

# IGT UNC Modification Panel Meeting Draft Minutes

## Friday 28th July 2023

#### Via teleconference

Attendee	Initials	Organisation	Representing	Notes	
Anne Jackson	AJ	Gemserv	Code Administrator	Chair	
Charlotte Gilbert	CG	BUUK	Observer	Mod Proposer Present for items 6 and 7	
Cher Harris	СН	Indigo Pipelines	Pipeline Operators		
Claire Louise Roberts	CR	Scottish Power	Pipeline Users		
Helen Bevan	НВ	Gemserv	Code Administrator		
Jennifer Semple	JS	Ofgem	Authority		
Jenny Rawlinson	JR	BUUK	Pipeline Operators		
Stuart Monk	SM	MUA Group	Pipeline Operators		
Isaac Moore	IM	Gemserv	Code Administrator	Secretariat	

## 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 had opened a meeting prior to this and held that open for one hour as per Code rules (Part L6.10).

## 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, but there were no further items added.

## 3. Approval of the previous minutes (<u>23-05 and 23-05 Reconvened</u>)

The Chair invited comments on the May 2023 meeting minutes noting that no comments had been received prior to the meeting. No comments were raised during the meeting and the minutes (both standard and reconvened meetings) were approved as a true and accurate account of the meetings.

## 4. Outstanding Actions

The Panel were informed that there was one outstanding action:

23/05 – 01: Jennifer Semple to inform the Ofgem Code Reform policy team of concerns regarding ongoing Shipper representation and quoracy issues at the IGT UNC Panel.

JS informed the Panel that they have spoken to the relevant team and made them aware of the issue of Shipper representation.





## **Code Business**

#### 5. AQ Review Table

The Chair asked the Panel if they were willing to accept the AQ Review tables as recommended by the IGT UNC Workgroup. The Panel unanimously approved the AQ Review Tables to be added to the IGT UNC Code at the February 2024 Release.

## **Modification Business**

# 6. <u>IGT166 – Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting</u> Suspected Theft to Suppliers

The Proposer reminded the Panel of the intent of this Modification, to align the IGT UNC with UNC provisions on Theft of Gas. They specified that this is a housekeeping Modification and that the Legal Text that has been drafted is simply to ensure that the IGT UNC points to the section of the UNC that implements the theft reporting requirements of UNC 0734S - Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers within the UNC.

This Modification was considered by the Workgroup on 13<sup>th</sup> July 2023. The Workgroup recommended to the Panel that this Modification go out for a standard three-week consultation. The Code Administrator informed the Panel that comments from the Workgroup could be found in the Workgroup Report.

The Code Administrator took the Panel through all of the sections of the Workgroup Report and asked for comments and questions, the details of which are documented within the <a href="Draft Modification">Draft Modification</a> Report.

The Chair confirmed that the CDSP did not raise any questions of costs regarding this Modification.

The Panel agreed to take the Final Modification Report as a late paper at the August Panel Meeting in order to bring the modification to a speedier conclusion as the equivalent modification in the UNC has already been implemented.

## **Decisions**

The Panel unanimously agreed that:

- The Modification proceed under self-governance.
- The Modification does not impact a Significant Code Review (SCR).
- The Modification met the relevant objectives indicated by the proposer.
- The Modification should proceed to consultation for a three-week consultation ending 18<sup>th</sup> August 2023.
- The Modification be considered by the Panel on August 25<sup>th</sup> 2023, as "short notice business" and to amend the modification timetable.





# 7. <u>IGT167 – Alignment of the IGT UNC with UNC NGT Demand Side Response</u> Arrangements

The Chair invited the Proposer to present IGT167. This Modification was discussed at the July 2023 Workstream meeting as a "Pre-Modification Discussion". The proposer reiterated that the Modification would allow IGT customers to participate in Demand Side Response procedures proposed by National Gas Transmission and that the Modification would incorporate the business requirements in the following UNC Modifications:

- <u>UNC0822 Urgent Reform of Gas Demand Side Response Arrangements,</u>
- UNC0833 Enabling Demand Side Response (DSR) Market Offers to be made by Non-Trading System Transactions,
- <u>UNC0844 Enabling Direct Contractual Arrangements with Consumers for Demand Side</u>
   Response,
- UNC0845 Enhancements to Demand Side Response (DSR) Arrangements including a D-5 Product.

The Proposer noted that the IGT UNC modification Legal Text simply points to the relevant added sections in the UNC for these modifications.

#### Timetable

The Proposer informed the Panel that National Gas Transmission will send invitations to participate in DSR scheme by 31<sup>st</sup> August 2023 and that in order to allow the shippers and consumers on IGT sites to participate fully, this Modification must be implemented before that date.

The proposer recommended a shortened modification timetable requesting that IGT167 proceed immediately to a shortened consultation of 10 working days ending 11<sup>th</sup> August 2023. The Final Modification Report would then be made available for Panel (as a short notice paper) on 14<sup>th</sup> August before being considered at an extraordinary IGT UNC Panel on 17<sup>th</sup> August 2023. They felt this would be possible as no issues were identified during the pre-modification discussion and the solution to be adopted in the IGT UNC had been fully debated under UNC governance.

SM agreed that the Modification should proceed to a faster timetable to allow IGT site shippers and consumers to participate in the DSR programme.

The Chair asked the Proposer about the dependencies on the implementation of the UNC Modifications. The Proposer clarified that UNC0822 and UNC0833 had already been implemented into the UNC and that the two outstanding Modifications (UNC0844 and UNC0845) are with Ofgem for decision. They added that UNC0844 is the only Modification that requires the addition of legal text for clause 8 into the IGT UNC.

The Code Administrator took the Panel through the Modification. Each section of the Report was presented to the Panel for comment.





A small number of typographical errors were found, which the Panel agreed to highlight and correct under the "Panel discussion" headings of the <u>Draft Modification Report</u> and the amendments to the Report would be clearly labelled.

JR asked JS if the Authority could share any views on the progression of UNC0844 and UNC0845. JS said that they could not offer any views.

## Governance

The Panel unanimously agreed that the Modification be subject to Authority decision.

#### **Solution**

SM noted a typographical error in the Solution where the word "IGT" was meant to indicate "IGT UNC".

#### **Legal Text**

The Panel spotted an error in the Legal text section related to UNC0844 and UNC0845. UNC0845 was misrepresented in the Modification as the Modification introducing Clause 8. In fact, Clause 8 is contained in UNC0844. It was agreed that this would be amended in the <a href="Draft Modification Report">Draft Modification Report</a> which would be sent for consultation and that the error had no material effect on the Modification.

The Panel unanimously agreed that the legal text met the purpose of the Modification. The Proposer enquired about which section of the IGT UNC would be appropriate for the new legal text. JR suggested that Part K would be most appropriate for new Legal Drafting.

The Proposer added that two sets of Legal drafting have been written in the case that Ofgem does not approve the last two UNC DSR Modifications (UNC 0844 and 0845). JR added that in this event, IGT167 would still be applicable and enable DSR on IGT Networks based on UNC0822 and UNC0833.

JR added that Ofgem have been engaged and involved in all of the DSR Modifications so far.

The Code Administrator would amend the Legal Drafting to clarify that the Modification will be added to Part K of the IGT UNC.

## **Impacts**

The Panel had no comments or questions on the impacts of the Modification.

JR added that the impacts have been taken from those identified in the UNC modifications and would be the same.

## Central System Impacts

The Proposer informed the Panel that they have been in contact with the CDSP and that there are no expected impacts on any central systems.





## Relevant Objectives

The Panel unanimously agreed that the Modification has a positive impact on objectives (A) and (B). The Panel unanimously agreed with the reasons provided by the Proposer for meeting the relevant objectives.

## **Implementation**

The Proposer added that UNC0844 and UNC0845 have passed the consultation stage.

JR added that Ofgem are urged to consider that the Modification is crucial to establishing DSR for IGT UNC sites in time for the winter period.

The Panel unanimously agreed that the Modification should be implemented as part of an extraordinary release of the IGT UNC if approved by Ofgem.

SM added that the Panel had confirmed that the Modification did not require a Workgroup meeting.

#### Decisions

The Panel unanimously agreed that:

- The Modification did not need to be considered by the Workstream.
- The Modification should be sent straight for a shortened consultation of 10 working days to end on 11<sup>th</sup> August 2023.
- That the Panel hold an extraordinary Panel meeting on 17<sup>th</sup> August 2023 to consider the Modification.

## 8. Workgroup Summary

The Panel had no comment on the Workgroup Summary.

## **Authority Updates**

## 9. Authority Updates

There was no update from the Authority.

## 10. Ofgem's Expected Decision Dates

The Panel were directed to Ofgem's latest Expected Decision Dates which were published on 5<sup>th</sup> July 2023. There were no IGT UNC Modifications included in this table.

## **AOB**

## 11. Shipper Representation on the Panel





CR informed the Panel that they have moved roles and it was unlikely that they would stand again on the Panel as a Pipeline User Representative. They indicated that they intend to stay until the end of their tenure in September.

The Chair told the Panel that the risk of having no Shippers on the Panel has increased. They added that the non-quoracy rules that the Panel abides by will still apply. However, there should be debate on the consequences of no Shipper representation on the Panel.

SM added that the CDSP holds a Shipper constituency meeting and that this message could be passed along to them.

CR added that there have been representation issues across the industry in recent months.

## 12. DCC – CSS (Central Switching Service) Switching Incident

The Chair informed the Panel of the Switching Incident that took place on 6<sup>th</sup> July 2023. They added that there is an impact on some IGT sites. Over time, there would be further issues for particular sites as their Switch date arrives. The Chair added that the CDSP are communicating with the DCC as the situation is rectified. The most likely remedy option would likely lead to a historical Shipper record discrepancy.

The Chair said that a UNC Modification would likely be drafted in the coming weeks and that would possibly mean an IGT UNC Modification would also be required. Also, if the UNC Modification is to be raised as an Urgent Modification, then the IGT UNC Modification is likely to follow the same timetable.

The Chair added that <u>UNC0836 – Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067</u>, is part of developing a missing messages issue. This will provide a manual solution for low levels of messaging. This Modification will also be needed in the IGT UNC.

CR asked the Chair which UNC representatives would pick up this Modification. The Chair said that the CDSP and SEFE were looking at this. In discussions at the UNC Distribution Workgroup, there appeared to be support for avoiding the urgent Modification route to ensure there was Workgroup input.

The Chair noted that the final decision on the next steps to rectify the CSS would be taken by the DCC.

The next IGT UNC Panel meeting will be an Extraordinary Panel Meeting and is scheduled for Thursday 17<sup>th</sup> August 2023.

The next routine monthly IGT UNC Panel meeting is Friday 25th August 2023.





## Annex 1 - Actions Table

Reference	Date	Action	Owner	Status
23/05 – 02	26/05/2023	JS to inform the Ofgem Code Reform policy team of	Authority	Closed
		concerns regarding ongoing Shipper representation		
		and quoracy issues at the IGTUNC Panel.		

