR felt that we don't should not be want to be~~ in a position ~~where we are not raising Urgent Modifications because we think Urgent Status will not be granted. The consequence of that is there will be rules applied that should be under the IGT UNC that are not within Code.~~ ~~of not raising an Urgent Modification~~. The Chair noted that ~~at the moment National Grid are not considering it was not National Grid's intention to have DSR apply to IGT sites. The Chair and they hadve been discussing this matter with National Grid and Ofgem and it was felt that are not looking to make an arrangement with these sites. The indications were that~~ IGT sites should be offered the same arrangements as DN sites and a Modification is needed to allow this. ~~JR requested that we minute the fact that on the face of it at the moment it does not look like the scheme will be applied to IGT sites but if we were to get confirmation that it will apply to them there would be a need for an Urgent Modification under the IGT UNC.~~

Richard Pomeroy (RP) advised that the DSR arrangements are of interest to DN's and they raised the issue with National Grid that there are no formal arrangements in place for them to be informed when a DN site is taking part. This means that they would not know if a site was taking part and may load shed them based on the gas they would have taken.

The Chair confirmed that the Workgroup talked about which Parties might be motivated to raise an IGT Modification and they agreed that IGTs would be agnostic which would leave Shippers. At the meeting the Chair felt that Shippers may feel the arrangements are onerous and may not be incentivised to use DSR if they don't have a customer who has approached them to take part. JR asked, in the scenario where a Shipper has an IGT customer that wants to take part, if the arrangements are not in place under the IGT UNC will the Shipper have to raise an Urgent IGT UNC Modification to get the necessary permissions and provisions in place. The Chair noted that the necessary changes need to be in Code so yes, the Shipper will need to raise a Modification.

JR suggested industry comms be issued advising that at the moment this scheme is not reflected in the IGT UNC and a modification is needed and highlighted that should a Shipper have a customer on an IGT Site that wants to take part in the Scheme, a Modification will need to be raised.

**Action 22/11 – 01: Code Administrator to issue industry communications advising that the DSR scheme is not currently reflected in the IGT UNC and that a Modification is needed to enable customers on IGT sites to take part in the Scheme.**

#### **10. December 2022 Panel Meeting Date**

The Chair advised that the December 2022 meeting is currently scheduled for the 23<sup>rd</sup> December. They advised that there have already been some apologies received and asked if the Panel are still happy for the meeting to continue to be held that day.

Some Panel members advised that they are working and are therefore happy for the meeting to happen as scheduled, with others either being on annual leave and able to dial in or having appointed an alternate.

The Panel asked if a change of meeting date would be helpful for the CA. The CA advised that it would be helpful if the date was changed due to internal annual leave. The Panel agreed to move the meeting to Wednesday 21<sup>st</sup> from 9am - 10am as there is currently no decision / items expected for December. The Panel agreed that the CA will put the meeting in for an hour, with the expectation that any decisions that are required are made during that hour and anything else for discussion is discussed after 10am.

#### **11. Thank You**

SM wished to thank Panel members and the Code Administrator for the support they have received ahead of and during their first Panel meeting.

**The next IGT UNC Panel meeting is scheduled for Wednesday 21<sup>st</sup> December 2022.**

**Annex 1 – Actions Table**

Reference	Date	Action	Owner	Status
22/11 – 01	25/11/2022	CA to issue industry communications advising that the DSR scheme is not currently reflected in the IGT UNC and that a Modification is needed to enable customers on IGT sites to take part in the Scheme.	Code Administrator	Open

DRAFT