



IGT UNC 24-04 Modification Workstream Meeting

Draft Minutes

Thursday 11th April 2024 via Teleconference

| Attendee | Initial | Organisation | Notes |
|-------------------|----------------|---------------------|---------------------|
| Anne Jackson | AJ | Gemserv | Chair |
| Charlotte Gilbert | CG | BUUK | |
| Cher Harris | CH | Indigo Pipelines | |
| Claire Roberts | CR | Scottish Power | Presenter of Item 7 |
| Helen Bevan | HB | Gemserv | Code Administrator |
| Kathryn Adeseye | KA | CDSP | |
| Lee Greenwood | LG | Centrica | |
| Martin Gwilliam | MG | Scottish Power | Presenter of Item 7 |
| Michelle Brown | MB | Energy Assets | |
| Neil Craven | NC | Scottish Power | Presenter of Item 7 |
| Nick King | NK | Barrow Shipping | |
| Harry Firth | HF | Gemserv | Secretariat |

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting and accepted apologies received from David Morley.

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 over and above those previously notified.

3. Approval of the Previous Minutes 24-03, 24-02, Additional IGT172 Meeting

HF informed the Workgroup that no comments were received for the draft 24-03 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.

HF presented the amendments made to the draft 24-02 Modification Workstream meeting minutes to the Workgroup. These amendments included greater detail included on KA's presentation of the IGT173 ROM response. 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.

HF presented the amendments made to the draft Additional IGT172 meeting minutes to the Workgroup. These amendments included the changes made and presented by NK at the March Workgroup 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 three outstanding actions as follows:

24/03 – 01: Code Administrator to republish meeting minutes from February 2024 IGT UNC Workstream meeting and Additional IGT172 meeting prior to April 2024 IGT UNC Workstream meeting. Both sets of meeting minutes were published ahead of the meeting and were approved by the Workgroup as part of Item 3. Closed.

24/03 – 02: Code Administrator to review the legal drafting of UNC modifications 0866 and 0867 to determine the impacts upon the IGT UNC. The Chair informed the Workgroup that they had not reviewed the legal drafting for [UNC 0866 - Amendments to Demand Side Response \(DSR\) Arrangements](#) and [UNC 0867 - Gas Demand Side Response \(DSR\) Aggregation Arrangements](#) yet, but hoped to do so for the May IGT UNC Workgroup meeting. CG added that they believed neither modification would have an impact on the IGT UNC. They added that for 0866, the IGT UNC already references to the amendments to DSR arrangements but could not be certain for 0867 until the modification legal text was available. The Chair thanked CG for the feedback and added that those comments would be added as notes to the Cross Code Modification Implications Tracker. Action carried forward for review at the May IGT UNC Workgroup.

24/03 – 03: Code Administrator to raise the issue of fax references (UNC 0864) at the next Cross Code Steering Group (CCSG). HB informed the Workgroup that they had contacted the CCSG Chair Lorna Mallon regarding [UNC0864 - Update of UNC Code Communication Methods](#) and REC R0157 – Removal of Facsimile as a Method of Code Communication. Lorna Mallon informed HB that it had been decided that this was not a cross-code issue, it is up for each code to do as they see fit, although that might have been more of an Electricity discussion led by the BSC. They added that in REC, they left the fax numbers in Code when it was not the only method of communication, so the modification went through the housekeeping route and is pending implementation.

KA added that the UNC are reviewing the legal text for UNC 0864 in the Governance Workgroup later on Thursday 11th April. They added that it is aimed for the ROM to be presented and the final workgroup report to be completed at the Workgroup. The Chair asked KA if they could share what the UNC have determined to do. KA responded that the UNC have taken a bespoke approach and have gone through every reference to fax in the UNC code in detail, making the legal text quite extensive. KA added that the timescales for implementation of UNC 0864 are unknown, noting that the cut-off point is the end of 2025. The Chair noted that the use of a bespoke approach indicates there will be no universal way to deal with fax references, and the IGT UNC will likely have to find its own bespoke approach. They added that in the Cross Code Modification Implication Tracker, it will need to be decided how to determine this approach. They suggested either a review group to consider different options or a modification to be raised. Action closed.

5. Cross Code Modification Implications Tracker

Watch List

The Code Administrator took the Workgroup through the added Modifications. HB noted that several new modifications had been raised since the Cross Code Modification Implications Tracker was published last week and will be added for review next month.

0870 - Amendments to Wobbe Index and Calorific Value Lower Limits at NTS System

Entry Points: HB informed the Workgroup that this modification was highlighted by the UNC Panel as having a potential IGT UNC impact. They added that the Proposer, Phil Hobbins from National Gas Transmissions disagreed as the modification does not propose to make changes to the UNC legal text. The Chair agreed with the Proposer's view. CG added that they could not see any cross-code impacts, but also stressed the highly technical nature of the modification, suggesting that this may be why the UNC Panel have left the door open to potential IGT UNC impacts. The Chair informed the Workgroup that the Proposer explained that this modification is essentially a notice to a change in legislation surrounding the legal Wobbe indices and calorific values at entry points, and that some entry point may be changing these values as a result, with no legal drafting required for the modification.

The Chair asked NK if they had any information on the modification. NK responded that they had not been close to the development of the modification. They added that there are gas Safety Management Regulations which state the permitted limits for calorific values at entry points. NK added that the UNC does not refer to this as such, rather the National Transmission Operator has a 10-year statement which includes an indicative gas entry specification. They added that new entry points would have a Network Entry Agreement in which the gas entry specifications for that entry point would be included, with these specifications falling within the legal limits. NK added that even with these legal limits for calorific values widening, these individual entry points will still have to abide with the tighter limits set out in these Network Entry Agreements, unless the parties make a proposal to change the limits as per UNC TPD Section I. NK added that this modification was helping to enable these future changes, as the industry would feel that the legislation change has been discussed in detail and the processes followed to ensure transparency around any changes to the Network Entry Agreements at entry points.

The Chair asked the Workgroup if they would like to draw conclusions on [0870 - Amendments to Wobbe Index and Calorific Value Lower Limits at NTS System Entry Points](#). CG and NK responded that it may be best to leave it open for future discussion. The Chair noted that the modification is going to the UNC Transmissions Workgroup, and asked if anyone would be attending this Workgroup to feed back any updates to the modification. KA responded that there is a CDSP representative at the Workgroup, adding that they are happy to provide the Workgroup with a high-level overview of the modifications and any progress made.

24/04 – 01: KA to feedback on discussions at the next UNC Transmissions Workgroup for UNC 0870

IGT UNC Impact Assessment

0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier

Demand Event Triggers: KA queried if the information for this modification is up to date, adding that when the modification was discussed at the March Workgroup meeting, both the Chair and CG had stated they believed an IGT UNC equivalent modification was not required. CG agreed. KA informed the Workgroup that the solution to [0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#) will apply to both Gas Transporters (GTs) and IGT sites. The Chair agreed that an IGT UNC equivalent modification would not be required but would check the legal drafting to confirm there is no impact. KA added that the UNC Panel have recommended for this modification to be implemented and it has been sent to Ofgem.

The Chair asked KA to clarify the impacts to both GT and IGT sites as part of the modification solution. KA explained that currently any supplier who ceases to operate enters termination processes, such as the Revision of Virtual Last Resort User and Contingent Procurement of Supply and Demand Event Trigger Processes. KA added that National Gas Transmission want to widen the scope of these termination processes to allow a sanctioned shipper to be covered by these processes too. KA added that there will be a caveat that allows a shipper to re-enter the market should the sanctions be lifted, but this does not mean they will keep all their sites, some of which will sit on IGT networks. The Chair added that for shippers, as they must sign up to the UNC to operate, and thus the IGT UNC as well, so any sanctioned shipper would not be able to operate under either code.

NK asked if any sanctioned shipper responsible for a site on an IGT network with a meter point reference number, would the IGTs need to be informed which of these sites should not have levied their RPC transportation charge> KA responded that this is a business-as-usual process already in place for terminated users that will now apply to sanctioned users, and they are unsure on the low-level details. The Chair added that it is important to know how the information of a sanctioned user is passed onto the IGTs. CH responded that IGTs would expect to receive an email from the CDSP or Xoserve. CG added that it is also made known through Ofgem updates. The Chair asked which organisation would publish the information that a shipper is being sanctioned. KA responded that they are not sure, and the modification was drafted to piggyback off these existing processes for terminated users. They added that they are happy to find out what communications are currently sent out by the CDSP regarding terminated users, noting it would be useful for the Workgroup to know.

24/04 – 02: KA to find out current CDSP communications regarding terminated users

0875 - Minor amendment to the Vacant Site exit process & 0819 Legal Text re-numbering: CG informed the Workgroup of a new modification raised recently in the UNC which is to act as a housekeeping modification making minor amendments to UNC [0819 - Establishing/Amending a Gas Vacant Site Process](#). CG added that the new modification specifically says there will be no impact on the IGT UNC equivalent modification to UNC 0819, [IGT168 - Establishing/Amending a Gas Vacant Site Process](#), and would like to clarify this. KA responded that they have seen the initial, but not yet published legal text for UNC [0875 - Minor amendment to the Vacant Site exit process & 0819 Legal Text re-numbering](#) and did not think there are any impacts to the IGT UNC because the relevant sections of the IGT UNC text, Sections 6 and 21, both already refer to the relevant sections of the UNC, so when these UNC sections are updated through this new modification, the updates will automatically apply to IGT sites. KA added that part of the modification is renumbering as when UNC [0816 - Update to AQ Correction Processes](#) was implemented, some of the numberings in the UNC 0819 legal drafting became incorrect. KA added that there is also a slight tweak to the business rules suggested addressing the convoluted exit process from a “vacant site” status. The Chair clarified that there is an impact from UNC 0875 on IGT sites, but not the IGT UNC code. KA agreed.

0871 - Facilitating IGTs with NTS Entry. The Chair noted that the other newly raised modifications would have to be reviewed for IGT UNC impacts at a future date. They asked NK for any information on [0871 - Facilitating IGTs with NTS Entry](#) as it has been raised by a colleague at Barrow Shipping and it would appear to have an IGT impact. NK responded that they did not really have much information on the modification and that they had not been close to the development of the modification. The Chair added that as a newly raised modification, there would be time to review it at a later date.

6. IGT UNC Known Issues Register

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

AOB

7. Advanced Shipment Notification (ASN) Files

CR explained to the Workgroup that MG and NC have been managing the process of receiving historic ASN files and have been interacting with IGTs as part of this process. They added that they would like to find an enduring solution as many of the historic ASN files from IGTs remain outstanding. CH queried what an ASN file is, adding that they have not been approached about this previously. MG explained that the ASN file is essentially a file which includes an install code for smart meters which allows Scottish Power to commission and communicate with the device. They added that in some instances, IGTs are almost refusing to provide ASN files, or are not providing them in a timely manner. NC added that some IGTs that have indicated that to provide the detail in

ASN files sometimes requires going back to the manufacturer of the meter to obtain the install codes, NC's expectation was that these should be provided upon purchase.

MG added that this is causing issues with customers, especially those moving into new-build homes. If the gas meter is not commissioned in the home, the customer may contact Scottish Power to replace the meter. If Scottish Power decide to exchange the meter, there are additionally commercial implications as well as customer detriment.

The Chair asked if the ASN file is an IGT UNC file or a metering file. MG responded that they believe it is a metering file. The Chair queried where the ASN file is specified in governance, adding that they are trying to establish if this is within the IGT UNC domain. MG responded that they are unsure. CG added that they had researched ASN files prior to the meeting and had found some old SEC modifications, but also could not locate where exactly the ASN governance lived. The Chair suggested that given Scottish Power have been receiving ASN files from some IGTs, a kind of standard process has been adopted at some point. They added that the next step is to establish the right area of governance for ASN files, adding they can contact the REC and SEC code managers to see if either of them can locate the governance under their respective codes.

24/04 – 03: Code Administrator to contact REC and SEC Code Managers to determine which governance framework ASN files fall under

CH added that IGTs are not normally involved in the commissioning of smart meter they provide under the Provider of Last Resort Obligation. MG queried if IGTs have a duty of responsibility to ensure that the meters are smart. CH responded that there is no IGT responsibility in relation to smart meters, as the Provider of Last Resort Obligation predates smart meters.

MG added that they believed this could be an industry-wide issue, not just restricted to Scottish Power. They added that the smart meter was not commissioned in their own new-build house, which is connected to an IGT network. MG added that they are with British Gas, suggesting that British Gas may also face the same issue.

LG added that they could see the ASN file is from Xoserve. CR and MG responded that there are two different ASN files, the one in question is not from Xoserve, the ASN file from Xoserve is used for faster switching.

8. IGT173 Testing Period

The Chair informed the Workgroup that E.ON have requested for IGTs and Shippers interested in taking part in the testing period for [IGT173 – Gateway delivery for RPC Data](#) to get in touch. They added that E.ON are particularly interested in testing scenarios and timings that interested parties are looking for. E.ON will then use this information to create a straw man testing approach which will be brought to a future Workgroup for refinement.

24/04 – 04: IGTs and Shippers to provide information to E.ON UK on potential scenarios and timings for IGT173 testing period

The next Workgroup meeting is scheduled for Thursday 9th May 2024.

DRAFT

Annex 1 – Actions Table

| Reference | Action | Owner | Status |
|------------|--|---------------------------|--|
| 24/03 - 01 | <i>Code Administrator to republish meeting minutes from February 2024 IGT UNC Workstream meeting and Additional IGT172 meeting prior to April 2024 IGT UNC Workstream meeting.</i> | <i>Code Administrator</i> | <i>Closed</i> |
| 24/03 - 02 | Code Administrator to review the legal drafting of UNC modifications 0866 and 0867 to determine the impacts upon the IGT UNC. | Code Administrator | Carried forward to 24-05 IGT UNC Workgroup |
| 24/03 - 03 | <i>Code Administrator to raise the issue of fax references (UNC 0864) at the next Cross Code Steering Group.</i> | <i>Code Administrator</i> | <i>Closed</i> |
| 24/04 - 01 | KA to feedback on discussions at the next UNC Transmissions Workgroup for UNC 0870 | KA | Open |
| 24/04 - 02 | KA to find out current CDSP communications regarding terminated users | KA | Open |
| 24/04 - 03 | Code Administrator to contact REC and SEC Code Managers to determine which governance framework ASN files fall under | Code Administrator | Open |
| 24/04 - 04 | IGTs and Shippers to provide information to E.ON UK on potential scenarios and timings for IGT173 testing period | IGTs and Shippers | Open |