














Final Modification Report	At what stage is this document in the process?
<h1>IGT170:</h1> <h2>Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;">01 Modification</div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;">02 Workgroup Report</div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;">03 Draft Modification Report</div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px; background-color: #f4a460;">04 Final Modification Report</div> </div>
<p><b>Purpose of Modification:</b></p> <p>Since the introduction of Faster Switching Arrangements in July 2022, there have been incidents whereby systems that interface with the Central Switching Service (CSS) have not received expected messages because they have not been generated, or because of issues in transmission or receipt of the messages. This Modification clarifies treatment and activities necessary when the CSS Registration Effective from Date does not align to that recorded in the UK Link system due to this issue.</p>	
	<p>Panel consideration is due on <b>24<sup>th</sup> November 2023</b>  <i>(Delete as appropriate following Panel's decision)</i>                      The Panel recommends implementation</p>
	<p>Panel consideration is due on <b>24<sup>th</sup> November 2023</b>  <i>(Delete as appropriate following Panel's decision)</i>                      The Panel does not recommend implementation</p>
	<p>High Impact: None identified.</p>
	<p>Medium Impact: Parties: IGT Transporters Codes: UNC – This Modification is the IGT equivalent of UNC Modification 0836S. REC – R0067 has been considered in the development of the solution option described within this Modification – as this will mitigate prolonged adjustment periods.</p>
	<p>Low Impact: Suppliers; Shippers; Consumers</p>

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Timeline			Other: Xoserve
<b>Modification timetable:</b>			 <a href="mailto:David.addison@xoserve.com">David.addison@xoserve.com</a>
Initial consideration by Workgroup	12th October 2023		 0121 299 2138
Amended Modification considered by Workgroup	n/a		Other: Jenny Rawlinson
Workgroup Report presented to Panel	27th October 2023		 <a href="mailto:Jenny.Rawlinson@bu-uk.co.uk">Jenny.Rawlinson@bu-uk.co.uk</a>
Draft Modification Report issued for consultation	30th October 2023		
Consultation Close-out for representations	20th November 2023		 +44 (0) 1359
Variation Request presented to Panel	n/a		243321
Final Modification Report available for Panel (Late Paper)	22nd November 2023		
Modification Panel decision	24th November 2023		

## 1 Summary

### What

This Modification proposes that in the event that the Central Data Service Provider (CDSP) becomes aware that Registration details in the UK Link system are not aligned to Central Switching Service (CSS), then the CDSP is able to update the details prospectively in the UK Link system as soon as is practicable. It further proposes that the IGT Uniform Network Code (IGT UNC) acknowledges that - in the event of this misalignment - the Shipper recorded in CSS is responsible for the Supply Meter Point for the purposes of invoicing, despite not being recorded as such within the Supply Point Register. To assist in Settlement (including IGT Transportation invoicing, and where relevant Metering charges) processes this Modification also proposes that the CDSP adds a valid Meter Reading on the CSS Registration Effective Date, and the treatment of such a Meter Reading by Users.

This modification further proposes that any Settlement is subject to a materiality test, and where any adjustments are below this threshold the adjustments will not be issued to the relevant Shipper Users.

### Why

This Modification is intended to minimise the risk of exceptions occurring in the Registration process, but to clarify responsibility for invoicing (including IGT Transportation and relevant Metering charges) should they occur.

Significant changes were made to the IGT UNC as part of the Faster Switching Significant Code Review to support implementation of the CSS. As a result of a number of issues identified since implementation, there are instances where CSS and the UK Link system is misaligned. These issues are where the relevant messages have not been generated or because of issues in transmission or receipt of the messages have occurred. Misalignment between CSS and the UK Link system was never envisaged in the drafting of the IGT UNC as part of the SCR. These changes are necessary to ensure that:

- The CDSP has the authority to act upon an instruction to update the Supply Point Registration details that is received in a form that is not currently envisaged within the IGT UNC; and
- There is clarity in the IGT UNC as to which party is responsible for Settlement in the event that CSS and the UK Link system are misaligned; and
- The CDSP may load a Meter Reading on the CSS Registration Date, who may replace such Meter Reading and the purpose for which this Meter Reading is loaded; and
- There is clarity about the circumstances, under this Code, that the IGTs shall generate and issue invoice adjustments

### How

This Modification proposes changes to the IGT UNC to acknowledge that in the event of misalignment between the CSS and UK Link systems that the CDSP can act to remedy this inconsistency and confirm the responsibility for the Supply Point, so that it is clear to whom the IGT should issue invoices under the IGT UNC. It also proposes that the CDSP generate a Meter Reading on the CSS Registration Effective Date.

## 2 Governance

### Justification for Self-Governance Procedures

This Modification is proposed as Self-Governance because the Modification:

(i) is unlikely to have a material negative effect on:

(aa) existing or future gas consumers; and

(bb) competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes; and

(cc) the operation of one or more pipe-line system(s); and

(dd) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and

(ee) the uniform network code governance procedures or the network code modification procedures; and

(ii) is unlikely to discriminate between different classes of parties to the uniform network code/relevant gas transporters, gas shippers or DN operators.

This Modification is not expected to have a material negative effect on existing or future gas consumers in that it doesn't increase timing or costs of switching – rather it seeks to clarify the relevant treatment when integration issues between the CSS and the UK Link system because the necessary messages have not been generated or because of issues in transmission or receipt of the messages have occurred. In this regard it is expected to have a positive effect for consumers ensuring that the CDSP may act in the event that it becomes aware of a discrepancy.

### Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup.

The technical solution for REC Change R0067 is expected to be implemented no earlier than December 2023. This change will implement an exception process in the REC for Registration messages from CSS that is different the Supply Point Registration process that is envisaged by the IGT UNC. It is therefore proposed that this be considered by Workgroup to ensure that the Modification is fully developed prior to Consultation.

### Workgroup Discussions (October 2023)

The Workgroup were comfortable that the Modification did not have any material changes. The workgroup noted that to date no IGT sites would have been subject to an adjustment had this modification

been implemented previously. The Workgroup supported the Self-Governance statement. Discussions have taken place under the UNC for the relevant mirror Modification.

### Panel Discussions (October 2023)

The Panel agreed that this Modification does meet the criteria for self-governance procedures.

## 3 Why Change?

Significant changes were made to the IGT UNC as part of the Faster Switching Significant Code Review to support implementation of the CSS. As a result of a number of issues identified since implementation, there are instances where CSS and the UK Link system is misaligned. These issues are where the relevant messages have not been generated or because of issues in transmission or receipt of the messages have occurred. Misalignment between CSS and the UK Link system was never envisaged in the drafting of the IGT UNC as part of the SCR. These changes are necessary to ensure that:

- The CDSP has the authority to act upon an instruction to update Supply Point Registration details that is received in a form that is not currently envisaged within the IGT UNC; and
- There is clarity in the IGT UNC as to which party is responsible for Settlement in the event that CSS and the UK Link system are misaligned; and
- The CDSP may load a Meter Reading on the CSS Registration Date, who may replace such Meter Reading and the purpose for which this Meter Reading is loaded; and
- There is clarity about the circumstances that under the IGT UNC that IGTs shall generate and issue invoice adjustments.

#### Ability for the CDSP to update Registration details

If the changes proposed within the Modification are not made then the CSS and UK Link systems will not be aligned on an on-going basis, as the CDSP will not be able to act to remedy such inconsistency once it becomes aware of it.

This Modification seeks to clarify the party responsible for Settlement in the event that this situation occurs.

REC Change Proposal R0067 - Introduction of CSS Refresh Functionality – will introduce the capability for the Gas Retail Data Agent (GRDA – a role that the CDSP performs in REC) to request a **Resend** of a missing message or request a **Refresh** of an individual Supply Meter Point's Registration data from CSS in instances where we suspect that UK Link and CSS data are misaligned.

IGT UNC only envisages the CDSP being in receipt of a 'Secured Active Notification' from CSS in order to affect a Supply Point Registration. The Resend functionality will enable the CDSP to request the Secured Active Notification (or the cancellation notice) to be sent, this component of R0067 does not require a Code Modification.

The Refresh functionality does not result in the generation of a Secured Active Notification – therefore at present the CDSP cannot act upon the Registration Event Synchronisation (which is the message that the CDSP will receive from the CSS following a Refresh request being issued).

#### Responsibility for a Supply Point

The changes for the Faster Switching SCR, amongst other things, defined the basis on which a User became the Registered User of a CSS Supply Point in the Supply Point Register. The IGT UNC changes did not consider the circumstances where the CSS and UK Link systems were misaligned. This is not a failure of the SCR as this was a scenario that was not envisaged by the Ofgem Switching Programme, and indeed any changes to remedy such instances were deferred from the Programme.

This Modification seeks to clarify the responsibility for the Supply Point in the exceptional event that CSS and UK Link systems are misaligned.

### **Insertion of a Meter Reading for the CSS Registration Effective Date**

Where a Supply Point is created an Opening Meter Reading should be obtained for the Supply Point Registration Date in accordance with TPD Section M 5.13. Where this is not provided the CDSP will estimate a Meter Reading. This Meter Reading is used in Settlement to define the gas used between the previous and the new Registered User, the Suppliers and potentially end consumer billing.

The CDSP has proposed to insert a Meter Reading on the date that the Supply Point Registration of the CSS Supply Point would have become effective in the Supply Point Register had all messages been generated and received successfully. This Meter Reading will only be inserted where a Meter Reading does not otherwise exist in UK Link systems. on the CSS Registration Effective Date. This Meter Reading will be a Valid Meter Reading – i.e., it would be used for reconciliation (i.e., a Reconciliation Meter Reading), and could be used for AQ – but since it is proposed that this is added once the Opening Meter Reading has been loaded then it is unlikely to be utilised as the AQ Closing Reading (TPD M 2.3.7 (a) refers). This will enable Users to continue to use this Meter Reading as if the CSS and UK Link systems were aligned. Treatment of this Meter Reading will be different from a standard Opening Meter Reading in that only the User who is recorded on UK Link systems (i.e., the party that will become the Outgoing User with UK Link systems are updated with the Supply Point Registration) will be able to replace this, as opposed to the incoming User. It is required that both Shippers will co-operate with one another and ensure that any alternative Meter Reading that is agreed must be replaced by the User able to do so. For the avoidance of doubt, there may be some instances where the CSS Registration Effective Date Meter Reading cannot be loaded into the UK Link system – in such instances the Meter Reading will be derived and provided to the Users, but any Replacement of such Meter Readings will need to be provided via manual processes.

### **Materiality Test, and Assessment by the CDSP**

The UNC Modification Panel posed a question to the workgroup to ‘consider the materiality for the invoicing arrangements and consequential impacts on stakeholders’. During the UNC Modification development, the impact to Transportation charges and gas allocation were described (see table below). In light of this, the Modification was developed to include a materiality test to determine whether an adjustment is required to apply the invoicing to the Shipper defined in the CSS Registration from the CSS Registration Effective Date (i.e., the incoming User). Where the materiality test indicates that the energy quantity does not exceed the defined threshold the adjustment will not be processed and therefore will remain the responsibility of the outgoing User for the period between the CSS Registration and the UKL Registration Effective Dates.

	Typical Domestic Property	Average sized Industrial/ Commercial Property	Very large Daily Metered site
Assumed AQ (kWh)	16,258	564,000	139,500,00
Peak Day Consumption (SOQ – kWh)	149	3,528	687,032
Typical Transportation Charges per Day	£0.70	£7.35	£535.85
Average gas allocation per day kWh/cost	45 kWh £1.76	1,545 kWh £60	382,252 kWh £14,907
Peak day gas allocation per day kWh/cost (i.e. worst case scenario)	149 kWh £11.18	3,528 kWh £265	687,032 kWh £51,527

- Switch not processed – old Shipper continues to be billed, new Shipper not billed

This Modification proposes that the same materiality test as defined in UNC Modification 0836S is applied within IGT UNC when determining whether an invoice adjustment is generated. CDSP will assess the materiality of the adjustment required once the Registration has taken effect in UK Link systems and the Opening Meter Reading and the CSS Registration Effective Date Meter Reading has been recorded.

Following the implementation of Resend and Refresh functionality it is expected that both the volumes of missed messages and the period of any adjustments will be reduced. The proposed materiality test is intended to avoid small adjustments being generated which will impose costs upon all impacted parties to manage and which may exceed the value of the adjustment itself.

Aligned to UNC Modification 0836S, this Modification proposes that the materiality test utilises the value defined in REC Schedule 30 Resolution of Consumer Facing Switching and Billing Issues, paragraph 9.4 which determines whether a Supplier Agreed Reading process must be undertaken. The REC process is triggered where “the difference between the Energy Supplier’s view of consumption and that derived from the Switch Meter Reading is more than 1,200 kWh for a gas RMP” (Retail Energy Code; Schedule 30 para 9.4(b)).

Aligned to UNC Modification 0836S, this modification proposes that the CDSP shall perform the one-off assessment against the ‘materiality test defined in REC Schedule 30, paragraph 9.4(b)’. Based on the current values defined in REC Schedule 30, this will mean that where the energy value derived is 1,200kWh or less then the adjustment shall not be undertaken.

### Timeline for Assessment of the Materiality Test

This Modification proposes that the CDSP will perform the Materiality Test at the end of the third month following the UKL Registration Effective Date (e.g., if the Registration takes effect on UK Link systems in February, then the CDSP will perform the Materiality Test no earlier than the final Working Day of the Month 3 months after the Registration was effective in UK Link systems – e.g., 31<sup>st</sup> May 2023). For the avoidance of doubt Meter Readings may be replaced following the Materiality Test being conducted, but any such Replacement Readings will not be factored into the Materiality Test nor amend the result of a previous Materiality Test, nor amend any Adjustment undertaken for this reason. This means that any Replacement Readings must be accepted by the CDSP prior to this point in order to be considered for the Materiality Test and Adjustment.

Once the Materiality Test has been conducted the CDSP shall notify the IGTs for any impacted Supply Meter Points and the energy quantity determined.

For the avoidance of doubt, the IGTs do not have a prescribed timescale, following the point that the Materiality Test is conducted with which to issue any adjustments that are determined to be required and this will be at each individual IGT’s discretion.

## 4 Code Specific Matters

### Technical Skillsets

No specific knowledge or skills are expected to be required.

### Reference Documents

[REC Change R0067](#) – a working understanding of this change is recommended as this will assist in driving down adjustment periods, and consequently the adjustment value.

## 5 Solution

### Ability for the CDSP to update Supply Point Registration details

This Modification proposes that in the event that the CDSP becomes aware that Supply Point Registration details in the UK Link system are not aligned to CSS, then the CDSP is able to update the details prospectively in the UK Link system as soon as is practicable.

### Responsibility for a Supply Point

This Modification seeks to clarify the responsibility for the Supply Point in the exceptional event that CSS and UK Link systems are misaligned. In these exceptional circumstances the CSS Recorded Shipper (i.e. a Shipper who is recorded on the Central Switching Service as the registered Shipper, but as a result of the 'missing message' issue is not recorded as the Registered User (i.e. Portfolio Shipper) in the UK Link system)) will be responsible for the Supply Point – and consequently under the IGT UNC will be responsible for the IGT Transportation charges, and where relevant the Metering charges. This is intended to be an exception statement in the event that CSS and UK Link are misaligned only.

### Insertion of a Meter Reading for the CSS Registration Effective Date

This Modification proposes that the CDSP inserts a Meter Reading on the date that the Supply Point Registration of the CSS Supply Point would have become effective. Such Meter Reading will be notified to both Registered User (i.e., the Portfolio Shipper) and the CSS Recorded Shipper. This will enable Users to continue to use this Meter Reading as if the CSS and UK Link systems were aligned. Only the User who is recorded on UK Link systems (i.e., the party that will become the Outgoing User when UK Link systems are updated with the Supply Point Registration) will be able to replace this, as opposed to the incoming User. It is expected that both Shippers will co-operate with one another and ensure that any alternative Meter Reading that is agreed must be replaced by the User able to do so.

The methodology for Meter Reading estimation will be determined by the **prevailing** Class at the time of the CSS Registration Effective Date and in accordance with UNC TPD 5.4.1 and 5.4.2 for Classes 1 and 2, and for 3 and 4, respectively. It is not expected that Meter Readings will be required for Class 1 and 2 Supply Meter Points it would be expected that other daily read processes would have already inserted a Meter Reading, but the ability to insert such Readings should not be prevented if required. For Class 3 and 4 Supply Meter Points (i.e., use the NDM Supply Meter Point Demand in accordance with TPD M5.4.2, and for the avoidance of doubt if there is a later Meter Reading than the CSS Registration Effective Date Meter Reading, then the consumption will be profiled using this methodology between the Meter Readings preceding and following the CSS Effective Date).

### Materiality Test, and Assessment



This Modification proposes that the CDSP will assess the materiality of the adjustment required once the Registration has taken effect and the Opening Meter Reading and the CSS Registration Effective Date Meter Reading has been recorded in UK Link systems.

This Modification proposes that the CDSP shall perform the one-off assessment against the Materiality Test defined in REC Schedule 30, paragraph 9.4(b)'. For the avoidance of doubt, this is not intended to include a consumer test whether they are willing to accept 'an accommodation' – which is also included in the above paragraph in the REC. This will mean that where the energy value derived between the energy determined between the Readings on the CSS Registration Effective Date and UK Link Registration Effective Date is less than or equal to the value defined in the REC Schedule (currently 1,200kWh or less) then the adjustment shall not be undertaken, nor shall any future adjustment for this reason for the period for this Supply Meter Point.

### **Timeline for Assessment of the Materiality Test**

This Modification proposes that the CDSP will perform the Materiality Test at the end of the third month following the UKL Registration Effective Date (e.g., if the Registration takes effect on UK Link systems in February, then the CDSP will perform the Materiality Test no earlier than the final Working Day of the Month 3 months after the Registration was effective in UK Link systems – e.g., 31<sup>st</sup> May 2023). This means that the latest recorded Meter Readings for the CSS Registration Effective Date and the Opening Meter Readings, including where such Readings have been Replaced, shall be used for the Materiality Test.

For the avoidance of doubt Meter Readings may be replaced following the Materiality Test being conducted, but any such Replacement Readings will not be factored into the Materiality Test nor amend the result of a previous Materiality Test, nor amend any Adjustment undertaken for this reason.

Once the Materiality Test has been conducted the CDSP shall notify the IGTs for any impacted Supply Meter Points and the energy quantity determined.

For the avoidance of doubt, the IGTs do not have a prescribed timescale following the point that the CDSP notify them of the outcome of the Materiality Test with which to issue any adjustments that are determined to be required and this will be at each individual IGT's discretion. Any adjustments will consider IGT Transportation charges, and Metering charges where relevant.

### **Workgroup Discussions (October 2023)**

The Workgroup were taken through the solution by the CDSP representative.

The Workgroup were comfortable that the solution facilitated the aim of the Modification.

### **Panel Discussions (October 2023)**

The Panel were comfortable that the solution facilitated the aim of the Modification.

## **6 Impacts & Other Considerations**

### **Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?**

This Modification does not affect a current live SCR.

### **Consumer Impacts**

This Modification should offer positive benefits to consumers that have been impacted by these Registration exceptions. The Faster Switching SCR moved the responsibility for mastering Registration from the UK

Link system to CSS. There have been a small number of exceptions where the consumer switch has not completed successfully and therefore the Registration and Settlement systems are misaligned. For these impacted consumers this misalignment may mean that they are prevented from Switching or may lead to confusion by Suppliers regarding responsibility for the Supply Point which may lead to issues with consumer billing. This Modification should enable industry processes to minimise the period of misalignment thus reducing the impact to the consumer.

### What is the current consumer experience and what would the new consumer experience be?

Prior to the CSS P1 Incident in July and August 2023, this issue has impacted circa 360 end consumers across the GB Gas Network (Distribution Network and IGT Connections). This Modification should enable the CDSP to manage an exception process to either: reduce the risk of missing messages; or minimise the period that this discrepancy exists.

This Modification should mean that the consumer will receive any benefits stated in the Ofgem business case for Faster Switching regarding reliable switching at reduced timescales.

Impact of the change on Consumer Benefit Areas	
Area	Identified Impact
<p><b>Improved safety and reliability</b></p> <p>Misalignment between Registration and Settlement could lead to a number of industry processes being adversely impacted. To date the impacted sites have primarily been Smaller Supply Points – but were it to impact a Class 1 Supply Meter Point, there could be material impacts to balancing activities – potentially requiring intervention by National Grid on the OCM.</p> <p>Further impacts could be identified should an emergency situation arise if the Shipper has been prevented from updating consumer contact details as they were not recorded as the Registered User.</p>	Positive
<p><b>Lower bills than would otherwise be the case</b></p> <p>Ofgem have previously argued that the consumer’s ability to switch with reduced timescales offers a cost saving but as the number of instances impacted by this exception is small this is not considered to offer a ‘lower bills’ case.</p>	None
<p><b>Reduced environmental damage</b></p> <p>None identified.</p>	None
<p><b>Improved quality of service</b></p> <p>This process should reduce the risk of exceptions in the switching process, and should they be encountered should reduce the period for which the exception instance exists.</p>	Positive
<p><b>Benefits for society as a whole</b></p> <p>None identified.</p>	None

### Cross-Code Impacts

Other impacted Codes are REC; REC Change Proposal R0067 has been raised to consider some of the issues defined in this Modification. UNC Modification 0836S has been progressed to address necessary changes in the UNC.

UNC	<input checked="" type="checkbox"/>
REC	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>
None	<input type="checkbox"/>

### Environmental Impacts

None identified.

### Central System Impacts

Changes are required to the interfaces between the GRDA (a role that the CDSP fulfils in the REC) and CSS. This has been accounted for in [XRN5567 - Implementation of Resend Functionality for Messages from CSS to GRDA \(REC CP R0067\)](#) and the costs approved by the DSC Change Management Committee for delivery of that change.

Another Change Proposal, [XRN5535A - Processing of CSS Switch Requests Received in 'Time Period 5'](#) has been raised to consider the circumstances where the GRDA receives messages after 02:59:59. XRN5535A will include a new DSC Service Line where the CDSP is made aware that the Registration details in UK Link are not aligned to the Central Switching Service, that it shall initiate prospective Registration in UK Link. This relies on the UNCC acceptance of the CDSP using 'proxy Secured Active Notifications' until this Modification establishes this in the UNC. *Please note, acceptance of the 'proxy Secured Active Notifications' was obtained at the November 2022 UNCC meeting.*

A ROM was provided in support of UNC Modification 0855 which (provided both Modifications are approved) will provide the solution for 0836S and 0855 and the IGT UNC Modification equivalents.

### Workgroup Discussions (October 2023)

The Workgroup reviewed the cited impacts. The Workgroup supported the positive impacts noted by the proposer and did not have any further concerns or comments.

### Panel Discussions (October 2023)

The Panel agreed that this Modification does not have a SCR impact.

The Panel agreed with the impacts noted by the Proposer and did not have any further comments.

## 7 Relevant Objectives

#### Impact of the modification on the Relevant Objectives:

Relevant Objective	Identified impact
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(A) Efficient and economic operation of the pipe-line system	None
(B) Co-ordinated, efficient, and economic operation of (i) the combined pipe-line system; and/or (ii) the pipe-line system of one or more other relevant gas transporters	None
(C) Efficient discharge of the licensee’s obligations	None
(D) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers	Positive
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	Positive
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

It is considered that the Modification furthers relevant objective d). This Modification will reduce exceptions to the Registration process. An effective Registration process is essential for securing effective competition.

This Modification furthers relevant objective f) as it allows the CDSP to undertake actions to ensure UK Link systems are aligned with CSS systems and therefore furthers promotion of efficiency in the implementation and administration of the Code. The application of the materiality test defined within this Modification avoids the creation of small adjustments that will be more costly to produce and manage by industry participants therefore this further promotes efficiency of industry processes.

### Workgroup Discussions (October 2023)

The Workgroup agreed with the Proposers view that the Modification would further Relevant Objectives D and F. The Workgroup called out that the application of the materiality test would pose most benefit to Relevant Objective F (Promotion of efficiency in the implementation and administration of the Code). The Workgroup discussed that the ultimate efficiency would be for the Central Switching Service to be working effectively in order for this Modification to not be enacted.

### Panel Discussions (October 2023)

The Panel had no further concerns or comments for the Relevant Objectives.

## 8 Implementation

As Self-Governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised. It is proposed that the implementation date be aligned with the implementation of the technical solution of REC Change R0067.

### Workgroup Discussions (October 2023)

The Workgroup discussed when REC change R0067 would be implemented and the CDSP representative noted this would be early December 2023. This Modification would have to be considered for an ad-hoc release in Mid-December 2023 and the Code Administrator noted that this would be achievable following the closure of the self-governance appeals window.

### Panel Discussions (October 2023)

The Panel agreed with the proposed implementation of an extraordinary release following the closure of the self-governance appeals window.

## 9 Legal Text

The draft legal text for IGT170 can be found on the [IGT170 webpage](#).

### Workgroup Discussions (October 2023)

The Workgroup reviewed the draft legal text. The Workgroup noted that there were some questions around the creation of defined terms in the legal text and request that the Code Administrator provide further explanation of this to the October Panel, but ultimately agreed that the legal text facilitated the Modifications solution.

### Panel Discussions (October 2023)

The Code Administrator advised the Panel that following discussions at the October Workgroup an amended version of the legal text has been published on the IGT170 webpage of the IGT UNC website. This amended version contains the addition of several new defined items which are detailed within the section and there is commentary provided by the Code Administrator against the changes made.

The Panel agreed that they were comfortable that the amendments made accurately reflect the intent of the solution and had no further comments.

## 10 Consultation

Panel invited representations from interested parties on 30th October 2023. The summaries in the following table are provided for reference on a reasonable endeavour's basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
BUUK	Support	D – Positive F - Positive	<ul style="list-style-type: none"> <li>• They support the implementation of this Modification that resolved any misalignment of the CSS and CDSP due to missing messages.</li> <li>• They agree that this Modification meets the Self-Governance criteria.</li> <li>• No new issues identified.</li> <li>• They agree that this Modification has a positive effect on Relevant Objectives (D) and (F).</li> <li>• No ongoing costs are foreseen from the implementation of this Modification.</li> <li>• They agree that this Modification should be implemented 16 Business Days after a Modification Panel decision.</li> <li>• They are satisfied that the legal text will deliver the intent of the Modification.</li> </ul>
MUA Gas Limited	Support	D – Positive F - Positive	<ul style="list-style-type: none"> <li>• In support of this Modification being implemented. In the event of a misalignment of UKLink and CSS data, this Modification will support the resolution of billing to correct parties and help maintain efficient running of switches.</li> <li>• They agree that this should be a Self-Governance Modification. Although it is affecting Supplier payments, it is actually ensuring correct allocation to support competition when erroneous mis-matches with UKLink and CSS may occur (albeit rarely),</li> <li>• No new issues identified.</li> <li>• They support both Objectives (D) and (F) for the reasons provided within the Modification.</li> <li>• No costs are likely applicable for the introduction for this Modification as these are already included within Xoserve Change XRN5567 as described within this Modification Proposal. However, there could be administrative costs to Shippers/GDN/IGTs if this Modification does not go through to manually arrange correct allocation of costs.</li> <li>• As the differences between UKLink and CSS cannot be foreseen (due to P1 incidents eg.) recommendation is that this implementation be as soon as practicable.</li> </ul>

			<ul style="list-style-type: none"> <li>• They are satisfied that the legal text will deliver the intent of the Modification.</li> </ul>
Indigo Pipelines Limited	Support	D – Positive F - Positive	<ul style="list-style-type: none"> <li>• They support the proposals intention to ensure that CDSP and CSS take steps to maintain data alignment in order to minimise the impact to invoicing and Settlements, following a Missing Messages event.</li> <li>• They agree with the proposer that this modification can proceed as Self-Governance.</li> <li>• No new issues identified.</li> <li>• They agree with the proposer that this Modification would have a positive impact on Objective (D), by reducing exceptions in the Switching process, and also Objective (F) by applying a materiality test that prevents IGTs being overwhelmed with invoice adjustments for immaterial sums.</li> <li>• Invoice adjustments arising from this process may need additional resource to manage but it is difficult to predict how often this scenario might occur, and the requirement for CDSP to take action to maintain alignment with CSS should mitigate the impact to IGT invoicing. Therefore, minimal impact and costs anticipated.</li> <li>• They believe that implementation should, where possible, align with related changes going through REC and UNC Governance.</li> <li>• They are satisfied that the Legal Text facilitates the proposal.</li> </ul>

### Summary of Responses

There were 3 responses to the IGT170 Consultation:

- 3 respondents support the implementation of this Modification;
- 3 respondents agree that this Modification should be a Self-Governance Modification;
- 3 respondents agree that this Modification has a positive impact on Relevant Objectives (D) and (F).
- 3 respondents agree with the implementation approach;
- 3 respondents agree the Legal Drafting delivers the intent of the Modification.

All responses have been published on the [IGT170 page](#) of the IGT UNC website.

## 11 Panel Discussions

### Discussion

Insert text here.

## Consideration of the Relevant Objectives

Insert text here.

## Determinations

Insert text here.

# 12 Recommendations

## Workgroup's Recommendation to Panel

Panel is asked to:

- Agree that Self-Governance procedures should apply.
- Send the Modification out for a full three-week consultation.

## Workgroup Discussions (October 2023)

The Workgroup discussed the timetable for this Modification and the Chair noted that there was time allocated for a full consultation period, however the Final Modification Report would be published as a late paper to the November Panel on 24<sup>th</sup> November 2023.

## Panel Discussions (October 2023)

The Panel unanimously agreed for the Modification to be issued out for a three-week consultation with the Final Modification Report being published as a late paper ahead of the November Panel.

## Panel Determination (November 2023)

Members (unanimously / by majority) agreed:

- that Modification 170 should [not] be implemented.