

**IGT UNC 23-03 Modification Workstream Meeting**

**Draft Minutes**

**Thursday, 9<sup>th</sup> March 2023 via Teleconference**

<b>Attendee</b>	<b>Initial</b>	<b>Organisation</b>	<b>Notes</b>
Anne Jackson	AJ	Gemserv	Chair
Charlotte Gilbert	CG	BUUK	
Cher Harris	CH	Indigo Pipelines	
Claire Louise Roberts	CR	Scottish Power	
Ellie Rogers	ER	Xoserve	
Isaac Moore	IM	Gemserv	Secretariat
Jenny Rawlinson	JR	BUUK	
Michelle Brown	MB	Energy Assets	
Oorlagh Chapman	OC	Centrica	Present for Items 7 to 9
Talia Lattimore	TL	Gemserv	Code Administrator

**1. Welcome and Apologies for Absence**

The Chair welcomed attendees to the meeting and accepted apologies received from Clare Manning (E.ON).

**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 23-02**

TL invited comments on the February 2023 Workstream meeting minutes noting that Jenny Rawlinson (JR) had made two recommended changes. These were to correct a typo in the members section and to amend the wording to indicate that an external member from National Gas Transmission would be attending any applicable meetings rather than a specific Workgroup meeting. There were no further comments received and the minutes were approved as a true and accurate account of the meeting.

**4. Outstanding Actions**

TL informed the Workgroup that there were 3 outstanding actions as follows:

- **23/02 - 01:** CA to circulate the Terms of Reference (ToR) for the RG005 Review Group alongside the RG005 Report. The ToR are included in the RG005 Review Group Report which was circulated ahead of the meeting. The Workgroup agreed that this action should be closed.

- **23/02 - 02:** CA to approach the Proposer to determine considerations up to this point for IGTs and the IGT UNC with regards to UNC0828R – Introduction of an Independent Shrinkage Expert. TL informed the Workgroup that they had a meeting set with the UNC0828R Proposer and would report back to the Workgroup on the discussions at the next Workgroup Meeting. The Workgroup agreed that this action should be closed.
- **23/02 - 03:** CA to review the current Cross Code Tracker and develop an example as to how to capture historic information regarding assessing UNC Modifications. TL reviewed the Cross Code Tracker and presented recommended changes to the Workgroup. The Workgroup agreed that this action should be closed.

## **MODIFICATIONS**

### **5. [IGT163 – Code Credit Rules Housekeeping updates following IGT132VV approval](#)**

#### **Summary**

The Proposer (JR) gave an overview of this Modification, noting that there were three areas of change following the approval of IGT132VV – Introduction of IGT Code Credit Rules. These were:

- Clarification changes to ensure its clear that the IGT132VV credit rules will apply to transportation charges only;
- Removal of “Graydons”, which was replaced with “CreditSafe” in the UNC under UNC 0827S - Amending the Unsecured Credit Table in Transportation Principles Document (TPD) V3 to reflect the removal of Graydons and insertion of CreditSafe; and
- Changes to address some typos that were highlighted by Ofgem in their decision letter for IGT132VV.

TL asked the Workgroup if they had any questions, to which none were raised. All members agreed that this Modification is straightforward in principle. TL took the Workgroup through the draft Workgroup Report.

#### **Governance**

TL informed the Workgroup that the Proposer recommends that this Modification be treated as a Self-Governance Modification Proposal as it is unlikely to have a material impact on the end consumer or to discriminate between industry parties.

TL asked if any Workgroup members disagreed with the views of the Proposer, to which none were raised. The Workgroup agreed unanimously that this Modification should proceed under Self-Governance.

#### **Impacts**

TL took the Workgroup through the impacts cited by the Proposer. The Workgroup considered the potential impact on Significant Code Reviews (SCRs) or other projects. The Workgroup unanimously agreed that there were no impacts on any SCR or other projects.

TL verified with the Proposer that the Cross-Code impacts were correct following discussion at the February Panel meeting. The Proposer confirmed that they were indeed correct as set out in the draft Workgroup Report. TL asked if the Workgroup had any questions or insights with regards to Cross-Code impacts, to which there were none raised. The Workgroup unanimously agreed with the Cross-Code impacts.

TL asked if there were any other questions or issues or insights with regards to the impacts, including consumer impacts, to which none were raised. The Workgroup unanimously agreed that the impacts cited in the draft Workgroup Report were an accurate reflection.

#### Relevant Objective

TL advised the Workgroup that the Proposer believes that the Modification has a positive impact on Objective (F) “Promotion of efficiency in the implementation and administration of the IGT UNC”. TL asked the Workgroup if they agreed with this assessment, and whether any other Objectives were impacted. No questions were raised and no other impacts were cited. The Workgroup unanimously agreed on the positive impact to Objective (F) for the reasons given by the Proposer.

#### Implementation

TL noted that the Proposer recommends that this Modification be implemented at the same time as IGT132VV. This was to make sure efficient and effective alignment of the changes to the IGT132VV Legal Drafting. TL informed the Workgroup that the Modification Panel initially agreed with this approach. TL asked the Workgroup if they had any questions or issues with the proposed implementation approach, to which none were raised. The Workgroup agreed unanimously to the proposed implementation approach.

#### Legal Text

TL explained the approach to the Legal Text noting that the approved IGT132VV Legal Drafting was used as black baselined text with the changes to that text being show in red. TL asked the Workgroup if they had any issues or questions with regards to the proposed Legal Drafting. TL asked if the Workgroup believe that the Legal Drafting delivers the intent of the solution. The Workgroup agreed unanimously that the Legal Drafting delivers the intent of the IGT163 solution.

#### Final Recommendations

The Workgroup unanimously agreed to recommend to the Panel:

- that Self-Governance Modification should proceed to consultation.

#### Next steps

TL informed the Workgroup that the Workgroup Report would be finalised and presented at the March 2023 Panel. The consultation period set out in the timetable was the standard 15 working days which

would see a final decision being made by the Panel at the end of April. TL added that the timing of the Panel meetings in March and April would allow this Modification to proceed quickly. TL asked for final views on this Modification. No comments or questions were raised.

## **6. IGT164 – Alignment with DCP349 and Provision of Unsecured Credit**

### Summary

JR introduced this Modification as a further alignment Modification for IGT132VV. During the period of development for IGT132VV, there was a change to the DCUSA credit rules (DCP349 – ‘Effectiveness of the current provision of unsecured cover under Schedule 1’) and the original IGT132VV credit rules were based on existing DCUSA credit rules. Without this Modification, the implementation of IGT132VV would cause a misalignment between the two Codes.

JR presented the credit allowance factor as the methodology to follow under DCP349. An organisation would receive a credit rating which then determined their credit allowance. In the case where the organisation did not have a credit rating, the DCUSA would allow a credit allowance to be built up based on good payment history. This good credit history was only based on the premise that the invoices were paid on time. With a period of good payment history, a party could bypass the need for a separate credit rating. JR informed the Workgroup that this was happening in a period where some Suppliers were failing/ defaulting on their accounts. If a party were to fail, they would not be able to settle their invoices. Good credit assurance was ineffective in this situation. The change under DCP349 limited the time for payment history to be considered from 5 to 3 years. This aimed to incentivise parties to achieve a good credit rating under a major recognised credit provider (E.g. Moody's).

JR presented a visual graph to the Workgroup that explained the good credit period in simple terms. This graph showed a line rising diagonally over a 5-year period. Prior to DCP349, there was a glide path up to 5 years for building a good credit rating. DCP349 limited this period to 3 years. After that time, the calculation ceased to improve a credit rating on its own. After 3 years a Supplier would need a recognised credit rating. JR added that DCP349 had been successful at changing the code credit rules. The Chair asked about the change after the 3-year period, where the line starts to decline rather than flatline. JR informed the Chair that this was the incentive to acquire a good credit rating. JR added that this was built into the methodology and that IGT164 would work alongside IGT132VV financing. Michelle Brown (MB) thanked JR for the clarification. The Proposer asked if there were any more questions on the alignment of IGT164. No questions were raised.

TL took the Workgroup through the IGT164 draft Workgroup Report. JR noted that the timescales for this Modification were important. If IGT164 were to be implemented at the same time as IGT132VV, there would be no period where parties could accumulate good payment history. JR did not expect this Modification to take longer to be implemented and so it could be implemented at the same time as IGT132VV.

TL asked if there were any questions about the intent of the Modification. Claire Louise Roberts (CR) thanked JR for this presentation of the Modification. JR told the Workgroup that as the Proposer they believed that the alignment of this Modification was a driver of change to credit rules.

The Workgroup members agreed that there was benefit in the alignment of the IGT132VV solution and DCP349. TL asked the Workgroup if there were any other comments, to which there were none.

JR asked if it was fair to say that this was a straightforward change to align IGT132VV rules to be implemented in June with the DCUSA rules that they were based on. JR added that a dual fuel Supplier would need to negotiate two different processes under the credit rules without the implementation of IGT164. They asked if the Workgroup needed to look more closely at DCP349. There were no further questions regarding the intent of this Modification or with DCP349. TL informed the Workgroup that two meetings had been scheduled to discuss this Modification, but that one meeting may be sufficient to review the entire Workgroup Report. The Proposer told Workgroup that they believed that this Modification could be addressed in a single Workgroup meeting.

#### Governance

TL informed the Workgroup that the Proposer believes that this Modification should be progressed as a Self-Governance Modification Proposal. They noted that the Proposer cited that this Modification was unlikely to discriminate or have a material impact on the end consumer. It worked to align with industry Codes to ensure a common provision across the industry for the credit rules. TL asked if there were any disagreements with the view that the Modification should proceed under Self-Governance. CR asked if DCP349 was approved by the Authority. The Chair informed CR that it had been approved as an Authority Decision Modification Proposal. CR also asked if this Modification would impact smaller Suppliers. The Chair said that it did impact them but it would allow them time to build a credit rating. If a Supplier could not build this good credit rating they would be impacted by a worse rating which would incentivise them to improve their situation. JR agreed with this view, adding that the rules could impact any party that did not have a credit rating. A Supplier in a larger group would still receive an individual rating. This would essentially impact all Suppliers. The Chair added that a smaller Supplier that was not supported by a group could be impacted more but not necessarily in a detrimental way. JR responded that any party without a recognized credit rating would need to ensure that their finances are more robust. They added that this was just one element and not the whole aspect of the methodology. The Chair asked CR if they agreed with the Self-Governance approach. CR agreed. The Workgroup agreed unanimously that this Modification should proceed under Self-Governance.

#### Impacts

TL informed the Workgroup that the Proposer cited no impacts on any SCRs or other industry projects as well as no impacts at a consumer level. The Chair asked if the Workgroup supported the impacts as cited by the Proposer. JR noted that this alignment Modification would incentivise a party to have more robust finances in the long term and that this would be better for consumers as well. The Chair

noted that this depended on whether or not the failure of any party would have negative costs on consumers. JR added that there may be an impact because of the process of debt recovery. If a Supplier has more robust finances and avoided failure, then there would be no impact on consumers. The Chair noted that the cost of credit goes into party charges. They added that framing the impact of the Modification as mitigating the risk of the cost of failure would be clearer. CH agreed that this Modification would help to reduce the risk of market or Supplier failure and would in turn reduce the risk of those costs negatively affecting consumers. The Chair noted that this was then a balance to keep between accumulating a credit score and protecting consumers.

TL presented the annotated Workgroup Report notes to the Workgroup. The Chair asked if the Workgroup agreed with the annotations that TL added to the Workgroup Report Draft. TL asked the Workgroup to confirm if they believed that there was a possible positive impact from IGT164. CH said that this depended on whether the mitigated risk outweighed the cost of the credit arrangements that the IGT UNC had put in place, which was impossible to know. JR added that this would depend on the costs being passed on to the consumer.

The Chair presented some quotations from DCP349 noting that DCP349 explicitly aligned itself with UNC principles. In this case the IGT UNC aligned itself with DCUSA, which then aligned itself with the UNC. The Chair informed the Workgroup that the portion that they read out came from the “how” section of the Change Report.

TL asked if the Modification could be seen as having a positive impact as it may mitigate the failure of parties and provide an incentive to have more robust financial processes in place. JR advised that the Modification should not be framed as directly responsible for a party failure and that a failure would not be as a result of this change. TL noted that credit was being brought in under IGT132VV rather than this Modification. The Chair added that credit arrangements do not induce parties to fail, they exist to provide protection against an organisation failing. The cost of failing parties has found its way to consumers under the UNC. The Chair added that this arrangement allows a party that is failing to fail faster, without allowing it to accumulate bad debt. This means that this Modification would reduce the final cost of failure after the fact.

The Chair noted that failure in the IGT UNC would not ultimately find its way to consumers, but a UNC failure would affect consumers. JR clarified that a recovery through Gas Distribution Networks (GDNs) has been brought into the gas sector. A party seeking recovery of debt would have to prove that they have mitigated the chance or loss of debt to Ofgem. JR highlighted to the Workgroup a conversation with Jennifer Semple (JS) at the February Modification Panel meeting, whereby it was highlighted that Ofgem’s preference would be for credit to be mandatory. JR advised that the current system would help with cost recovery. This would be an incentive to IGTs to have more robust processes and therefore mandating was not entirely necessary.

TL asked the Workgroup if the comments in the report should be higher level with the detail kept in the Workgroup minutes. JR believed that the report should be simplified with regards to a Supplier

failure leading to consumer costs as the Modification may mitigate failure by incentivising parties to have stronger financial arrangements in place.

TL took the Workgroup through the Modification discussion comments. TL asked if the Workgroup had any concluding thoughts and if the Workgroup felt that there was a positive impact on consumers. JR suggested that there could be a positive impact on consumers, depending on the party. The Chair added that this Modification could reduce risk further, and so it could potentially be positive. JR believed that it does reduce the risk of a Supplier failure. CH added that this Modification should reduce the risk of a negative impact. TL asked if it reduced the potential of failure or the impact of failure. JR responded that it could reduce the likelihood of failure and increased costs to consumers resulting from a failure. TL amended the Workgroup report to say that the Modification could have a potential positive impact on consumers. TL asked if there were any disagreements with the final views reflected in the report. None were raised by the Workgroup. TL asked if there were any other comments on the impacts section of the Workgroup report. None were raised.

The Workgroup agreed that the impacts as set out in the Workgroup Report were accurate and reflective.

#### Objectives

TL advised the Workgroup that the Proposer cited a positive impact on Objective (F) “Promotion of Efficiency in the implementation and administration of the Code” for this Modification. As a housekeeping Modification it would implement a cohesive and clear approach to the IGT UNC credit cover arrangements. TL asked the Workgroup if they felt that there was an impact on any of the other Objectives. The Workgroup agreed unanimously that Objective (F) should be cited for impact.

#### Implementation

TL informed the Workgroup that Proposer suggests that this Modification has same implementation date as IGT132VV and IGT163. They noted that at the latest, this Modification should be implemented no more than 24 months after IGT132VV. TL suggested that the Workgroup Report specify such an Implementation approach if there is agreement by the Workgroup. The Workgroup unanimously agreed with the proposed implementation approach as set out in the Workgroup Report.

#### Legal Text

TL informed the Workgroup that this Legal Text was written with the same approach as IGT163, whereby the black baseline text was the approved IGT132VV Legal Drafting and the amendments that were to be introduced under IGT164 being in red. There were no comments on the Legal Drafting. The Workgroup unanimously agreed that the drafting delivered the intent of IGT164.

#### Recommendations

TL verified that the Workgroup concluded that the Modification should proceed under Self-Governance. TL asked the Workgroup if there were any disagreements with this recommendation.



None were raised. TL asked if there were any final questions and comments on IGT164. None were raised and the Workgroup unanimously agreed that this Modification be issued for consultation.

TL told Workgroup that the Workgroup Report would go to the March IGT UNC Modification Panel meeting, following the same timetable as IGT163 and would have the standard 15 working day consultation before a final consideration by the Panel at the April meeting.

## **REVIEWS**

### **7. [RG005 – IGT UNC Review of Impacts resulting from Faster switching Programme arrangements](#)**

#### **Summary**

The Chair provided a summary of RG005, noting that it was raised to review of impacts of Ofgem's faster switching programme. They noted that in the previous Workgroup it was discovered that the ToR prevented the Workgroup from properly discussing this item as the ToR required 2 Shippers and 2 IGTs to be present, and there were not enough Shippers in the meeting.

The Chair advised that should quoracy continue to be an issue it could be taken to the Panel, who could be asked if they believe it necessary to have two Shippers present. If they do not feel this is necessary the ToR could be amended to reduce it to 1 Shipper representative. Chair added that there was no further work required with regards to the items contained in RG005 as all of the required Modifications had been raised and implemented. The purpose of today was to make sure that the Workgroup felt comfortable that the documentation reflects the discussions that were had by the group.

JR asked if it would violate quoracy rules for the Code Administrator to reach out to all Shippers via correspondence to obtain views on the Review Report. The Chair advised that this could be done.

The Chair asked if the Workgroup had read through the RG005 Review Report. Members told the Chair that they had not had a chance to go through the Report in detail. The Chair explained the contents of the Report. They added that the areas for review are contained in the highlighted sections of the Report. The history of the document explained that this Review Group was started to look at the implementation of the Retail Energy Code (REC) and the Central Switching Service (CSS). This Review Group predated the SCRs, which were raised by Ofgem. The summary of Review Group needed to evolve to consider the asks of the IGT UNC. There were 3 strands inside the Review Group:

1. The Impacts of CSS delivery;
2. To Consider the data requirements for the REC data catalogue. There was an indication that REC would be the lead code on data items. The Review Group needed to identify if any items from the IGT UNC needed to go into the REC catalogue. However, none were found; and
3. To Consider the implications of the SPAA (Supply Point Administration Agreement) being subsumed into the REC. This would make the REC a dual-fuel Code which would fulfil what



SPAA did before. It was important to consider that REC would be the only code in the retail space.

The Chair told the Workgroup that strands 1 and 3 required drafting which was used for the Code consolidation and Faster Switching Modifications. The Panel had agreed to leave the Review.

### Impacts and Costs

The Chair took the Workgroup through the impacts and costs section of the Report, asking for Workgroup views on the content of this section.

The Chair referenced UK Link Strand 1, noting that there was a clear implication of impact. The Chair asked ER if the data catalogue had elements that impacted UK Link but not IGT UNC specifically. ER responded that they would have to look more closely at these impacts within RG005. The Chair gave some historical background information on the consolidation of REC. They believed that UK Link would be impacted.

The Workgroup briefly considered the impacts and costs but agreed that it would be difficult to fully discuss and agree on them in the meeting.

### Next Steps

The Chair proposed that the Code Administrator complete the impacts and costs section of the Review Report and then issue to industry for a period of review. They suggested that any comments be reviewed and considered by the Code Administrator and a final version be brought to the next available Workgroup meeting for a final review.

Oorlagh Chapman (OC) agreed that the rest of the report should be completed by the Code Administrator and considered by wider industry before being brought to Workgroup. JR asked if the Workgroup was deciding on the impacts after the effect. The Chair responded that this was the original intent of the meeting today. The Chair continued by saying that the Code Administrator would complete this report in the following week, to be sent to the industry for review. The Chair asked the Workgroup if two weeks was enough time to do the review. JR suggested a two-week approach and then to send this Review Group Report to the April Workgroup Meeting. The Chair asked if there were any questions from the Workgroup with regards to the process of RG005. The Chair emphasised that this report would be completed by the Code Administrator and sent out for a consultation of a minimum of two weeks. Assuming that there were no major comments on the Report, this Review Group would go to the April Modification Panel, with a recommendation for closure at the Panel. The Chair asked if the Workgroup agreed with this approach. The Workgroup agreed unanimously. The Chair reminded Ellie Rogers (ER) that as CDSP the report would need to be reviewed by them before the Panel.

## **8. Cross Code Modification Implications Tracker**

TL provided the Workgroup with the following updates:

- UNC0841– Introduction and cost efficiency and transparency requirements for the CDSP budget.** TL told the Workgroup that as Code Administrator they would check if there was a Code impact from this UNC Modification as while the IGT UNC is high level with regards to CDSP activities there is some reference to services. OC told the Workgroup that the changes could be quite substantial and might require an IGT UNC Modification. From a Code perspective, having transparency is important. TL added that there might be an impact at a party level which they might want to check.
- UNC0831(A) – Allocation of LDZ UIG from Brook Green Trading.** TL informed the Workgroup an alternate was raised to UNC0831 and that both Modifications had been added to the tracker for a review. They noted that the alternate looks to apply the solution specifically to Product Classes 3 and 4. ER informed the Workgroup that the Legal Drafting had been updated to say that there would be no impact on the IGT UNC.

#### IGT UNC Cross Code Working

JR asked about the operational impact of UNC0831(A) on IGT sites. ER responded that the Modification was not intended to carve out IGT sites, because IGT sites are included in the AUGER (Allocation of Unaccounted for Gas Export) process. Instead, the Modification pointed directly to the UNC and subsequently would make changes to the IGT UNC. They added that this process was being discussed, and that the Proposer mentioned that this should not matter. CH responded that simply taking their word that there would be no other impacts was not enough if they wanted IGT supply points included in the Modification, there should be a positive response from the IGT UNC to say that they can be included and whether they would impact the Code or not. ER suggested that IGTs attend the UNC Workgroup to see how it was being discussed. CH said that this was a governance issue between UNC and IGT UNC, and that Cross-Code engagement was not clearly working. ER suggested that the Workgroup have a look at the Legal Drafting when it is provided to say if it is needed. JR said that the default position by Xoserve for system changes should be that where a UNC change is raised it should only be applicable to GDN sites until there is agreement that it should apply to IGT sites. Therefore, it is important to ask if it is right that IGT sites are not included.

ER advised that due to existing cross referencing the governance should already be covered through the Legal Drafting. OC added that although IGT UNC refers to a lot of UNC, it needs to be called out/questioned whether a Modification is just a GDN change or if it should apply to IGTs, even where there may be a governance link. JR said this was discussed at the February 2023 Workgroup meeting as a governance issue where there is a decoupling at the CDSP between whether or not the change is applicable to the GDN sites or the IGT sites as well. They went further and said it was a disregard of the IGT UNC. They added that the CDSP should clarify what falls under the GDN sites and ask if IGT sites should be included as well when doing a Rough Order of Magnitude (ROM). JR believed that there was missing governance in this situation. They added that IGTs should absolutely be considered. JR was concerned that there was an assumption with regards to IGT sites and the impacts of UNC change. They disagreed with the assumption that UNC change should automatically apply to IGT sites.

OC suggested that a change to UNC documentation might be needed to ensure impacts on IGTs is clearly laid out. JR added that this is considered within the UNC Proposal Form. OC said this change proposal is explicit for GDN sites. ER said that this would depend on how the Codes are linked. CH contributed that UNC governance can only cover GDN sites and does not allow IGT sites to be included. ER responded that IGTs can be brought up by UNC because IGT will be pointing at a reference in the UNC. ER brought up the vacant sites' Modification, UNC0819. In this case, a brand-new Modification was drafted about vacant sites, with no equivalent being raised under the IGT UNC. Therefore, the CDSP assumed that it excluded IGT sites by default. JR advised that the CDSP should be checking this before making assumptions about whether IGT sites are to be excluded or not. When a UNC Modification is received by the CDSP for the production of a ROM the CDSP need to ask if it is applicable to GDN sites or to IGT sites as well. JR added that this cannot be an assumption but rather an affirmation.

TL noted that as Code Administrator current UNC Modifications are added to the IGT UNC Cross-Code tracker even when there is no direct Code impact to highlight to IGTs that they may want to review any potential party level impact. JR noted the suggested changes to the tracker, which were being presented to the Workgroup today, which should hopefully help with documenting future assessments of UNC Changes. CH said that IGT UNC parties should have final say on whether a Modification will be needed to also change the IGT UNC for a UNC Modification.

JR asked ER if they believed that the IGT UNC needs to make a more formal demand to Xoserve with regards to how they consider IGT impacts. ER suggested that the IGT UNC raise this with the Joint Office of Gas Transporters (JO), rather than inform Xoserve. They added that Xoserve would only look at the Modification at a ROM level and in line with the DSC change process. They wanted to avoid agreeing and working on system changes for GDNs where it turned out that IGTs also needed to be included after the Modification had been implemented and another Modification needs to be rushed through. CH said that they did not see the issue with automatically excluding the IGTs in a ROM situation. ER added that the ROM production is done at a very high level. CH stated that the current process creates a disadvantage for IGTs as the IGT UNC is not given due consideration, and that changes are being put through by Xoserve which IGTs have not explicitly agreed to. JR said that this is a change to the mindset of parties involved. They believe that anyone raising a change to the UNC should consider if their change should also apply to the IGT sites. JR gave an example situation where a change to IGT UNC did not consider the UNC, this would be considered a major problem because impact on the GDNs had not been considered.

OC asked JR if this governance issue should be codified in the UNC to state explicitly that IGTs should be formally considered as part of the development of a UNC Modification. JR added that the CDSP should not think that a change requested by a customer segment should not be assumed to apply to another customer segment.

The Chair suggested that these issues of Cross-Code working be added to the Known Issues Register of the IGT UNC. They also suggested an agenda item for April Workstream meeting be

added so that the Workgroup could discuss this matter in more detail. JR supported this as an agenda item at a future Workstream meeting and requested that a member of the Joint Office and the CDSP be present. TL added that they could bring this up at the next CCSG meeting to ensure the Joint Office are aware. JR agreed and emphasised that the lack of clarity has not been addressed at these meetings in the past. The Chair acknowledged that this had been an ongoing issue. When an assessment was made about the IGT UNC, it was made by a group who did not understand the IGT UNC and IGTs. . OC suggested that there should be a process where a UNC Modification Proposer highlights impacts on IGTs in an appropriate time. JR suggested that UNC Proposers be invited to attend IGT UNC Workgroup meetings where impacts can be discussed. However, where a Proposer can say for certain there will be no impact, they can choose not to attend.

The Chair asked the Workgroup if they were happy with the following approach:

- Add agenda item to the April Workgroup meeting to discuss Cross-Code working further;
- Ensure the Joint Office and Xoserve are invited to that meeting; and
- Have this issue highlighted by TL at the next CCSG meeting.

The Workgroup agreed with this approach.

#### Watch List

TL provided the Workgroup with the following updates:

- **UNC0819 - Establishing/Amending a Gas Vacant Site Process:** The Workgroup Report would be taken to the UNC Panel in May, following amendments that were made February.
- **UNC0816 - Update to AQ Correction process:** The Workgroup Report is now due to be presented to UNC Panel in May.
- **UNC0815 - DSC Committee Quoracy.** This Modification has been approved and there is no direct impact on the IGT UNC, though IGT UNC Parties are impacted by the change in quoracy rules under the UNC.
- **UNC0813 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers.** This Modification is now with Ofgem for decision following a recommendation for implementation from the February UNC Panel.

#### IGT UNC Equivalent Modifications

- **UNC0664 - Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4 (adopted).** Both UNC0644 and equivalent Modification IGT145S were implemented in February (24<sup>th</sup> and 25<sup>th</sup> respectively). Both Modifications would be removed from the tracker from next month.

#### Review Groups

- **UNC0828R - Introduction of an Independent Shrinkage Expert.** TL told Workgroup that they are meeting the Proposer regarding IGT impacts. They added that further clarity around

the impacts of this Modification were required and that the UNC Proposer needed to be made aware that there is no governance / methodology around shrinkage in the IGT UNC.

- **UNC0812R – Review of Alternatives to “Must Read” Arrangements.** TL advised the Workgroup that there was a change in a key date to 21<sup>st</sup> July 2023. They reminded members that the intention was not for the review to make changes effecting IGTs but rather that it was on the tracker because the review was considering IGT processes.

#### **9. IGT UNC Known Issues Register**

TL told Workgroup that there were no changes to the Known issues Register in the last month, and that the discussion on Cross-Code engagement would be added to the following month. The Chair asked if there were any more comments. No comments were raised.

**The next Workgroup meeting is scheduled for Thursday 13<sup>th</sup> April 2023.**

DRAFT

**Annex 1 – Actions Table**

Reference	Action	Owner	Status
23/02 – 01	<i>CA to circulate the Terms of Reference for the RG005 Review Group alongside the RG005 Report.</i>	<i>Code Administrator</i>	<i>Closed</i>
23/02 – 02	<i>CA to approach the Proposer to determine considerations up to this point for IGTs and the IGT UNC with regards to UNC0828R – Introduction of an Independent Shrinkage Expert.</i>	<i>Code Administrator</i>	<i>Closed</i>
23/02 – 03	<i>CA to review the current Cross Code Tracker and develop an example as to how to capture historic information regarding assessing UNC Modifications.</i>	<i>Code Administrator</i>	<i>Closed</i>
23/03 – 01	<i>All Workgroup members to review RG005 Review Group Report prior to the April Workgroup meeting</i>	<i>Code Parties</i>	<i>Open</i>

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