

IGT UNC 23-11 Modification Workstream Meeting

Draft Minutes

Thursday, 9th November 2023 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Cher Harris	CH	Indigo Pipelines	
Charlotte Gilbert	CG	BUUK	
David Mitchell	DM	SGN	
Eilidh McNally	EM	Last Mile	
Ellie Rogers	ERo	Xoserve	
Ellie Rutherford	ERu	Energy Assets Pipelines	
Helen Bevan	HB	Gemserv	Code Administrator
Jenny Rawlinson	JR	BUUK	
Lee Greenwood	LG	British Gas	Proposer for IGT168
Nick King	NK	Barrow Shipping	Proposer for IGT172
Stuart Monk	SM	MUA	
Isaac Moore	IM	Gemserv	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting and accepted apologies received from David Morley (OVO). The Chair noted that LG would be arriving later to the meeting.

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 [23-09](#) and [23-10](#)

IM informed the Workgroup that comments were provided by NK on the 23-09 Workstream minutes. The Code Administrator presented an amended version of those minutes. The Workgroup accepted these amended minutes as a true and accurate record of the meeting. EM asked about the use of the transcription of the meeting as additional support when drafting minutes. The Chair said that the recording and transcript are only used as a last resort to support note taking and indicated that the IGT UNC Policy for Recording meetings is to delete the recording once the minutes are finalised by approval at the next meeting. Parties are therefore encouraged to raise issues with the minutes prior to the next meeting if the recording is to be of any assistance.

IM informed the Workgroup that no comments were received for the draft 23-10 Modification Workstream meeting minutes prior to the meeting. The Workgroup had no comments to add to the minutes at the meeting and they were approved as a true and accurate record of the meeting.

4. Outstanding Actions

The Chair informed the Workgroup that there were no outstanding actions.

MODIFICATIONS

5. IGT165 – Independent Shrinkage Expert and Independent Shrinkage Charge

The Workgroup agreed to delay the discussion on IGT165 as the Proposer was absent.

6. IGT168 – Establishing/Amending a Gas Vacant Site Process

LG informed the Workgroup that the equivalent UNC Modification, UNC0819, was currently out for consultation. There were no further changes to the IGT UNC Modification Proposal. The Workgroup suggested that the Workgroup Report be completed in this session. The Code Administrator took the Workgroup through the Proposal.

Governance

JR said that regarding proposed Authority Direction for this Modification, the Authority appreciates receiving linked UNC and IGT UNC Modifications together.

The Workgroup agreed that the Modification should mirror UNC0819 and be considered by the Authority for decision.

Solution

The Chair asked if members had agreed that the solution was adding that the IGT Supply points would be treated in the same way as the UNC Supply points and be included in the UNC scheme.

JR added that IGT Transportation charging is made up differently to Gas Distribution Network (GDN) Transportation charging, and that IGT Transportation Charges application can only be ceased when a meter is disconnected.

Consumer impacts

The Workgroup discussed the consumer billing impacts. JR reminded the Workgroup that the AQ is expected to be reduced with this programme.

Relevant objectives

The Chair mentioned the possible efficiency gains if the IGT Supply points are treated in the same way by UK Link. JR said that this would only be the case if a site is highlighted as “vacant.” The Workgroup agreed that this would simplify the CDSP system delivery.

JR highlighted that without this Modification there would be additional costs to be added onto the UNC0819 ROM if the IGT UNC Modification was not implemented.

Implementation

The Workgroup agreed with the approach to have an extraordinary release for the IGT UNC. The Workgroup also acknowledged that they would not want this Modification implemented if the equivalent UNC0819 is not approved by the Authority. The Workgroup agreed that the Modification should proceed in line with XRN5615.

Legal Text

JR asked about Charging Relief that the modification is seeking and if there was anywhere within the UNC legal drafting that points to whether this would impact or give a Charging Relief. The Chair said that as the AQ would be changed, this new AQ would be used to calculate Distribution Network capacity charges and so reducing this AQ within the calculation means you get the Relief.

The Workgroup agreed that the Legal Drafting met the requirements of the Solution.

Recommendations

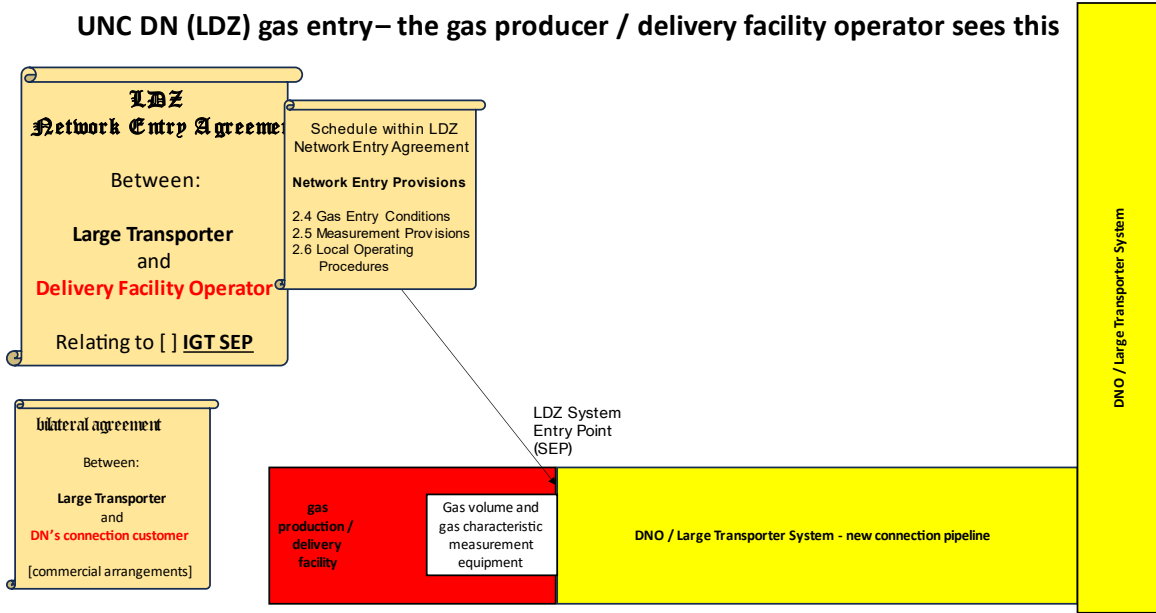
The Workgroup agreed to send IGT168 back to the IGT UNC Panel with a completed Workgroup Report and a recommendation that the modification be sent out for consultation.

7. IGT172 – Optional service for physical gas entry into an IGT Pipeline and into the UNC Total System marrying to UNC Mod 0842

NK introduced the modification and presented their slides ([PowerPoint Presentation \(igt-unc.co.uk\)](http://igt-unc.co.uk)) to the Workgroup to indicate how the modification marries to UNC 0842 - Gas Entry onto the Total system via an Independent Gas Transporter.

[\[Slide – ‘UNC DN \(LDZ\) gas entry – the gas producer / delivery facility operator sees this’\]](#)

UNC DN (LDZ) gas entry – the gas producer / delivery facility operator sees this



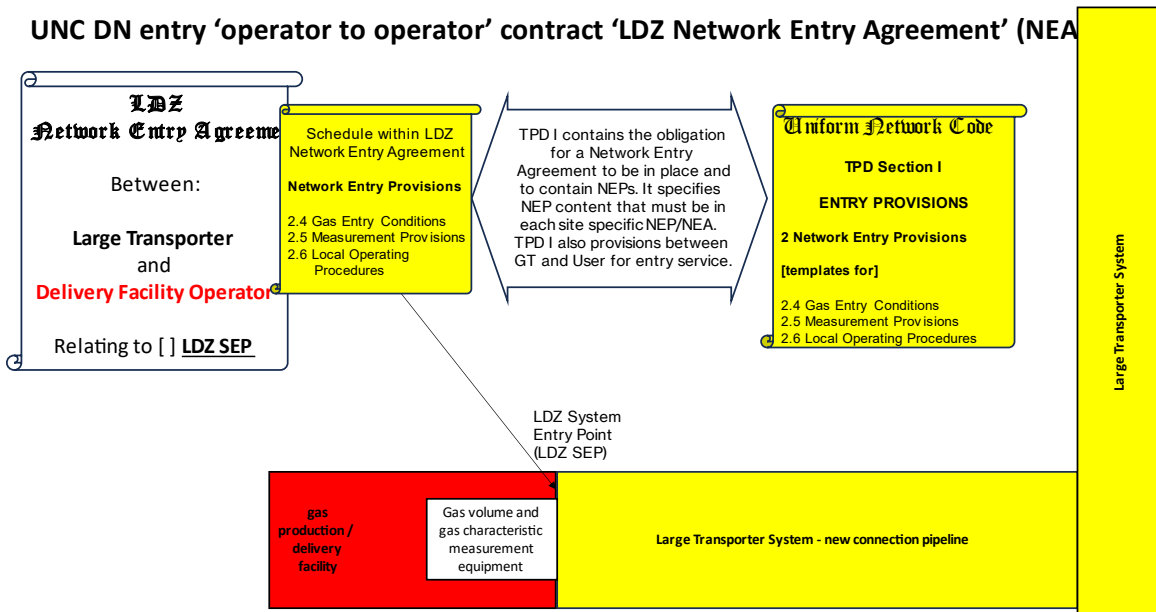
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JR asked about the “Network Entry Agreement” for the Gas Producer and if it was an equivalent to the “Network Exit Agreement” which is used by an IGT. NK confirmed that this was the case.

[Slide ‘UNC DN entry ‘operator to operator’ contract ‘LDZ Network Entry Agreement’ (NEA)]

UNC DN entry ‘operator to operator’ contract ‘LDZ Network Entry Agreement’ (NEA)



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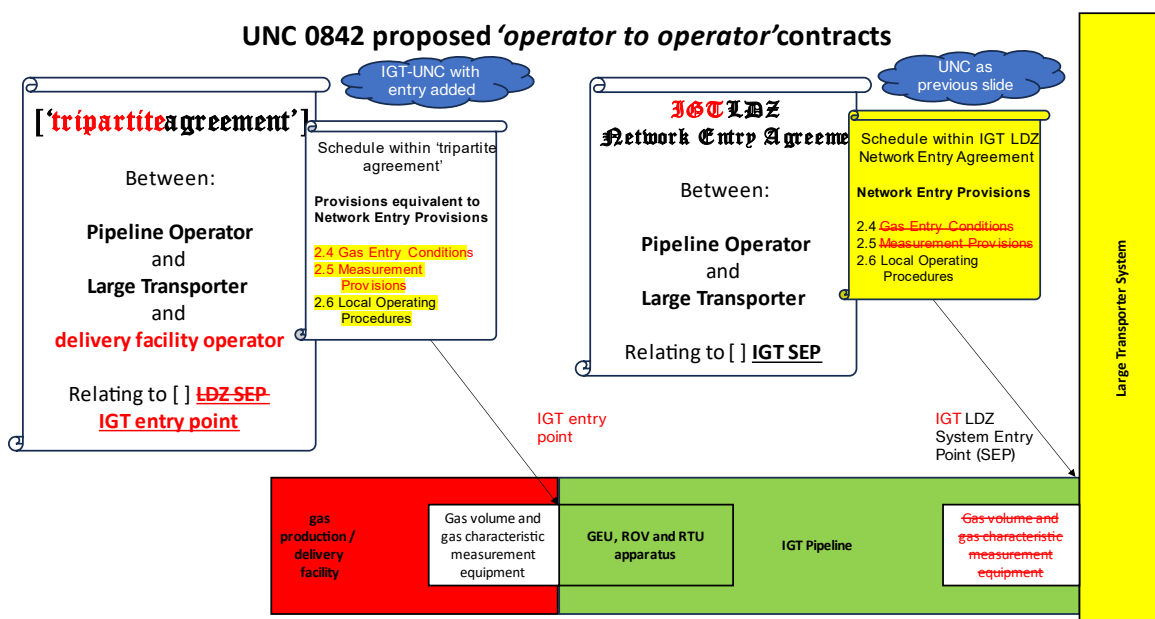
The Chair asked about the HSE’s involvement when TPD Section I was introduced to the UNC, and whether the HSE would need to participate in this new Modification development. NK said that the HSE are involved in Safety Case discussions but in respect of the mod itself, they could not confirm

this at the moment. They NK added that the Gas Safety Management Regulations (GSMR) were introduced in 1996, the same year in which the original Network Code was introduced, and that they have been changed for the first time ever, this year. The Chair said that the HSE would potentially be interested in ensuring that the Governance is in place for the entire process laid out in UNC0842 and IGT172. The

Chair then asked what the consequences would be if a party was in breach of the Network Entry Agreement. DM answered that the supply would be terminated through a remotely operated valve.

[Slide – ‘UNC 0842 proposes IGT LDZ NEA as vehicle for NEPs (& IGT equivalents to NEPs)’]

[Slide – ‘UNC 0842 proposed ‘operator to operator’ contracts’]



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JR asked if these rules would be explicit in the commercial agreement between the GDN/IGT and the Gas Producer. NK confirmed that they would be. The Chair asked about the measuring issues on the meters which are recorded for Settlement, from a governance perspective. The Proposer said that in extreme circumstances, the delivery of gas at the point meter can be turned off. DM added that annual audits are performed on the meters to ensure accuracy. [post meeting note: Ofgem ensure compliance with the requirements defined in the Gas (Calculation of thermal energy) Regulations] NK added that the HSE approve the new GSMR Ssafety Ceases.

The Chair asked to confirm that in the case of an incorrect meter, the gas can be turned off. DM and NK confirmed this. JR asked there would be a valve which could be switched off by the GDN. NK said that this would be determined outside of the Code in the tripartite agreement to be introduced by UNC mod 0842.

CG asked if the Tripartite Agreement will be written by the Large Transporter. DM confirmed that this was the case for UNC0842. NK added that both the IGT UNC and the UNC would be pointing to the Tripartite Agreement and use the 'provisions equivalent to Network Entry Provisions' that will be a schedule to it.

The Chair asked if the IGTs would be responsible for the Tripartite Agreement, as GDNs are not parties to the IGT UNC. NK said that the agreement is a condition precedent and an ongoing obligation: if there is no agreement, there will be no service. The Chair asked who is responsible for the valve (in the Tripartite Agreement). DM said that in UNC0842, the Network Operator would be responsible. The Chair said that there should not be a duplication of governance from the UNC and from the IGT UNC.

The Chair asked if this situation was for a specific use case. DM said that if UNC0842 is approved, all IGTs will be able to contract with a gas delivery system. DM added that one issue is that of Title and Risk, this was currently missing in the IGT UNC.

NK added that the governance of section TPD Section I of the UNC which would be required in IGT172, was already included in Section J of the IGT UNC.

The Chair asked why the entire Network Entry Agreement needs to be put into the IGT UNC. The Chair added that this was not indicated as being necessary in UNC0842. NK said that the Network Entry Agreement/trilateral agreement would not be part of either code, but would be required to be in place outside code by code, but that the equivalents of Network Entry Pprovisions which will be a part of IGT-UNC were essential for IGT172 and UNC 0842 to be effective. NK presented the templates of ~~the an LDZ~~ Network Entry Agreement and the UNC TPD template for Network Entry Provisions in TPD Section I on screen. JR asked to confirm if the TPD Section I template would be added to the IGT UNC. NK confirmed that this was the case.

The Chair said that there were still questions in the development of this Modification, as the Legal Text requirements have already been articulated in the solution without the required outcomes and intent being articulated against which legal drafting is tested.

The Chair asked DM if they were comfortable that all the responsibilities from TPD Section I of the UNC will be passed over to the IGT. DM said that it was assumed that an IGT would come to a Network Operator for help in monitoring the site. The Chair clarified that this was to be achieved through private agreements.

The Code Administrator took the Workgroup through the Modification Proposal (as amended).

CH asked about copying the requirements from the UNC TPD and if it was because the IGT UNC uses different words for certain terms. NK said that streamlining the language was important to reduce confusion.

JR asked about the issue of Transportation Charges. NK said that the Transportation Charges for the cross-code arrangement are all done under the UNC system. JR said that this could give the impression of a nullification of charges on the IGT network. JR added that for the avoidance of doubt, it could be clarified that the Modification does not impact any existing Transportation Charges.

CH asked how the Transportation would be charged. NK said that for IGT-UNC 172, the IGT would not charge the

Shipper, but as happens with the GDNs, the IGT would charge in-through the bilateral agreement. SM asked if the costs of the

Transportation would be done through central systems or in the bilateral agreement. They added that as the gas is going upstream in the physical system, there is no impact to MPRNs. NK added that at LDZ entry points, there is a Gemini meter, and the for UNC transportation charges purposes, but that the charges for providing and maintaining the entry point are outside code, only covered by the bilateral agreement. [Post meeting note – there is an LDZ commodity rebate for gas that would have been provided by the NTS but is displaced by LDZ entry gas.]

ERo said that for UNC0842, the CDSP has stated that new IGT entry points will function like existing LDZ biomethane sites. Under UNC0842, the information is passed to the relevant DN. SM added that under current LDZ arrangements, the Transportation cost for the short stretch of pipe is done under the commercial bilateral contract. DM said if a biomethane plant is connected to a GDN network, the volume of gas introduced into the network for UNC purposes is done through Gemini.

SM asked about a scenario related to a biomethane plant. Under an existing IGT network, a biomethane plant could be connected to a IGT network, but is this is not taken into account in this Modification? NK said that this could apply under any circumstances. NK said that this Modification is intended to apply to new builds and to existing IGT pipelines. SM asked if the agreement for shutoff would be the same. DM confirmed that this was the case. JR asked if a Supplier would be involved at all in this process. NK said that the Supplier is not involved.

SM said IGTs would need to review their Gas Safety Cases, as those would likely not indicate that gas can be taken upstream. NK agreed that this was extremely important for any IGT that intended to use the IGT172 entry system service.

DM asked for clarity on the use of the words “Optional Service” in the Modification title. They suggested that this could be seen as an optional Modification. NK said that this could be defined as an optional service for IGTs, but not optional for a GDN if an IGT chooses to use this entry system. NK agreed to remove the “Optional” from the Modification title. SM asked if the “UNC Total System” was the LDZ Total System. DM said that under UNC0842, the title referred to gas entering the Total System from the “DNO network”. The Chair asked if the LDZ definition included IGTs. NK said this was not the case. JR said that the Total System does not include IGT Supply points, however, the title of the Modification does include both.

ERo asked about the optionality for IGTs, which in turn raised questions about costs of delivering the modification. NK indicated that as the Modification follows UNC TPD Section I, there would be no changes to Xoserve systems. ER agreed with this.

Next Steps

SM suggested that the legal drafting would need to be defined fully before the Workgroup can conclude discussions. NK suggested that a change marked version of UNC TPD section I could be presented at the next IGT UNC Workstream as a start to the legal drafting work. The Chair added that it was crucial that the objectives of the Modification be properly articulated. The Workgroup agreed to come back to this Modification with Legal Drafting for review.

The Chair said that based on the current form of the Modification (i.e., articulated solution leading to drafted legal text), it would be difficult to progress the Modification to conclusion for consideration by the Authority.

23/09 – 01: NK to amend the IGT172 Modification Proposal and draft the legal text in preparation for the December IGT UNC Workstream

8. [Cross Code Modification Implications Tracker](#)

The Code Administrator took the Workgroup through the Tracker. CG noted the new UNC Modification to remove the use of fax machines from UNC governance. JR added that fax technology was being made redundant at the end of 2025. The Chair asked if any member was willing to sponsor the equivalent IGT UNC Modification.

CG mentioned that a new Demand Side Response (DSR) Modification was under development to allow for trials to take place in the Non-Daily Metered (NDM) market. They added that the reasoning for the new Modification could include IGT sites. The Chair said that including the IGT sites would add value to the trial.

Comments were made about 0841/A - Introduction of cost efficiency and transparency requirements for the CDSP Budget in relation to the Data Services Contract (DSC). JR said that there would likely be an IGT UNC impact because IGTs and IGT shippers are users of the DSC for services required under the IGT UNC.

9. [IGT UNC Known Issues Register](#)

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

AOB

10. Asset Transfer from Fulcrum to ESP

The Chair noted that an Asset Transfer from Fulcrum to ESP was underway, timed for the 1st December 2023.

11. Stuart Monk departure from the IGT UNC Panel

JR noted that SM would be leaving MUA at the end of November and therefore the IGT UNC Panel after the next meeting and future IGT UNC Workgroups. The Workgroup thanked SM for his contribution to the Panel and Workgroups and wished him well for his next undertaking.

The next Workgroup meeting is scheduled for Thursday 7th December 2023.

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Annex 1 – Actions Table

Reference	Date	Action	Owner	Status
23-11/01	9/11/2023	Nick King to amend the IGT172 Modification Proposal and draft the legal text in preparation for the December 2023 IGT UNC Workstream	Nick King	Open

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