

Review Group Report	At what stage is this document in the process?
RG005: IGT UNC Review of Impacts resulting from the Faster Switching Programme arrangements	01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification Report
Purpose of Request: This Proposal seeks to undertake a review of the IGT UNC with the aim of identifying Consequential Changes required as a result of development of the REC.	
	The Panel will consider this Review Group Report on 26th April 2023. The Panel will consider the recommendations and determine the appropriate next steps.
	High Impact: Pipeline Users, Pipeline Operators
	Medium Impact: N/A
	Low Impact: N/A

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This document is a Workgroup report which recommends that Review Group 005 has now completed its requested action. This will be presented to the Panel on 26th April 2023. The Panel will consider the Workgroups recommendations and conclusions with respect to any subsequent modifications needed in light of the review groups findings.		

1 Request Summary

Why is the Request being made?

In November 2015, Ofgem launched a Significant Code Review (SCR) to move to faster, more reliable and cost-effective switching. Since that time Ofgem have made a number of requests of Energy Sector Codes as part of the on-going work under Ofgem's Switching Programme. This review is designed to capture those requests, as they arise, and consider the impacts on the IGT UNC in their entirety. It is therefore anticipated that new 'work strands' will be added over time.

Scope

The first request came in autumn 2018, when industry codes were asked to identify the consequential changes that would be required as a result of the introduction of the new Central Switching Service (CSS) and the Retail Energy Code. **(Work strand 1)**

The second request came in autumn 2019. Ofgem published the [Retail Energy Code: Technical Specification approach consultation](#). Parties were asked to consider whether there are any IGT UNC specific data items or flows that should also be considered within the approach, beyond the gas data flow catalogues currently available and are there any IGT data items or data flows that are not in the UK Link File Formats that should also be included within scope of the REC Metadata work? **(Work strand 2)**

The third request also came in autumn 2019, with the launch of the [Retail Code Consolidation](#) SCR. Parties were asked to consider the consequential changes / impacts of the consolidation of the Supply Point Administration System (SPAA) and other codes into the Retail Energy Code (REC). **(Work strand 3)**

Each strand of work has been taken separately and independently and added to the work of this Review Request.

Strand 1:

With Ofgem directing the various Industry Codes to review for any consequential changes and impacts to their current state with the development of the REC (Retail Energy Code), the IGT UNC requires a Review Group to assess these potential impacts.

The Review Group will aim to produce a report that will identify the areas of the IGT UNC which are impacted with the introduction of the REC and thus will need to consider the following:

- Areas to transition into the REC, either on their own or alongside UNC obligations;
- Areas to remain in the IGT UNC but require updating as a result;
- Areas of the IGT UNC remaining, but with similar topics transferring away from the UNC. I.e. unique obligations within the IGT UNC which are required to remain so; and
- References between the IGT UNC and UNC codes which may be displaced due to obligations transferring to the REC.

The Review Group would need to be conscious of other codes equivalent consequential change reviews in assessing the areas of impact on the IGT UNC, particularly that of the UNC.

Strand 2:

Ofgem have highlighted that they are developing a new Data Catalogue which will incorporate all metadata governance into one under the REC. This will include the Central Switching Service

Interface Specification, the Electricity Data Transfer Catalogue, the Gas RGMA Data Flow Catalogue, the Gas Supplier Data Flow Catalogue and the Gas UK Link Manual.

The Review Group will need to review the IGT UNC (including all ancillary, guidance, process documents and their associated forms) to ascertain if there are any specific data items or flows that should be considered for inclusion within the scope of the REC Data Catalogue.

For the avoidance of doubt Gas Transporter requests governed outside the IGT UNC (such as the GT1 governed through the Energy Networks Association (ENA)) are not within the scope of this review.

Strand 3:

With Ofgem releasing the Retail Code Consolidation Significant Code Review on the 29th November 2019, the IGT UNC requires the Review Group to assess any potential impacts.

The Review Group will need to assess the consequential impacts of the Supply Point Administration Agreement (SPAA) and other retail codes being consolidated into the REC on the IGT UNC.

It is proposed the scope of this review (incorporating all strands) will be the whole of the IGT UNC (including all ancillary, guidance, process documents and their associated forms), its alignment with the UNC and the areas of transition into the REC.

It will be important to consider and assess the areas which will need to remain unique and separate from the UNC's own approach to consequential changes. For example, the IGT bulk registration process, IGT invoicing and, potentially, metering provision.

Impacts & Costs

No direct impacts or costs are envisaged as a result of the proposed work for this review group (i.e. for all strands), but there are likely to be impacts which coincide with the implementation (under different versions) of the REC and as Ofgem's SCRs (Significant Code Reviews) conclude, and the resulting modification/s required to alter the current governance and administrative arrangements are implemented.

Recommendations

Strand 1:

The objective of this request is to produce a recommendation to the IGT UNC Modification Panel whereby the proposal should be referred to a Workgroup as this will enable a thorough and collaborative review of the code and consequential impacts to it as a result of Faster Switching and the introduction of the REC.

Strand 2:

The objective of this request is to recommend to the IGT UNC Panel that this review should be taken forward by Workgroup members to discuss and facilitate the tasks required to review the IGT UNC (including all ancillary, guidance, process documents and their associated forms) to ascertain if there are any specific data items or flows that should be considered for inclusion within the scope of the REC Data Catalogue.

Strand 3:

The objective of this request is to recommend to the IGT UNC Panel that this review should be taken forward by Workgroup members to discuss and facilitate the tasks required to review the IGT UNC (including all ancillary, guidance, process documents and their associated forms) to ascertain the

consequential impacts of the Supply Point Administration Agreement (SPAA) and other retail codes being consolidated into the REC on the IGT UNC.

Additional Information

The Review Group will need to also consider consequential work being undertaken under the UNC for the same reasons and where the two codes can possibly be made to align. Therefore, while the group will be kept separate from the UNC's similar workgroup, there will be a requirement for updates and dialogue between and regarding the two codes.

Parties should be mindful that consequential changes to the IGT UNC may require a legal view.

The group will also need to remain mindful of other consequential change developments, and the timescales associated with them, which may require additional workgroups over and above the normal and agreed schedule. Elements such as:

Strand 1:

- 08/01/19 – IGT UNC Mod Workstream and initial kick off with considerations of key areas to cover
- Mid-January – BUUK and other IGT, and Gemserv representatives to carry out a page turn exercise of the IGT UNC to assess areas of consequential change
- Mid to Late January - High level UNC changes to be shared with IGTs
- End of January/Early February - UNC Legal drafting draft from Consequential Changes provided to IGT UNC
- 05/02/19 – IGT UNC Mod Workstream with BUUK and Gemserv to present initial findings to the group for discussion
- Mid-February – BUUK and other IGT and Gemserv representatives to continue with a page turn exercise of the IGT UNC (if second workshop required)
- 18/02/19 – Code representatives to present consequential changes to RDUG, with full requirements of delivery to be clarified by Ofgem (Jon Dixon)
- 02/03/19 – IGT UNC Mod Workstream with group to collate views to be presented at the next Panel meeting
- 25/03/19 – Code representatives to present legal drafting of proposed changes to RDUG
- End of March – All wrapped up and with final report, changes and legal drafting to Ofgem

Strand 2:

- IGT UNC data items or flows to be identified for consideration for inclusion within the REC Data Catalogue, and to be provided to Ofgem by the end of March 2020.

Strand 3:

- As part of the delivery of the Switching SCR, where Supplier switching via Shippers was to be removed from the UNC, the UNC was to be re-ordered for the remaining content. The IGT UNC equivalent review was carried out within Work Strand 1. UNC Modification 0708 was raised to bring forward the re-ordering of the code to Spring 2020, rather than waiting for the re-ordering to be implemented as part of the SCR modification. It has been agreed with Ofgem that the Retail Code Consolidation SCR work for both the UNC and the IGT UNC should be based on the legal drafting of the re-ordered UNC. The work required in the IGT UNC as a result of UNC0708 will be progressed separately from the work required for Strand 3 and under the IGT UNC Modification –

‘Alignment to the IGT UNC in Advance of Faster Switching.’ Both modifications will be implemented in 2020. However, the availability of the baselined legal drafting for the UNC and IGT UNC for these modifications is recognised as being a dependency on the IGT UNC for the provision of baselined legal drafting for the SCR modifications and does NOT fall under the remit of this Review. It is a working assumption that the baselined UNC legal drafting for UNC0708, will have been implemented in 2020 and will therefore be current at the time of the implementation of both the Faster Switching SCR and the Retail Code Consolidation SCR.

- Ofgem sent a letter to the IGT UNC Panel in January 2020, describing how they propose to manage the SCR’s and modifications which might impact the SCR’s, and that might be raised in the interim. The letter also asked how the Panel proposed to identify the requirements on the IGT UNC as a result of the Retail Code Consolidation SCR. The Panel approved a plan, which was submitted to Ofgem. The plan also identified risks and issues, with suggested mitigations. **A commitment was made to Ofgem to undertake the work of this strand 3 within that timetable.** The plan, risks, issues and mitigations submitted are available in the link below.

Workgroup Updates

Strand 1

June 2019

The above programme is as set out in the [Review Group Request](#). As the work was progressed, it was clear that the original deadline of the end of March 2019 would not be met. The main reason for this was that there were delays in the delivery of the UNC changes with the final UNC version not being delivered until the 4th June 2019. As this was after the second deadline date set by Ofgem, the actual changes made to the IGT UNC were based on a version of the UNC delivered on the 25th April 2019.

In addition to the above schedule the following meetings were also completed:

- **16/04/2019:** Code representative attended UNC workstream meeting at Dentons at which the changes to the IGT UNC were presented to Shippers alongside the UNC changes;
- **14/05/2019:** RG005 teleconference held to have a final sign off before documentation was sent to Ofgem; and
- **23/05/2019:** Final documentation sent to Ofgem regarding version 10.9 of the IGT UNC (Retail Energy Code (REC) version) and the supplementary document highlighting the changes made.

After this a couple of very minor changes were identified against the last UNC version and the Code Administrator consulted with Ofgem on how they wished these changes to be managed.

July 2019

It was confirmed that Ofgem had received the legal drafting for the IGT UNC and that it had been included in the Ofgem's Faster Switching Programme and REC consultation.

The Workgroup recommended keeping the Review Group open to address any additional work that might come from the Faster Switching Programme.

December 2019

The Workgroup were made aware of Modification [UNC0708 – Re-ordering of the UNC in advance of Faster Switching](#). This Modification looked to re-order the UNC ahead of the delivery of the Faster Switching Programme. It was highlighted that the UNC reordering was required to make the maintenance of the consequential changes required for the faster switching SCR easier.

The reordering of the UNC had been incorporated within the Faster Switching legal drafting submitted by the UNC to Ofgem. However the UNC decided that the reordering of the Code should be performed in advance of the Faster Switching Programme and UNC0708 had been raised to do this. The intention of UNC0708 was to ensure that the Code was reordered to mirror the ordering of the UNC within the consequential changes drafting.

As the IGT UNC consequential changes drafting for the Faster Switching SCR was based on the UNC drafting, the Workgroup was made aware that UNC0708 presented a risk to the IGT UNC drafting and that further work under the IGT UNC for the SCR was required.

January 2020

Following the addition of 2 new work strands to this Review Request, the initial work under the Review Request becomes Strand 1 and is dedicated to the needs of the Faster Switching (FS) SCR.

February 2020

The plan to provide the legal drafting for the Faster Switching (FS) SCR is shared with the Workgroup and provided to Ofgem, following their request and a commitment made by the IGT UNC Panel.

- [Ofgem letter to IGTs requesting timetable – January 2020](#)

A dependency on the progress of UNC0708 was identified as the reordering of the UNC would need to be removed from the first draft of the UNC FS SCR text, providing a new baseline of UNC text from which the IGT UNC FS SCR legal drafting could be derived.

- [Plan for Preparation of SCR Legal drafting Drafting – February 2020](#)

April 2020

[IGT137 – Alignment of the IGT UNC to the UNC in advance of Faster Switching](#) had been raised in response to UNC0708 as the reordering of the UNC would have a significant impact on the IGT UNC, which pointed into the UNC for governance related to the operations of UKLink.

May 2020

The workplan for both the UNC and IGT UNC in relations to the two SCRs was discussed.

- [Switching Programme – IGT UNC Consequential Changes Plan](#)

June 2020

The Authority confirmed that the planned implementation dates for the FS SCR had moved from June 2021 to December 2021.

July 2020

Dave Addison joined the Workgroup to discuss the consequential changes being made in the UNC to which the IGT UNC would be pointing in future.

It was highlighted that there was a risk that the IGT UNC could lag behind because it requires baselined UNC text from which to proceed.

Modifications UNC0708 (UNC Reordering Modification) and IGT137 (IGT UNC Reordering Mirror Modification) were both implemented on Friday 24th July 2020. IGT137 was implemented into version 13.3 of the IGT UNC.

September 2020

[Draft FS SCR Drafting](#)

The Review Group were presented with the FS legal drafting which was a blend of the originally agreed FS legal drafting submitted to Ofgem in 2019 and the latest version of the Code which incorporates the Code re-alignment in version 13.3. It was confirmed that the purpose of this review was to re-confirm the assumptions made to the original FS drafting and established whether any elements were left out.

The Review Group recapped the amendments made to the original drafting noting large areas that have left the Code due to the FS governance now being included in the REC and the Central Switching Service (CSS). It was also highlighted that areas had been added to the Code to incorporate the CSS. A party noted that there were some phraseology issues with referencing, either within the IGT UNC or over to the UNC, in particular in Part C113-19. The Code Administrator acknowledged the challenge and noted that an amendment was required, taking a holistic approach to the phraseology of referencing. It was added that numerous new terminologies had been brought into the IGT UNC by the REC that had not been used in gas before. It was recognised that this was to ensure that there was no fuel bias in a new combined Code. It was noted that parties would need to pay particular attention to these new terms.

The new arrangements for De-Registration, which has replaced the Withdrawal process, were highlighted and it was noted that large scale changes have been made to incorporate this new process.

The Code Administrator noted that there were still some areas of the Code that would need to be further scrutinised to ensure that the cross-over with the UNC was accurate.

September Panel 2020

All drafting was amended post the September Workgroup and the Panel and it was agreed that the updated documents could be forwarded to Ofgem.

- [RG005 – 4 documents dated 22-25/09/2020](#)
- [Draft FS SCR Drafting](#)

October 2021

Ofgem requested that the legal drafting be brought forward as they planned to consult on it in December 2021.

The legal drafting for the IGT UNC had already been completed but there had been updates from Xoserve which were only received in the previous week. It was explained that the legal drafting would be available for the Workgroup meeting in November 2021 and that timescales were extremely tight.

A dedicated release for the Central Switching Service (CSS) was anticipated for around 13th June 2022.

With the REC review, Ofgem initially agreed to consult on the legal drafting which would have been the opportunity for parties to give their views. However, they later amended the process to consult as part of the Modification process.

The aim was to put the legal drafting before the Panel Meeting in November 2021 for it to be agreed upon and sent to Ofgem in time for their December 2021 consultation.

There were approximately 8 different areas of Code that had changed in the UNC

It was highlighted that the timeline was tight and was suggested that it may be worth raising the timing concerns with Ofgem. It was agreed that this might be necessary but that it would be a Panel discussion and hopefully by the time of the October 2021 Panel meeting the depth of the UNC legal drafting changes would be known.

The Workgroup were notified that all the discussions on this matter are going through the Distribution Workgroup under the UNC and the design of this has been worked on over a number of months between

Xoserve and Ofgem as part of the CSS project. For Workgroup members to understand and influence those system changes it would have to be via the UNC.

On 28th October 2021 there would be a UNC Distribution workgroup meeting and it was noted that there would be an agenda item on this matter. All Workgroup members were advised to attend to understand the changes that are going to be happening.

The Workgroup were also informed that Dave Addison would be attending an RDUG (Regulatory Design User Group) meeting under the programme to be held in early November 2021 and that the Chair would be present at the meeting to inform them that the IGT UNC Solution is compatible to what Dave Addison was proposing.

The legal drafting was expected to go out for an Ofgem consultation in December 2021 and that would be the opportunity for IGT parties to indicate their opinion on the approach and the legal drafting etc. The Workgroup meeting members were strongly encouraged to take part in that opportunity as it may be the only opportunity for their input.

It was an Ofgem expectation that if there is a Modification consultation in the SCR Modification process that nothing significant would be raised at that stage, so parties were strongly advised to review what the potential impacts might be on their organisations now, rather than wait and assume there would be another opportunity to raise concerns later on in the process.

An IGT party asserted that a particular area of interest would be the initial registration process and metering.

November 2021

The legal drafting for the IGT UNC was not yet complete and the September 2020 drafting had been applied to the current version of the IGT UNC. These changes amended some definitions, addressed the initiation of a switch by Suppliers and not by Shippers and addressed the governance for the UK Link system and its relationship with the CSS.

The Workgroup were notified that one area had been identified that would be unique to the IGT UNC and that was new connections and initial registration of a supply point. For the UNC, initial registration of a supply point is generally done by the Shipper but for the IGT UNC this is generally by the IGTs. The CSS acknowledges that on some occasions the IGTs and other Transporters will have a requirement to register sites for Suppliers or Shippers and [the governance](#) of this was where the focus should be.

Dave Addison (DA), Xoserve took the Workgroup through the [Xoserve - Ofgem Faster Switching Programme SCR PowerPoint](#). The following areas were discussed, and the following points were made:

- The PowerPoint (from February 2021) highlighted the changes identified as at March 2020 for the implementation of REC v3, which would go live with the CSS in Summer 2022. The PowerPoint focussed on the changes between the March 2020 version and the March 2021 version;
 - It was clarified to the Workgroup that the March 2020 version of the UNC drafting was what the IGT UNC FS drafting (September 2020) was based on and that the Code Administrator for IGT UNC was currently bringing this version up to the March 2021 version;
 - Ofgem's SCR aligns in relation to REC v3;
 - Registration governance would move from the UNC and the IGT UNC to REC and rather than it being led by Shippers it would be led by Suppliers. There were some exclusions but none of the sites in the IGT UNC had been identified as excluded;
 - Meter reading requirements under REC, IGT UNC and UNC were not expected to be the same.
- DA encouraged Workgroup parties to consider exceptions and the circumstances where Shippers

or IGTs would need to access data that is not in their portfolio such as when a Shipper takes over a site; and

- An IGT party highlighted the issue of requiring access to data not in their portfolio in the case of duplicate MPRNs.

It was agreed that the IGT UNC legal drafting would be reviewed at the December 2021 Workgroup and then taken to the December 2021 Panel meeting, before being passed onto Ofgem.

December 2021

The Workgroup were advised that the legal drafting for the IGT UNC had been published ([FS Legal Drafting](#)).

The changes amended some definitions, addressed the initiation of a switch by Suppliers and not by Shippers and addressed the governance for the UK Link system and its relationship with the CSS.

The Workgroup were notified of an issue with regards to the drafting. UNC Modifications, which were anticipated to be implemented and added to Code at a certain point, had been incorporated within the UNC Faster Switching Drafting completed in March 2021. However, the implementation of some of these Modifications had been delayed but the UNC drafting had not been updated to reflect this. This had impacted work on the IGT UNC drafting as the review of the UNC drafting now required some circumnavigating.

The Workgroup were informed that there were some delivery timetables that needed to be clarified with Ofgem, various Code Administrators and Xoserve which have not yet been disclosed. There had been an indication that the SCR Modification may be raised in January 2022 and Ofgem had also hinted that Panel decisions might be returned by March 2022. It was acknowledged that there were challenges with the timetable.

Workgroup attendees were encouraged to read the IGT UNC legal drafting and communicate any issues before the next Workstream meeting.

January 2022

DA gave the Workgroup an update with regards to the SCR which was as follows:

- The SCR would remove the act of registration out of UNC and into the REC;
- Confirmation activity in the UNC would be led by the CSS;
- Settlement elements would remain within the UNC;
- CSS supply points would have new terminology added, i.e. “Definitive Registration Nomination”;
- Version 2 of the SCR text had undergone a lengthy industry presentation process in March 2020, and version 3 had been issued in March 2021;
- The current iteration of the text is version 4;
- Parties were invited to comment on version 4 and that the UNC consultation on the text closed on 6th January 2022; and
- Comments had been received from the Joint Office, mainly with regards to numbering. Comments were also received with regards to the Central Data Service Provider (CDSP) to release protected information.

DA informed the Workgroup that there would be further updates with regard to the New Connections Process

The Workgroup were notified that there would be further changes being made to the legal drafting of IGT UNC in line with information gained from Xoserve and the Joint Office.

It was anticipated that the Workgroup would work through the changes to the legal drafting in the February Workgroup meeting.

February 2022

The Workgroup were informed that the IGT UNC legal drafting for FS is a work in progress and although many alterations have been made the changes were not yet complete.

[The drafting](#) contained a significant amount of cross referencing to the UNC and amendments had been made to UNC sections B, G, M and the relevant annexes.

A second opportunity for the legal drafting to be reviewed was identified as Ofgem were planning to raise an SCR Modification which would have a 4-week consultation period. The SCR Modification was expected to be raised in the Spring.

It was also advised that further changes may continue to be picked up following the implementation of the SCR Modification as there have been a lot of detailed changes and not everything may have been picked up.

The CSS implementation was now expected to be on 18th July 2022.

The Workgroup were invited to comment on the drafting presented.

An IGT party pointed to the legal drafting for IGT UNC Part CI and the removal of clause 2.2(e) (Supply Point Register and site visits) which states: “the RPC Entry Annual Quantity, the Formula Year Annual Quantity, the Rolling Annual Quantity, Formula Year Supply Point Capacity, Rolling Supply Point Capacity and End User Category of the Supply Point”. The party specifically questioned the removal of RPC Entry Annual Quantity and whether UK Link would continue to store the information and how it is populated under the new rules. It was agreed that DA would check the impact on the registration process and provide an update at the next Workgroup meeting.

DA explained that Annex G-1 in the UNC sets out the data that is available to parties at key stages within the registration process. DA advised that Annex G-1 may be removed from the UNC as it is too detailed and changes to it would require a UNC Modification.

DA took the Workgroup through the ‘end to end’ (E2E) Data Services Landscape diagram and notified the Workgroup that the Transporter Initiation Registration has been acknowledged in the CSS and the REC drafting.

March 2022

The Workgroup were informed that Modification [UNC0804 - Consequential UNC changes for Switching SCR \(REC 3.0\)](#) had been raised, that it went to the UNC February 2022 Panel meeting and at that meeting Xoserve informed the Panel that the legal drafting had further amendments to be made and that had resulted in the Modification Consultation being delayed. Since then, UNC0804 had been issued for consultation and was due to close on 1st April 2022.

The IGT UNC legal drafting has a significant number of UNC cross references and therefore the IGT UNC legal drafting would need to be updated based on changes made to UNC0804. The changes being made under UNC0804 were regarding Non-CSS supply points. This did not necessarily affect the IGT UNC text, but it would affect the numbering within the IGT UNC drafting.

DA notified the Workgroup that the original drafting of the UNC text had been on the assumption that the only Non-CSS sites would be NTS directly connected sites, this later transpired not to be the case. Non-

CSS sites are registered using the existing nominations and confirmation files (for Shared Supply Points the Shared Supply Point notification file is used). Those procedures amongst other changes needed to be referenced and as a result there had been changes in sections G, M and B of the UNC.

DA gave the Workgroup a brief summary of the issues that were identified with regards to the SCR drafting in March 2022 and pointed the Workgroup to look at the UNC updated legal drafting for the Faster Switching SCR explanatory note March 2022 document. DA summarised and reviewed the changes in relation to:

- CSS and Non-CSS supply points and Switching (see above);
- Reinstated Sections in G6 for Local Distribution Zone (LDZ) Supply Points;
- Instances that CSS and Non-CSS Transactions apply;
- Amendments to the terminology;
- Implementation of Modification [UNC0728B – LDZ Site 'Shorthaul' charge were correctly referenced](#); and
- Following the acceptance of REC CR-D118 and greater understanding of the Supplier of Last Resort (SoLR) process under REC – exiting elements of Section G 4.2 of the UNC had been reinstated. DA confirmed that the input on Section G regarding Termination and SoLR has been reinstated from Section G 4.2 of the UNC.

It was anticipated that future housekeeping Modifications may need to be raised to deal with minor errors in the legal drafting as the IGT UNC points to the UNC.

DA informed the Workgroup that he did not know what the impact of the new registration process on the Relative Price Control (RPC) Entry Annual Quantity (AQ), but DA presumed that when Xoserve receive a notice to create a Meter Point there is an assessment of that AQ and the AQ would be loaded onto UKLink. DA also stated that:

- CSS does not hold the AQ value and therefore cannot make changes to the AQ value;
- The AQ could get updated via the settlement transaction Detail Registration Nomination (DRN) and the Base Registration Nomination (BRN), although it is unlikely at that stage; and
- There is a reference in the current UNC that states that the AQ value that is provided at Meter Point Creation will prevail for a certain period of time (possibly 9 months).

The Workgroup were informed that Ofgem had published the timetable for the IGT UNC SCR Modification Proposal and that it is anticipated that the Modification will be put to the March 2022 Panel. If time was limited it would be put before the Extraordinary Panel meeting scheduled for 1st April 2022.

The Workgroup were notified that they would not get the opportunity to see the amended legal drafting prior to the Modification being raised, however a marked version of the drafting between the last published version and that raised in the SCR Modification would be published on the IGT UNC website, providing parties an opportunity to see it before the consultation period began.

The Workgroup was notified that post the IGT UNC SCR Modification being implemented, the Review Group Report for RG005 would be brought to the Workgroup for it to be completed. It was not anticipated that it would be brought before the June 2022 Workgroup.

[IGT161 – Consequential IGT UNC changes for Switching SCR \(REC 3.0\)](#), the SCR Modification, was raised by the Authority on 25th March 2022. This signified the conclusion of this work strand.

Strand 2**November 2019**

The Authority presented the [REC Data Specification and UK Link File Formats](#) presentation to the Workgroup. The Authority highlighted that the new REC Data Catalogue would incorporate all metadata under one roof including the CSS Interface Specification, Electricity Data Transfer Catalogue, Gas RGMA Data Flow Catalogue, Gas Supplier Data Flow Catalogue and Gas UK Link Manual. The Authority indicated that the aim of the REC Data Specification was to create a metadata standard and a single energy market data depository.

The Authority explained that the REC Code Manager would manage the end to end processes of the single data depository. The catalogue would explain who the Code owner is and the data items they individually manage.

The Authority wanted to understand if there were any IGT UNC specific data items or flows that should be considered within the REC Data Catalogue. This request led to this Strand 2 of work being added to the RG005 request and for the analysis required to be conducted under its umbrella.

June 2020

The Workgroup identified that these were the areas that should be reviewed for data items that might fall under REC management:

- 'Pipeline Operation Standards of Service Query Management – Operational Guidelines';
- 'IGTs New Connections Domestic Sites Only';
- 'IGT Non-Domestic New Connections Ancillary Document' (PSR processes);
- 'CSEP NExA Table'; and
- 'IGT Transportation Charges Invoice Template Document'.

The Workgroup discussed the potential dependency of whether the REC only concerned Registration data items and, in this scenario, whether certain IGT UNC data items would be excluded. A Shipper party indicated their understanding was that the central data repository would not just include Registration data items, it was meant to provide a holistic view of data. The initial aim was to ensure the use of common language within the industry and, therefore, would include everything. It was noted this has not been presented for some time and clarification was needed on whether the scope had changed. The Workgroup members conceded that clarification was needed to ensure understanding of what is affected by the REC and noted that similar discussions were being had in other Codes concerning what data would need to be included.

An IGT party highlighted that discussions related to strand two were being held in the DSC Contract Management Committee (CoMC) meetings and indicated that these discussions focused on the mastery of the data items under the specific Codes (UNC or REC) and whether this would mean a slight relinquishing of control of data items. It was highlighted that a workshop had taken place in the DSC CoMC which involved parties reviewing data held in the Data Permissions Matrix (DPM) and establishing which would be incorporated into the REC under metadata.

The Workgroup conducted their initial review / analysis, details of which are contained in the [Strand 2 – Initial scoping of Ancillary document and Code \(12/06/2020\)](#) spreadsheet. Nothing was identified that required feeding back to Ofgem.

May 2021

[IGT156 – Retail Code Consolidation SCR](#), SCR Modification, was raised by the Authority on 24th May 2021. This signified the completion of this strand of the Review Group.

Strand 3

January 2020

Following the launch by Ofgem of their Retail Code Consolidation (RCC) SCR towards the end of 2019, this new strand of work was added to the Review Request and was dedicated to the consequential changes needed for the RCC SCR.

February 2020

The plan to provide the legal drafting for the RCC SCR was shared with the Workgroup and provided to Ofgem, following their request and a commitment made by the IGT UNC Panel.

May 2020

The workplan for both the UNC and IGT UNC in relation to the two SCRs was discussed. ([Switching Programme – IGT UNC Consequential Changes Plan](#))

June 2020

It had been confirmed by the Authority that the timetable for the RCC SCR had moved from the original date of April 2021 to September 2021.

August 2020

The Code Administrator confirmed that the latest version of the UNC drafting for the RCC SCR had been reviewed and the current published RCC SCR drafting from Gemserv was based on this text.

IGT UNC Significant Code Review –Legal drafting progress report

The following sections of the document were impacted:

- In Part H System Maintenance and Planning, it was highlighted that terms such as Market Domain Data (MDD) and the SPAA had been removed, as they are to be subsumed along with the MRA, and replaced with the REC;
- In Part K the general section of the IGT UNC, it was noted that the SPAA was only referenced once and had been removed. However, it was anticipated that following the implementation of IGT135 this section would be removed; and
- In Section M of the defined terms in the IGT UNC, references to the SPAA that had been removed were pinpointed.

The initial amendments made to Modification Rules highlighting the additional clauses to Section L 10.1.1 that incorporated the Retail Energy Code Company (RECCo) and the REC Code Manager were summarised. It was explained, this would give those parties permission to raise changes to the IGT UNC along with any Users and Operators, which mirrored the current UNC drafting. It was highlighted that this amendment had also been applied to Section N - UKLink and the CDSP, 1.2.1.

It was queried whether the REC Code Manager and RECCo should make changes to the IGT UNC as they were effectively the same parties. It was further explained that as the REC Manager would be a third party service provider and the RECCo a separate company, they are not considered to be the same.

- [Draft Metering SCR drafting \(07/08/2020\)](#)

The Workgroup reviewed the proposed amendments to the Metering Section in the IGT UNC. The obligations in terms of RGMA were highlighted, which were a part of the SPAA and will be moving under REC governance and secondly the implications for Meter Equipment Managers (MEMs) (formally referred to as Meter Asset Managers (MAMs)) and Meter Reading Agents (MRAs) that have been signposted as parties that will fall under REC governance in future.

It was noted that this would be a new concept for Gas Governance as these roles have not been subject to governance so far, unlike electricity governance. It was further explained that Metering within the IGT UNC is slightly different as, unlike the UNC, Metering had not been 'unbundled' from the IGT UNC. Parties were still able to obtain Metering Services under the IGT UNC.

It was noted that the changes incorporated within the drafting were to introduce the roles of 'Meter Installer' and 'Metering Equipment Manager'. Where these roles provide services required under the IGT UNC, the services would be subject to requirements under the REC. Beyond this there would be no further obligations in Code.

The Workgroup discussed the possible obligations of parties that perform a metering service under the REC and what this could potentially mean. It was noted that this could mean additional governance but as the details of the Metering Schedules within the REC are not yet available this could not be confirmed. The Workgroup noted that this would need to be reviewed with the updated information when it became available.

The Workgroup acknowledged that it was a requirement to submit the drafting as it currently stood to Ofgem for consultation. It was agreed that the submissions would be with caveats connected to the publication of additional information and detail.

September 2020

[IGT UNC Retail Code Consolidation SCR drafting](#)

The Review Group were presented with the latest version of the proposed Legal Drafting which was based on the Legal Drafting produced by the UNC to ensure the two Codes align. It was highlighted that the initial changes proposed in Section G of the UNC were the removal of references to the SPAA and that these would be replaced with REC as per the new arrangements. It was noted that this was the approach taken throughout the Code.

It was highlighted that it had been suggested that the Ofgem consultation for these SCR drafts had been delayed until December 2020, although that had not been officially communicated. It was noted that following the consultation, the legal drafting would be incorporated into Modifications that would be raised by Ofgem and that under the SCR rules would not be controlled by the Code Administrator.

The Review Group were presented with proposed amendments to the following sections:

- **Part K**

It was highlighted that one reference within this section of Code concerning Theft Risk Assessment Service (TRAS) would likely be removed by the IGT135 (Alignment of the IGT UNC Part K and the Data Permissions Matrix) once implemented.

- **Part L**

It was identified that the changes made to this section concerned which parties were eligible to raise Modification in the IGT UNC. This had been amended to reflect that Pipeline users, Pipeline Operators, Third parties, Retail Energy Code Company (RECCo) and the REC Code Manager were able to propose new amendments.

- **Part M**

It was identified that the changes made to this section concerned the removal of the definition of SPAA and TRAS.

- **Part N**

It was outlined that this section would include new defined terms such as the REC Code Manager, REC and RECCo. It was confirmed that the definition of REC pointed to the Data Communication Company (DCC) licence as this was the only place REC is currently defined and that this would be the approach until Ofgem make other licence changes. It was queried what would happen to the definition and permissions to pass data to TRAS if IGT135 is not implemented as the obligations to share data would still exist, albeit not through the SPAA. The Code Administrator noted the challenge and resolved to add in any alternative drafting if IGT135 is not implemented. It was further queried whether IGT135 would be finalised when the RCC Drafting is submitted to the Regulatory Design User Group (RDUG) and Ofgem. The Code Administrator confirmed that IGT135 potentially would not have been finalised by the IGT UNC Panel and noted that it would be useful to discuss this with the Authority regarding whether this could prevent the risk of it being returned to the Review group.

Metering – SCR Drafting

Regarding the RCC, the Review Group was presented with amended clauses concerning Metering under the IGT UNC. It was explained that the current Code requirements would continue to apply, however, the requirements for Meter Installers and Meter Equipment Managers (both new REC defined terms) would fulfil the roles under the IGT UNC and adhere to the requirements of the REC. It was confirmed it had not been stipulated in the REC schedules what those requirements were or whether they would cause a conflict with this drafting. It was queried whether the REC would take precedence over of the IGT UNC in situations of potential conflict. It was expected that this would be the case as the industry has to steer away from Dual-Governance. It was queried whether it had been confirmed that this would definitely be subsumed into the REC or whether this was a risk. It was confirmed that this was a firm assumption.

It was indicated that through discussions with Ofgem, it is apparent that Metering will be discussed in RDUG meetings within the coming months and that the Code Administrator had been invited to attend that meeting. It was queried if the information on Metering that is being discussed at the RDUG meeting would be shared with the Review group or solely discussed at RDUG, as it was identified by parties as a possible obstacle in the metering drafting of the SCR legal drafting. It was agreed that it was unlikely that the metering scheduling would be released before November 2020 Workgroup for discussion. However, it was the intent to review and discuss the published schedules post the November 2020 RDUG meeting.

The Review Group discussed whether it was the interpretation of the RDUG to remove Metering from the IGT UNC, with an IGT party noting that it was essential that Metering remained in the IGT UNC to cover Transporters in the case of last resort meter fits.

It was noted that the Metering drafting had been changed and proceeded at risk as it is based on the assumptions released by Ofgem. It was noted that Ofgem had not directed the Code Administrator to remove Metering from the Code, hence it was being kept in and the pointers to the REC were sufficient and necessary for compliance.

September Panel 2020

All drafting was amended post the Review Group and the Panel agreed that the updated documents could be forwarded to Ofgem as follows:

- [RG005 – 4 documents dated 22-25/09/2020](#)
- [Draft Metering SCR drafting](#)

- [Draft RCC SCR drafting](#)

May 2021

[IGT156 – Retail Code Consolidation SCR](#) Modification was raised by the Authority on 24th May 2021 and this signified the completion of this strand of the Review Group.

Impacts and Costs

Consideration of Wider Industry Impacts

The Review Group noted that some of the Impacts have been updated based on the work carried out to identify changes required to the IGT UNC.

Impacts

Impact on Central Systems and Process	
Central System/Process	Potential impact
UK Link	• Strand 1 – The IGT UNC and therefore UKLink will no longer be the lead system in terms of gas registrations. Registrations will be undertaken by the CSS. UKLink will be informed of progress in the revised process. The Faster Switching SCR and the gas modifications related to it will impact UKLink significantly. • Strand 2 – No impact identified • Strand 3 – No impact identified
Operational Processes	• Strand 1 – Shipper requirements have been identified and the IGT UNC revised to reflect the change in the process. Low impact to some processes for the CDSP. • Strand 2 – No impact identified • Strand 3 – Metering Providers will come under REC governance. This may positively impact information quality or consistency.

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	• Strand 1 – Shipper processes and systems will be impacted significantly by moving gas registration processes into the CSS and under REC governance. • Strand 2 – No impact identified • Strand 3 – No impact identified
Development, capital and operating costs	• Strand 1 – Shipper processes and systems will be impacted significantly by moving gas registration processes into the CSS and under REC governance. This will incur development & possibly capital cost and be largely neutral once for operating costs once implemented.

Impact on Users	
	- Strand 2 – No impact identified - Strand 3 – No impact identified
Contractual risks	Non-identified
Legislative, regulatory and contractual obligations and relationships	IGT UNC obligations will be updated or moved into the REC leading to a greater retail focus. The gas registration process will be governed under the REC and managed through the CSS.

Impact on Transporters	
Area of IGT business	Potential impact
System operation	- Strand 1 – There may be low impacts to IGT process and systems. - Strand 2 – No impact identified - Strand 3 – Low impact to IGTs and IGT Metering Providers as SPAA governed processes are moved from the SPAA to the REC and Metering Providers are included under REC governance.
Development, capital and operating costs	Non-identified
Recovery of costs	Non-identified
Price regulation	Non-identified
Contractual risks	Non-identified
Legislative, regulatory and contractual obligations and relationships	IGT UNC obligations will be updated or moved into the REC leading to a greater retail focus. The gas registration process will be governed under the REC and managed through the CSS.
Standards of service	Non-identified

Impact of the change on Consumer Benefit Areas	
Area	Identified Impact
Improved safety and reliability <i>The changes are being made are to give an improved consumer and retail focus and should (in the longer term) improve the services provided to and the identification of consumers in vulnerable situations.</i> <i>The aspiration for the implementation of the CSS is to allow consumers to switch with greater speed and to access cheaper and better services more easily by supporting competition.</i>	Positive

Lower bills than would otherwise be the case <i>No impacts identified aside from supporting competition.</i>	None
Reduced environmental damage <i>No impacts identified</i>	None
Improved quality of service <i>Improved efficient and effective switching processes are anticipated for all end consumers including the following benefits:</i> • <i>Faster switching</i> • <i>Less errors in the process</i> • <i>Accurate start and end bills</i>	Positive
Benefits for society as a whole <i>No impacts identified</i>	None

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	• RECCo and the REC Manager will be able to raise modifications in the IGT UNC
IGT UNC Panel	• Non-identified
General administration	• The remit of the IGT UNC will be reduced, but the requirements for IGTs and Shippers remain largely the same. • Modifications to the switching process will now be raised in the REC.

Impact on Code	
Code section	Potential impact
All sections	• The IGT UNC continues to point into the UNC for matters dealt with by the CDSP and UKLink. • The switching / registration elements of the IGT UNC will now be initiated by Suppliers under REC governance. • Shipper responsibilities at the time of switching will remain largely the same, although they will no longer have to initiate switching on behalf of suppliers.

Impact on iGT UNC Related Documents and Other Referenced Documents	
Related Document(s)	Potential impact
IGT UNC Ancillary & Guidance Documents	• No impacts identified

Impact on IGT UNC Related Documents and Other Referenced Documents

IGT Network Codes

- No impacts identified

Other Impacts

Item impacted	Potential impact
Security of Supply	• Not applicable
Operation of the Total System	• Not applicable
Industry fragmentation	• Separation/change of obligations as conditions moved or updated between multiple Industry Codes. This will not be without risk.

Review Group Discussions

Post the Review Group's work, the impacts were revised based on the knowledge that was acquired through the evolution of the Switching Programme and the work conducted under this Review Group.

The Code Administrator revised the impacts identified and the Review Group and IGT UNC Parties were given an opportunity to review these, post the March 2023 Review Group through consultation.

2 Terms of Reference

Background

As outlined above, it is proposed to conduct a review of the IGT UNC and how consequential changes will impact the Code with the development of the REC.

Topics for Discussion

- Understanding the objective, which is not to change the intent of code areas, but rather understand and act on consequential changes from Faster Switching and REC;
- Assessment of alternative means to achieve objective such as areas not to be transferred to the REC but potentially updated;
- Assessment of potential impacts of the request; and
- Benefit of alignment with UNC and assessment of legal drafting.

Outputs

Produce a Review Group Report for submission to the Modification Panel, containing the assessment and recommendations of the Review Group.

Composition of Workgroup

The Review Group is open to any party that wishes to attend or participate.

A Review Group meeting will be quorate provided at least two Transporter and two Shipper representatives are present.

Meeting Arrangements

Meetings will be administered by Gemserv and conducted in accordance with the Code Administrator Code of Practice (CACoP).

3 Modification(s)

Potential Modifications needed (December 2019)

The Review Group agreed that there were no further Modifications required to be raised as a result of this Review Group beyond the Modifications raised by Ofgem under the SCR. The Legal drafting developed during the Sub Group work is linked in Appendix 1. There is a summary document (also linked in Appendix 1) which describes the various changes that have been made. At the time it was not known exactly how the Legal Drafting would be implemented but it was expected that this would be via the SCR process under direction from the Authority.

There have been some Fast Track Modifications already raised as a result of the work carried out within this Review Group where some inconsistencies with the UNC were identified as a result of the intensive comparison work carried out between the IGT UNC and the UNC (IGT123F, IGT125F and IGT126F). A further area was identified in connection with Shipper User Verification of Meter Point Isolations. However, no Modification has been raised for this as the Review Group believed it first required a change to the UNC.

Modifications for which legal drafting was provided through the Review Group

[IGT156 – Retail Code Consolidation SCR](#)

- Significant Code Review Modification raised by the Authority on 24th May 2021;
- IGT156 was issued to the Authority for decision on 28th June 2021;
- IGT156 was approved for implementation by the Authority on 9th July 2022; and
- IGT156 was implemented as part of an Extraordinary Release and with effect from 00:01 hours on 1st September 2021, in alignment with the Authority designated Go-Live Date and time.

[IGT161 – Consequential IGT UNC changes for Switching SCR \(REC 3.0\)](#)

- Significant Code Review Modification raised by the Authority on 25th March 2022;
- IGT161 was issued to the Authority for decision on 27th May 2022;
- IGT161 was approved for implementation by the Authority on 17th June 2022; and
- IGT161 was implemented as part of an Extraordinary Release and with effect from 00:01 hours on 18th July 2022, in alignment with the Authority designated CSS Go-Live Date and time.

4 Recommendation

Review Group's Recommendation to Panel

The Workgroup recommends to Panel that:

- the Review Group be closed.

The Review Group believe that RG005 should be closed for the following reasons:

- the legal drafting worked on during the review has been used within two SCR Modifications;
- the two relevant SCRs have been implemented and closed; and
- sufficient time is deemed to have past to allow for post system and SCR modification implementation issues to be identified.

5 Appendix 1

Below is a list of relevant documents produced by the Review group:

- [IGT UNC Consequential Changes – Summary Document](#)
- [IGT 10.9 REC Version of the IGT UNC – 21052019](#)