

IGT UNC 24-01 Modification Workstream Meeting

Draft Minutes

Thursday, 11th January 2024 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Charlotte Gilbert	CG	BUUK	
Cher Harris	CH	Indigo Pipelines	
David Morley	DM	OVO	Proposer for IGT165
Eilidh McNally	EM	Last Mile Gas	
Gareth Powell	GP	E.ON UK	
Harry Firth	HF	Gemserv	Observer
Helen Bevan	HB	Gemserv	Code Administrator (CA)
Kathryn Adeseye	KA	Xoserve	CDSP
Kirsty Dudley	KD	E.ON UK	Proposer for IGT173
Lee Greenwood	LG	British Gas	
Nick King	NK	Barrow Shipping	Proposer for IGT172
Oorlagh Chapman	OC	Centrica	
Isaac Moore	IM	Gemserv	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting and no apologies were received.

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 [23-12](#)

IM informed the Workgroup that no comments were received for the draft 23-12 Modification Workstream meeting minutes prior to the meeting. KD and GP mentioned that the correct name of their Shipper party was E.ON UK. The CA agreed to amend the minutes to reflect this. The Workgroup approved these minutes as a true and accurate record of the meeting.

4. Outstanding Actions

The Chair informed the Workgroup that there were three actions as follows:

- **23/12 – 01 Kathryn Adeseye to report back on costs associated with additional nodes and file types as part of the RPC backing data Modification discussion.** KA informed that Workgroup that the CDSP had advised that internal nodes would not be needed but

some configuration would be required, to ensure that IGTs could directly send data to Shippers. They added that there could be costs associated with this. They are looking to start the ROM (for IGT173) process and provide an update at the next IGT UNC Workstream meeting. Action closed.

- **23/12 – 02 Code Administrator to request feedback from parties regarding the legal drafting template for IGT172 - Optional Service for physical gas entry into an IGT Pipeline and into the UNC Total System marrying to UNC mod 0842.** The Chair informed the Workgroup that the feedback request had been sent. Action Closed
- **23/12 – 03 Kathryn Adeseye to update the IGT UNC Workgroup on the portfolio transfers with the relevant CDSP information.** KA informed the Workgroup that the transfer occurred on 1st December 2023 and that the entire Portfolio is now under ESP Pipelines Ltd. The Chair provided historical background to the Fulcrum/ESP asset transfer. Action Closed.

24/01 – 01: KA to provide an update on the ROM for IGT173 at the February IGT UNC Workstream.

MODIFICATIONS

5. [IGT165 – Independent Shrinkage Expert and Independent Shrinkage Charge](#)

DM confirmed the current development stage of the UNC Modification [UNC0843 – Establishing the Independent Shrinkage Charge and Independent Shrinkage Expert](#). This Modification development had been extended to April 2024. The Chair confirmed with the Proposer that the IGT UNC modification was to adopt the UNC shrinkage expert and charge regime from the UNC modification and ensure that data was provided when necessary and IGT's, where necessary, would return gas to the network under UNC governance.

DM informed the Workgroup that the next UNC0843 Workgroup would be taking place on 24th January 2024 and encouraged participation in that workgroup. They had asked SGN to provide legal text to move UNC0843 forward. DM mentioned that the only area that was missing detail was regarding the Independent Shrinkage Provider. The ROM would also be discussed at the next UNC Workgroup.

CG queried how the Shrinkage Charge would be determined for IGTs within the same LDZ. DM responded that it would be performed at the CSEP level for each LDZ.

KD queried if any of the detail needed to be added to the IGT UNC Modification. DM responded that this was expected to be in the Independent Gas Transporters' Arrangements Document (IGTAD). The Chair added that this might be a question for SGN as the provider of the legal drafting. CG queried if the IGTAD decision was a recent development. KA provided the relevant paragraph from the IGT165 ROM.

The Chair queried if any other points needed further discussion or development before the UNC legal drafting was available.

6. IGT172 – Provision for Gas Entry within the IGT UNC

The Chair invited NK to present the amendments they had made to IGT172. The Chair reminded the Workgroup that this was a marrying Modification, not a mirror Modification.

NK provided updates on the Modification Proposal published. They advised that “Pipeline” had been replaced with “network.” This was noted following feedback and NK had expanded the Business Rules to include more detail.

The Workgroup examined how NK proposed using and changing the drafting of [TPD Section I](#) Entry Requirements for the purposes of the IGT UNC. The Chair reminded the Workgroup that the revised drafting of TPD Section I text would eventually be added to the IGT UNC. The Proposer reminded the Workgroup that TPD Section had been in UNC Code since the creation of the UNC and is largely unchanged.

KD queried why the Proposer had chosen not to link the drafting from the UNC with the IGT UNC and planned to insert the drafting into the IGT UNC. The Proposer responded that the IGT UNC does not currently have gas entry. KD queried if the task could be simplified to provide legal structure in the event that changes are made to the UNC. The Proposer responded that a consolidated legal document would likely be necessary.

CH responded that as this was a completely new concept, they believed that having the full text in the IGT UNC was the best option. KD queried how the Workgroup could ensure that all of the changes would be made in the future. CG said that they would ensure that the new Modifications would be reviewed to ensure that the drafting aligns between the IGT UNC and UNC. The Proposer suggested that they would produce a version which would point to TPD Section I and a version which would incorporate TPD Section I Entry Requirements as a new Part Q for the IGT UNC. They suggested that the Workgroup could decide between the two versions.

The Chair queried if a Shipper wished to change the gas specification for gas going into the network, how this translated into the IGT UNC. The Proposer responded that this is specific to each entry point and in the UNC is done through raising a modification. The Chair asked to clarify if a UNC Change or an IGT UNC change would be made specifically for an IGT entry point. The Proposer pointed to paragraph 2.2.1 of TPD Section I. The Chair added that IGTs, DNOs, and Shippers are all party to the UNC and felt that the IGT and the Shipper could not agree on gas specifications in isolation.

The Proposer reminded the Workgroup that the 3 parties must agree to any changes in the required Tripartite Agreement.

The Chair reminded the Workgroup that Shippers are not party to the Tripartite Agreement. This could add further complexity when the premise of the IGT UNC Modification was to make the process the same in the UNC and the IGT UNC.

The Proposer provided background to the Network Entry Agreement history.

The Chair recommended that it be made clear how and where a Shipper could change the gas specification. NK took an action to further consider this issue in relation to TPD Section I 2.2.1 and 2.2.2.

The Chair queried what would need to be changed in Code to change Network Entry Provisions. The Proposer responded that this was in the “Entry Provisions” Schedule. The Chair queried how changes could be made to the Schedule. The Proposer responded that a legal team would need to be involved. The Chair and the Proposer agreed to follow this up at the next IGT UNC Workgroup.

EM queried why the Network Entry Agreement could not include scope for changes to be made after the fact. They provided the example of the oxygen levels in the gas. The Proposer provided historical background to the creation of the UNC and gas entry to the system. They mentioned that the gas specification was relevant to the entire industry and that any change that might affect shippers would potentially affect consumers. The Proposer added that this required safeguards to be put in place.

KD queried about 2.3.3 (e) and if the Emergency Circumstances would still be relevant to IGTs. The Proposer mentioned that this allowed IGTs to be covered for any particular site. KD queried if the term “Emergency” was defined within this paper. The Proposer mentioned that there is a definition in the IGT UNC for the term.

KD queried if “Transporter” referred to “Pipeline Operator.” The Proposer confirmed that this was the case.

KD queried how the calorific value would work with the introduction of Hydrogen to the network. They added that there is no IGT UNC equivalent. They queried if the Proposer would take this away for consideration in the context of [UNC0849R – Commercial Framework Review to Enable Hydrogen Blending](#). The Chair informed the Workgroup that the Review Group had shown to the industry that Hydrogen blends could be introduced to the Network, and that Modifications would be expected to follow once UNC0849R reaches a conclusion. The Chair added that under these circumstances it could be expected that the Network Entry Provisions would be subject to change in the future.

The Chair queried if the Gemini system would be interested in the definition for “Measurement”, concerning 2.5.3 “Measurement Provisions”. The Proposer responded that only the numbers would be important for the Gemini system. KD queried if the IGT or the Shipper would need to ensure that this activity is completed. The Chair queried if this was a potential case of dual governance between the IGT UNC and the UNC. The Proposer suggested that they come back to this item at the next IGT UNC Workstream.

KD queried why “Transportation Constraint” was highlighted in the document. The Proposer added that this was a UNC term, relating to an NTS gas emergency situation. They understood that the new Anaerobic Digestion (AD) sites would be subject to the same constraints. However, the Proposer mentioned that they intend to have this removed for these specific situations. KD queried whether the

Transportation Constraint should be placed in both codes. The Proposer mentioned that under this drafting, the inclusion of the Transportation Constraint was optional. KD queried if it was necessary for this to be included in the legal drafting at all. The Proposer agreed to consider this and to come back to section 2.6.5 and the Workgroup on this.

The Chair mentioned that a gas “shortfall” would upset the Transmission, as written in section 3.11.6. The Proposer responded that it was a different type of shortfall, adding that this was a measure of how accurate the expected numbers are. They added that these input nominations would be processed as data by the National Gas control centre. The Proposer added that this shortfall is the measure of how close each Shipper’s import nomination, i.e. what is expected to go into the system, is compared to the volumes that are put into the system.

The circumstance where gas of the wrong specification was entered onto the system at an IGT entry point was discussed along with what actions might be taken by an IGT to remedy the issue and which Parties might be interested. An example discussed was where ‘venting’ the offending gas might be required.

The Chair queried with the Workgroup about whether the level of discussion in the meeting was useful or whether subject matter experts within their organisations might be better placed to review this sort of documentation? CH stated that this was extremely technical drafting and above their level of understanding. The Workgroup agreed with this view.

KA mentioned that from the perspective of the CDSP, it was harder to provide an opinion as there were no direct impacts to the CDSP from this Modification.

The Chair queried how a Biogas plant would be added to the Gemini system. KA responded that they could not provide an answer to that question. In the context of this Modification, KA added that it was agreed that GDNs would utilise existing data flows and that they would send these to the CDSP.

The Chair queried if IGT UNC governance was necessary so that IGTs could ensure the GDNs send the flows across on their behalf. KA responded that this would depend on what governance was referenced in the UNC from the IGT UNC. KA added that this would depend on the updated version of UNC0842. They also added that as long as the CDSP received the data from the GDNs the process would work and that the CDSP would have no involvement in the transfer of the data from the IGT to the GDN. KA mentioned that this was part of the Tripartite Agreement.

KA presented the [CDSP Central impacts](#) document highlighting that there were no impacts to the CDSP resulting from this Modification. The Proposer and KA agreed to continue discussion offline.

The Chair suggested that documentation from this Modification would be sent to members to review at their leisure before discussion took place at the following IGT UNC Workstream.

24/01 – 02 NK to review and revise where necessary the following sections of the redrafted TPD Section I for IGT172 to ensure clarity:

- 2.2 – Amendment of Network Entry Provisions
- 2.5.3 – Measurement Provisions
- 2.6.5 – Local operating Procedures, “Transportation Constraint”
- 3.1.2 – Pipeline Entry Point daily quantity delivered
- 3.4.2 – Amount Payable by Delivering Pipeline User
- 3.6.1 – Network Entry Provisions
- 3.9 – Restricted Delivery of gas
- 3.11.9 Gas venting

24/01 – 03 Parties to review the legal drafting for IGT172 – Provisions for Gas Entry within the IGT UNC in advance of the February 2024 IGT UNC Workstream.

7. [IGT173 – Gateway delivery for RPC Data](#)

The Chair invited the Proposer to present this Modification to the Workgroup. They outlined that two Workgroups were envisaged for this Modification.

The Proposer reiterated that they would not look at changing the Portfolios or invoicing. The Proposer added that they had raised the XRN related to this Modification.

The Proposer queried with KA if the RPC file type was the right one to be used. KA agreed to examine this in the ROM. KA added that the ROM would provide more detail on the solution. KD queried whether satisfying Business Rule 1 was a node configuration rather than a creation. KA confirmed that from a high level, this appeared to be a configuration exercise. The Proposer queried if Shippers would need a new configuration to receive files from IGTs. KA responded that it was likely that a change was necessary as IGTs were currently not set up to send messages to Shippers.

CG queried if the new node was for each license. KA responded that they did not have an answer and would come back to them through detail in the ROM. The Proposer mentioned that they understood that the license would apply to each individual entity. The Proposer added that they had drafted the Modification to be for each entity at the license level. The Proposer agreed to add this to the Business Rules and to confirm if this was a configuration of nodes on individual MPIDs.

KA advised that for Business Rule 3, IX areas were covered under Service line 22 of the Data Services Contract (DSC) for the CDSP.

The Chair queried if this would be a question of governance or also charging? KA mentioned that this would be included in the ROM produced by the CDSP. Feedback was requested concerning IGT and Shipper governance as soon as possible. The Proposer added that it was most important that the messages be received, and that the focus was not on the content within the messages. CH agreed that as the content is irrelevant, placing these files in the IX would be sensible and might offer potential for other future solutions.

KA agreed to come back with more information on the disaster recovery kit in Business Rule 8. CH mentioned that in the event that the IX was down, they could still use email to communicate. The Proposer added that they would make any necessary edits to the modification solution re formatting of the transportation charging documents to ensure that it is the same document that is shared with all parties.

The Proposer queried how Transporters would want to chase any missing items, within Business Rule 9. CH said that this process already exists, even if it is not documented. KD mentioned that as this was not codified, it was relevant that the gap should be filled. The Proposer suggested that they would make further edits to Rule 9 to elaborate the scenario for disaster recovery.

The Proposer queried if there was any other case where the IGT would not be able to send the file. CH mentioned that they currently have a problem with Shipper contacts' availability. They added that there is no published Contract Manager list. CG agreed with this. The Proposer agreed to take this point away for Business Rule 9. The Proposer added that it served the interests of all parties to improve Contract Manager communication between IGTs and Shippers.

KA queried that if the Proposer made changes to the Business Rules, this would require the CDSP to modify the boundaries of the ROM. The Proposer agreed to carry out the expected changes to the Business Rules within the next few days, in advance of the development of the ROM. The Proposer added that while they had formatted this Modification with the intention of a November 2024 release, they understood the need to find a suitable design.

The Proposer elaborated on Business Rule 10, and CH agreed that this should not cause any issues, but it would be best to cover all possibilities. CH added that their organisation could not go back and provide data in the old format once this Modification has gone through.

The Chair mentioned that in Business Rule 12, from a legal drafting perspective, the bilateral agreement was ambiguous. The Chair queried if the agreement was recognised in the IGT UNC. The Proposer responded that even though it was not codified, the agreement does exist. The Chair queried the enforcement of the five working day rule. CH mentioned that it could be reduced to an agreement between the Shipper and the Transporter. KD proposed that this could be monitored throughout the process, and they could come back to this further on in the development of the Modification.

The Proposer queried the Workgroup on pre-implementation testing requirements. CH advised that they would want to test if the files could be sent via the IX. KA suggested that this would not need to be in the Business Rules and could stay within the CDSP development process. The Proposer advised that they were open to discussion on the best place for testing measures. The Chair suggested that it should be available somewhere as the Proposer believes it is important. The Proposer advised that they were comfortable to maintain an optionality.

Cross Code:

The Proposer advised that there was a link with [XRN5720 – Gateway delivery for RPC backing data](#).

KA queried if the legal text would be available by the following IGT UNC Workstream. The Proposer agreed to this timeline.

24/01 – 04: Feedback concerning governance and charging related to the IX and referenced in Business Rule 3 of IGT173.

24/01 – 05: KD to amend: business rules 1, 9, 12, 13 following discussions at the IGT UNC Workgroup, ahead of the production of the Rough Order of Magnitude (ROM) by the CDSP.

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

The Chair provided the Workgroup with the following updates:

[UNC0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#): The Chair highlighted that in response to enquiries from the CDSP, they had added that UNC legal text would impact on the IGT UNC. The Chair explained that if a Shipper were to cease trading, without going out of business, there would be a gap in the UNC which could allow for the risk that the DN would not be paid. The Chair suggested that IGTs consider implications of UNC0854 and if they are looking for a similar solution. KA mentioned that this was a niche situation where parties are subject to government sanctions.

[0865 - Permitting DNOs to charge Shippers negative Supplier of Last Resort \(SoLR\) unit rates](#): the Chair informed the Workgroup that the SoLR process allowed DNs to apportion charges according to all site supply points, including IGT sites. They added that the correction in the UNC would work for the IGTs.

[0863S – Erroneous Transfers Exception Process](#): The Chair advised that the Proposer had indicated that the Modification would be withdrawn. However, this had not yet happened. KA added that they understood the Modification to be on hold and that the Proposer intended to withdraw it. The Chair added that if the Modification was not withdrawn, there would be an impact on the IGT UNC.

[0856 – Introduction of Trials for Non-Daily Metered \(NDM\) Demand Side Response \(DSR\)](#): The Chair informed the Workgroup that Suppliers would determine which sites were involved in the trials, and that Shippers looking to include IGT sites would need to raise a separate Modification within the IGT UNC.

[IGT159V - Amendments to the Must Read Process](#): the Chair informed the Workgroup that this Modification would be implemented in the February 2024 IGT UNC Release. The Chair added that [UNC0811S - Shipper Agreed Read \(SAR\) Exceptions Process](#) and [UNC0816S – Update to AQ Correction Processes](#) would also be implemented in the February 2024 Release and would impact the IGT UNC through the UNC legal drafting.

24/01 – 06: IGTs to consider implications of UNC0854 and the need for a solution to cover the IGT UNC.

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

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

AOB

10. IM departure and replacement

The Chair informed the Workgroup that IM would be leaving the IGT UNC Code Administration team and would be replaced by Harry Firth. The Workgroup thanked IM and welcomed HF.

The next Workgroup meeting is scheduled for Thursday 8th February 2024.

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Annex 1 – Actions Table

Reference	Action	Owner	Status
23/12 - 01	<i>Kathryn Adeseye to report back on costs associated with additional nodes and file types as part of the RPC backing data Modification discussion.</i>	<i>CDSP</i>	<i>Closed</i>
23/12 - 02	<i>Code Administrator to request feedback from parties regarding the legal drafting template for IGT172 - Optional Service for physical gas entry into an IGT Pipeline and into the UNC Total System marrying to UNC mod 0842</i>	<i>Code Administrator</i>	<i>Closed</i>
23/12 - 03	<i>Kathryn Adeseye to update the IGT UNC Workgroup on the portfolio transfers with the relevant CDSP information.</i>	<i>CDSP</i>	<i>Closed</i>
24/01 - 01	Kathryn Adeseye to provide an update on the ROM for IGT173 – Gateway Delivery for RPC data, at the February IGT UNC Workstream.	CDSP	Open
24/01 - 02	Nick King to review and revise where necessary the following sections of the redrafted TPD Section I for IGT172 to ensure clarity: <ul style="list-style-type: none"> • 2.2 – Amendment of Network Entry Provisions • 2.5.3 – Measurement Provisions • 2.6.5 – Local operating Procedures, “Transportation Constraint” • 3.1.2 – Pipeline Entry Point daily quantity delivered • 3.4.2 – Amount Payable by Delivering Pipeline User • 3.6.1 – Network Entry Provisions • 3.9 – Restricted Delivery of gas • 3.11.9 Gas venting 	Nick King	Open
24/01 - 03	Parties to review the legal drafting for IGT172 – Provisions for Gas Entry within the IGT UNC in advance of the February 2024 IGT UNC Workstream.	All Code Parties	Open
24/01 - 04	Feedback concerning governance and charging related to the IX and referenced in Business Rule 3 of IGT173.	IGTs	Open

24/01 – 05	Kirsty Dudley to amend: business rules 1, 9, 12, 13 following discussions at the IGT UNC Workgroup, ahead of the production of the Rough Order of Magnitude (ROM) by the CDSP.	Kirsty Dudley	Open
24/01 – 06	IGTs consider implications of UNC0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers and the need for a solution to cover the IGT UNC.	IGTs	Open

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