

IGT UNC 24-02 Modification Workstream Meeting

Draft Minutes

Thursday 8th February 2024 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Alison Cartwright	AC	CNG Services	Present for item 5
Cher Harris	CH	Indigo Pipelines	
David Morley	DM	OVO	Proposer and present for IGT165
Eilidh McNally	EM	Last Mile Gas	
Graeme Hunter	GH	Barrow Shipping	
Isaac Moore	IM	Gemserv	Code Administrator
Jenny Rawlinson	JR	BUUK	
Josie Lewis	JL	CDSP	
Kathryn Adeseye	KA	CDSP	
Kirsty Dudley	KD	E.ON UK Plc	Proposer for and present from IGT173
Lee Greenwood	LG	British Gas Centrica	
Nick King	NK	Barrow Shipping	Proposer and present for IGT172
Harry Firth	HF	Gemserv	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting and accepted apologies received from Charlotte Gilbert and Helen Bevan.

2. Confirmation of Agenda

The Chair informed the Workgroup that KD would not be able to join the meeting until later, so proposed that items 5 and 6 would be swapped from the order set out in the Final Agenda. The Chair asked attendees for ‘Any Other Business’ (AOB) items, which there were none.

3. Approval of the Previous Minutes 22-08

HF informed the Workgroup that no comments were received for the draft 24-01 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

HF informed the Workgroup that there were 6 outstanding actions as follows:

- **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.** KA informed the Workgroup that the ROM response has been published earlier that week. Action Closed.
- **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.** The Workgroup decided to revisit these sections of the redrafted legal text at a future meeting with legal teams present. Action carried forward.
- **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.** The Workgroup agreed to continue internal review of the legal drafting in advance of a future meeting with legal teams present. Action carried forward.
- **24/01 – 04: Feedback concerning governance and charging related to the IX and referenced in Business Rule 3 of IGT173.** Feedback was provided by the Workgroup during the Proposer’s presentation of the amended modification proposal and business rules. Action closed.
- **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.** KD presented amended business rules to the Workgroup. Action closed.
- **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.** Action carried forward to next Workgroup meeting as time constraints prevented discussion of implications of UNC0854.

24/02 – 01: Meeting to be arranged with legal teams of interested parties to consider legal drafting of IGT172 – Provision for gas entry within the IGT UNC ahead of March Workstream meeting.

MODIFICATIONS

5. IGT172 – Provision for gas entry within the IGT UNC

The Proposer invited the Workgroup to provide feedback to the legal drafting of TPD Section I Entry Requirements for the purpose of the IGT UNC, and a mark-up of the IGT UNC. JR, AC and GH all stated that following internal review, they were comfortable with the legal drafting. AC and GH also stressed the significance of IGT172 to their respective organisations and expressed support for the modification and the legal wording introduced to date. The Chair reminded the Workgroup of the importance of strenuous feedback for the modification, especially from both IGTs and shippers. They also asked AC if they would consider attending a future meeting to assist with completion of the Workgroup Report for the modification. AC agreed to this.

The Chair invited NK to present the amendments they had made to IGT172. The Chair explained that this section is based on the legal drafting of UNC Section I and would form a new Section Q in the IGT UNC.

The Proposer went through the changes made to the legal drafting of TPD Section I Entry Requirements since the last Workgroup meeting. They advised that the proposed new definition of “Pipeline Entry Point”, had been moved about and some of the wording in this section has been amended to closer reflect the UNC version.

The Proposer also asked for feedback on Section 1.2.4, as the IGT UNC does not have a direct equivalent of UNC Section J, so it had been difficult to make corresponding changes for the IGT UNC legal drafting to marry alongside the UNC legal drafting. They suggested including some consolidating legal text on exit purposes in IGT UNC Section A.

JR suggested that given the lack of feedback, whether the present group and parties present were the right people to review the legal text, and should the proposed changes be taken away and internally reviewed by the appropriate teams. The Chair asked the Workgroup if a separate meeting to discuss the legal drafting for IGT172 may be beneficial. This could allow any legal teams of interested parties to attend and prevent any further delays to the modification. They also emphasised the importance of this modification for IGT UNC, and by having such a meeting to go through the legal drafting, it would show Ofgem that the IGT UNC has made a significant effort to give the legal text proper consideration and to reduce risk. JR and NK both agreed that such a meeting would be helpful.

JR suggested that NK’s outstanding actions on amendments to the legal drafting should be left open and be covered in this future meeting. The Chair agreed and suggested that the drafting for Part Q be discussed then when the legal teams of any interested parties will have had chance to review the drafting. NK agreed to keep the actions open for now and asked KA if there was any feedback from the CDSP. KA responded that they had nothing to add as there are no impacts on the CDSP for this modification.

The Proposer went through a presentation on the impact of the modification on the different sections of the IGT UNC. They asked for feedback on the proposed amendment for the definition of “pipeline”, adding the effort to keep these changes to a minimum, but this addition to the definition forms a core part of the new Part Q. JR expressed support for the amendment and there were no further comments from the Workgroup.

GH expressed support for IGT172 from a shipper’s perspective. GH highlighted that the modification would not be adding anything new regarding entry requirements and provisions for most shippers. GH also stressed the importance of marrying this modification to [UNC 0842 - Gas Entry onto the Total system via an Independent Gas Transporter](#) and in supporting new green gas producing facilities and the de-fossilisation of the gas grid. Both the Chair and JR thanked GH for these comments as it is useful to hear supporting comments and feedback from a Shipper.

KA asked NK about UNC Section I, 3.12.5 b, ii, a clause which relates to CDSP processes. UNC 0842 is planning to amend this clause as part of the modification. The legal drafting for IGT172 has no identical counterpart to this clause, but KA identified TPD Section I, section 1.3.1 as the closest clause. KA asked NK if the legal drafting is based upon the amended version of Part I as proposed as part of UNC 0842. The Proposer said that the particular section (3.12.5) will not be fully replicated in the IGT172 legal drafting as the DNO arrangement is not relevant to the IGT UNC.

Finally, the Proposer showed the Workgroup a mark-up of the IGT UNC, showing the proposed legal changes. The Proposer emphasised that this drafting had been done to closely align with UNC TPD Section I, to make the task of potential consolidation between the UNC and IGT UNC easier in the future. The Chair added that the IGT UNC and UNC would be consolidated in future, in line with the publishing of a recent Ofgem consultation. The Proposer asked if this could be noted in the meeting minutes. The Chair agreed and stated this would also be included in the Workgroup Report.

The Chair suggested that the next step for the modification is to arrange a meeting of the legal teams to work through the legal drafting ahead of the next Workgroup, where the Workgroup Report will be completed and then the modification would return to the March IGT UNC Modification Panel meeting. The Workgroup agreed.

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

The Proposer outlined the changes made to the modification since the January Workgroup meeting.

JR queried KD that in the Business Rules, if IX goes down, then the CDSP will notify the relevant parties, but in the legal drafting, this responsibility shifts to the IGTs. KD responded that IGTs would be notified through IX's delivery mechanisms whether there has been an issue sending the RPC backing data. In the event of a catastrophic incident, DSC contract managers would be notified as standard procedure, as specified in the UK Link Manuals. KA added that much of these scenarios are covered in the ROM which will be discussed later. KA stated that if any file does not send correctly, the file will go into an error folder in IX, and a delivery receipt will be received if the file sends correctly.

JR also queried about contact details. They added that the IGT UNC does not mandate contact details to be provided and are concerned that as part of the legal drafting, the IGTs are being asked to contact Shippers in the event of a system failure when these contact details are not readily available. KD responded that this could be investigated further when discussing the legal drafting, and during a testing period or post-implementation review, perhaps by raising a separate modification.

The Chair invited KD to share the amendments to the Modification Proposal with the Workgroup. KD asked the Workgroup whether Market Participant ID (MPID) should be added as a defined term in the IGT UNC, as it is in UNC GT D6.1.5, and it has been used in a working example in the modification proposal. The Chair informed the Workgroup that MPID has not been used in the legal drafting and

there is an example in the ancillary document. They added that it did not seem necessary to add in this term into code for this modification.

JR-LG asked KD if the RPC backing data template will change. KD confirmed that the template will not be changed, and the only refinement is the file naming, to ensure the file is sent to the correct address.

LG asked about reading that shippers may still receive the RPC data via email, despite the business rule mandating shippers to receive RPC data via IX. KD explained that email would be used to send the RPC data in the event of total system failure, referring to the cut-off point of 5pm on the 5th business day of the month for the IGTs to send the RPC data. Email can be used to ensure that IGTs can meet this deadline in the event of IX system failure. KD added that email would only be used in the event of catastrophic system failure, so that the IGTs can meet their delivery.

LG also asked whether only RPC backing data will be sent via IX, and the invoice will remain as being sent via email. KA confirmed this and JR added that invoices will continue to be sent in its current form, via either email or a portal.

LG asked about whether the RPC backing data will need to be sent in a certain file format. KD confirmed that the RPC data will have to be in a CSV format as it is currently, but the file naming convention will be adopted to allow the file to be sent through the IX. The content of the file will remain as current.

KA added to Business Rule 6, that Communication Type 2 acts as a post-box functionality. The CDSP will take the address on the front of the file and send it onto that address. If the address is incorrect, and commercially sensitive information is sent to the incorrect party, the CDSP is not responsible, as it is unable to validate the address, or view the secure content inside the file. The IGTs will be responsible for putting the correct address on the file. The CDSP are only responsible for reading the address correctly. CH added that the risk of mis-addressing the file is being mitigated by this modification and such a risk already exists with the current system of sending RPC backing data via email.

JR suggested that in the event of a catastrophic system failure, there is a chance that IGTs would not be able to send the RPC backing data via email by 5pm on the 5th business day of the month, as per Business Rule 7. They asked KD if the legal text reflects this risk. The Chair clarified that in the legal drafting, it states that email can be used to send the RPC backing data if the cut off cannot be met by the IGTs, in the event of catastrophic system failure. JR added that the text clarifies that if the RPC backing data has not been received by the cut off, it does not mean that the invoices should not be paid on time. KD confirmed this.

The Proposer noted that in business rule 9, there could be an issue regarding contacts, as the list of DSC contract managers kept by the IGT UNC may not be up to date. They referred to JR's earlier comment. The Proposer suggested that it would probably have to be addressed as part of a post-

implementation review process, purely focusing on the links to the delivery of the modification, rather than sponsoring a separate modification on mandating contact details. JR agreed with this.

The Proposer asked the Workgroup for feedback on Business Rule 9, (ii), which states that in the event of a missing file, the Shipper should contact the IGT Contact held by the code administrator, which is the current system. JR suggested that this could also be discussed in a post-implementation review, as it may be linked to the same issue regarding up-to-date contacts.

The Proposer also asked the Workgroup for feedback on Business Rule 9, (iii), which states IGTs can opt for disaster recovery support provided by the CDSP, where in the event of IX going down, IGTs can use disaster recovery kits to send RPC backing data files. This business rule was discussed in the previous workgroup. KA advised that both parties would need to have disaster recovery support for one to send files to the other. Disaster recovery is an optional service for DSC customers and there are additional associated costs outlined in the DSC charging statement. If an IGT's customer does not have the service, the IGT would not be able to send it in the event of IX going down. The Chair asked KA if a party has signed up for the disaster recovery service, that they would be able to see which other parties are also signed up. KA responded that they would have to confirm the answer but assumed that the CDSP would not be able to share this information about other customers. The Chair added that the IGT would not know which shippers can receive the file. KD suggested that this business rule is removed in favour of email being used as the contingency option in the event of IX going down. The Chair, JR and KA all agreed, and this business rule was removed. The Proposer added that the CDSP are happy to discuss the disaster recovery service in more detail with any interested parties.

JR asked if there are SLAs around the IX mechanism in the event of IX going down. KA and KD both confirmed this.

KA added for business rule 9, (iii), that the CDSP will contact the DSC contract manager in the event of catastrophic system failure, when IX goes down. For individual files that do not send, it will go into the error folder on IX and a delivery receipt will not be received.

The Chair added that for business rule 10, (i), that the legal drafting covers all old mechanisms of sending RPC backing data, as the code will state that each IGT should revert to their own network codes.

KA clarified for business rule 11 that it is standard for the CDSP to send files received on the same day, and this would only not happen due to situations outside of the CDSP's control, such as high network traffic which may cause delays. They added that if IGTs all send it in a small time window close to the cut off, this could cause such an issue and advised that this should be considered if IGTs aim to get the files delivered on the same business day. KD suggested that this business rule could be removed as it is already covered in the UK Link Manuals and asked for comments from the Workgroup. The Chair agreed and there were no further comments from the Workgroup, so this business rule was removed.

LG asked about business rule 13, which discusses an optional testing window one month before implementation. LG queried how to liaise with IGTs on taking part in testing, adding that British Gas would be interested in taking part. KD suggested it would be up to the IGTs and Shippers themselves to decide between them who is willing to take part in testing. CH and JR both added that their organisations would be interested in taking part in testing.

KA presented the ROM response for IGT173 to the Workgroup.

The Chair presented the legal drafting changes proposed for Part G – Pipeline Transportation Charges, Invoicing, Payment and Code Credit for IGT173 to the Workgroup.

For clause 4.8, the Chair asked the Workgroup for feedback on the relevance of the clause, as it refers to clause 4.6, which has been changed as part of the drafting. JR asked whether RPC supporting data has been specified as part of the legal drafting. The Chair confirmed this and that for the purposes of this modification, that RPC supporting data has been defined to distinguish from the defined term Invoice Documents, as only RPC supporting data will be sent via a different mechanism under IGT173.

The Chair asked the Workgroup for feedback on clause 5.1, whether the cut-off point of 5pm on the 5th business day for sending RPC supporting data should be separated from other Invoice Documents. JR and KD added that they were happy with the legal drafting as is, as from experience all of the invoice documents are sent/received together or at a similar time.

The Chair informed the Workgroup that the definition of “System Failure” is already in Code. In Code it refers to Part G Clause 21.2(c)(i), which was removed from code as part of [IGT132 - Introduction of IGT Code Credit Rules](#). This incorrect code reference was not corrected when the clause was removed from code. There are several other references in code to “System Failure” under both clauses 21.2(c)(i) and (ii), each reference with a different use. The definition of “System Failure” was moved to Part M as part of the implementation of IGT132 in Code. When this definition was moved, it was altered and removed the two separate paragraph references. The Chair’s proposed definition of “System Failure” is almost identical to the definition prior to it being moved and amended. JR suggested that the current definition of “System Failure” in Part M is removed and replaced with the Chair’s proposed definition, as well as removing the incorrect code references to Section 21. KD suggested that this could be added as an ad hoc business rule to IGT173 instead of a separate modification.

The Chair added that Section 21 on Code Credit Rules was removed as part of the legal drafting for IGT132, which removed two other definitions that are still referenced in code, “code credit rules” and “code credit limit”. JR asked whether these definitions could be reinstated as part of the modification. The Chair suggested that “Code Credit Rules” was not needed as it is the title of the section, but “Code Credit Limit” would be needed to be re-added. KD asked the Workgroup if they were happy to see this added to the modification as an ad hoc business rule. JR agreed and thanked KD.

JR queried whether there were differences between the modification business rules, and the legal drafting of clause 9.4 (a), which states that in the event system failure prevents the provision of RPC supporting data before the set deadline, it is the pipeline operator that will contact the relevant pipeline user. JR argued that in the business rule, it sets out that the CDSP will contact the relevant pipeline user in the event of system failure and added that it links to the issue of withholding user contacts. If it was an individual file rejection, then the Pipeline Operator would contact the Pipeline User. KA added that this was her understanding. The Chair suggested that the clause could be separated out further for issues relating to the CDSP and Pipeline Operators. The Chair also suggested to remove (a) to align with the business rule 9, (i) and (iv).

JR also added that the business rule stated email would be used as the contingency option if RPC backing data cannot be sent by the IGT by the set deadline, but this is not specified in 9.4 (b). The Chair agreed to amend this clause.

KA queried whether paragraph (ii) of the proposed definition of "System Failure" works for RPC backing data, as the CDSP do not "generate" this data, they act as a post-box service for this backing data. The Chair agreed to amend this clause to reflect this in the legal text. KA suggested adding a third point to separate out RPC supporting data and specific IX system failure. JR and the Chair agreed with adding a third point. The Chair added that they would ensure with KD that the legal drafting matches the modification business rules.

JR queried whether additional context was needed for Clause 44.3 to show it is used if the Pipeline Users have requested missing RPC supporting data. The Chair added that this clause is under the temporary measures chapter. KD suggested adding this to the post-implementation review, that Pipeline Users would check to ensure there is no missing RPC backing data, so that any missing data in future would be resent via IX. The Chair agreed.

The Chair suggested that in the March Workgroup, that the amended modification proposal and legal drafting for IGT173 would be reviewed and the Workgroup Report would also be completed.

7. IGT165 – Independent Shrinkage Expert and Independent Shrinkage Charge

The Workgroup invited the Proposer to provide a verbal status update on IGt165. DM has held discussions with David Mitchell, SGN, the provider of the legal text for [UNC 0843 - Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert](#). DM added that some of the business rules have been moved around and will become further solution notes rather than becoming part of the legal text. David Mitchell is currently in discussions with his legal team over the latest drafting of the legal text. DM has shared this version with Xoserve and the Joint Office and added he is happy to share this with any in the Workgroup that are interested in reviewing the document ahead of the paper submission date of Wednesday 14th February for the next Workgroup meeting.

The Chair asked DM for an update on when the UNC legal drafting was due. DM responded that it is expected to be requested at the UNC Modification Panel on Thursday 15th February. The Chair asked if DM had seen any of the legal drafting for UNC 0843. DM responded that the drafting had not been

started yet, but they had had conversations with David Mitchell over some of the business rules. DM added that the next Workgroup for UNC 0843 will be at the Distribution Workgroup on Thursday 22nd February. The Chair encouraged those with an interest in the modification to attend. The Chair also suggested that DM can provide another verbal update on IGT165 at the IGT UNC March Workgroup meeting. DM agreed.

AOB

The Chair asked the Workgroup for feedback on the Cross-Code Implications Tracker and Known Issues Register as due to time constraint, items 8 and 9 were not covered in the meeting and would be deferred. They added that these items need to be covered in the March Workgroup. JR agreed and suggested that these items are moved up the agenda for the next Workgroup. The Chair suggested that the Workgroup meeting is extended to 4pm. JR argued that this would make the meeting too long and the Chair agreed.

The Chair informed the Workgroup that Ofgem have changed the Expected Decision Date for [IGT169 - Aligning the Capacity requirements for NExA Supply Points in the UNC with Capacity requirements for LDZ CSEP Ancillary Agreement \(LCAA\) Supply Points under the IGT UNC \(i.e. bringing Code in line with UNC0701 and UNC0853\)](#) to 1st April from 28th June.

The next Workgroup meeting is scheduled for Thursday 14th March 2024.

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Annex 1 – Actions Table

Reference	Action	Owner	Status
24/01 – 01	<i>Kathryn Adeseye to provide an update on the ROM for IGT173 – Gateway Delivery for RPC data, at the February IGT UNC Workstream.</i>	<i>CDSP</i>	<i>Closed</i>
24/01 – 02	<p>Nick King to review and revise where necessary the following sections of the redrafted TPD Section I for IGT172 to ensure clarity:</p> <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	Carried Forward to Future Meeting on IGT172 Legal Drafting
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	Carried Forward to Future Meeting on IGT172 Legal Drafting
24/01 – 04	<i>Feedback concerning governance and charging related to the IX and referenced in Business Rule 3 of IGT173.</i>	<i>IGTs</i>	<i>Closed</i>
24/01 – 05	<i>Kirsty Dudley to amend: business rules 1, 9, 12, 13 following discussions at the IGT UNC Workgroup, ahead</i>	<i>Kirsty Dudley</i>	<i>Closed</i>

	<i>of the production of the Rough Order of Magnitude (ROM) by the CDSP.</i>		
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	Carried Forward to 24-03 Workgroup
24-02 / 01	Meeting to be arranged with legal teams of interested parties to consider legal drafting of IGT172 – Provision for gas entry within the IGT UNC ahead of March Workstream meeting.	Code Administrator	Open

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