



IGT UNC 24-05 Modification Workstream Meeting

Draft Minutes

Thursday 9th May 2024 10:00am 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	
Helen Bevan	HB	Gemserv	Code Administrator
Josie Lewis	JL	CDSP	
Kathryn Adeseye	KA	CDSP	
Kirsty Dudley	KD	E.ON UK	
Michelle Brown	MB	Energy Assets	
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 Lee Greenwood (Centrica)

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 24-04

HF informed the Workgroup that no comments were received for the draft 24-04 Modification Workstream meeting minutes prior to the meeting. The Workgroup had no comments to add to the minutes at the meeting and they were approved as a true and accurate record of the meeting.

4. Outstanding Actions

The Chair informed the Workgroup that there were 5 outstanding actions as follows:

- **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Chair informed the Workgroup that [UNC 0867 - Gas Demand Side Response \(DSR\) Aggregation Arrangements](#) had been withdrawn, and asked if anyone had any further information. CG responded that the Proposer, National Gas Transmission had withdrawn the modification due to a lack of interest

and support from impacted parties and thus the low cost-effectiveness of the modification. The Chair added that [UNC 0866 - Amendments to Demand Side Response \(DSR\) Arrangements](#) would be fully implemented within the IGT UNC as the IGT UNC points to the relevant sections of the UNC Code.

Action closed.

- **24/04 – 01: KA to feedback on discussions at the next UNC Transmission Workgroup for UNC 0870.** KA provided the Workgroup with a summary of discussions for [UNC 0870 - Amendments to Wobbe Index and Calorific Value Lower Limits at NTS System Entry Points](#) at the last UNC Transmission Workgroup meeting. KA added that IGTs were not included within the impacted parties on the modification documents, but noted this was the first Workgroup for UNC 0870 and the modification is still in development. Action closed.
- **24/04 – 02: KA to find out current CDSP communications regarding terminated users.** KA informed the Workgroup that the CDSP is currently obliged to issue out notifications to all Code parties if a user is terminated. KA added these cessation notices are sent on behalf of Gas Transporters and IGTs and are handled by the CDSP's Customer Lifecycle team. The action linked to understanding [UNC 0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#). KA added that National Gas intend to piggyback off the existing termination policies and extend these rules to sanctioned users.

Action closed.

The Chair noted the Expected Decision Date for UNC 0854 was Friday 10th May, and queried whether any changes would be needed in the IGT UNC. KA responded that this had been discussed in a previous Workgroup, that they had suggested the IGT UNC may need to raise their own modification. The Chair had reviewed the legal text for UNC 0854 and indicated that the legal text for the UNC modification would have no impact on the IGT UNC. CG asked what would happen to IGT charges on a sanctioned User if said User cannot operate under the UNC and therefore the IGT UNC. KD suggested that this is not a new problem, and the same issues would arise currently with a terminated User. The Chair responded that they did not believe this problem currently exists, and the main issue is the IGT UNC does not currently recognise this new status for terminated Users as proposed by UNC 0854, which could need addressing. NK suggested that this may already be covered under the IGT UNC, having gone through the Termination section when producing the legal text for [IGT172 – Provision for gas entry within the IGT UNC](#). The Chair responded that they would review the

IGT UNC and the legal text for UNC 0854 to determine if any further action might be needed to be taken by the IGT UNC in relation to this modification.

24/05 – 01: Code Administrator to review the IGT UNC and UNC 0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers to determine whether the IGT UNC rules on terminated users require further review.

- **24/04 – 03: Code Administrator to contact REC and SEC Code Managers to determine which governance framework ASN files fall under.** HF informed the Workgroup that the REC had confirmed that ASN files do not fall under their governance. They added that upon further research, ASN files appeared to be sent from the Data Communications Company (DCC) to SEC parties regarding the supply of communications hubs. HF added that they had reached out to SEC to confirm this and would pass on this information to Scottish Power once it had been received.

Action carried forward to 24-06 Workgroup.

- **24/04 – 04: IGTs and Shippers to provide information to E.ON UK on potential scenarios and timings for IGT173 testing period.** KD informed the Workgroup that they had received some light feedback from interested parties and suggested it may be best to add an additional agenda item to the next Workgroup or arrange a separate meeting to discuss potential scenarios for testing. They added that Xoserve had indicated that the testing would be available a month before full implementation and once the Change Pack comes back from Xoserve, they can pull together a Straw Man.

Action carried forward to 24-06 Workgroup.

MODIFICATIONS

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

KA informed the Workgroup that the ROM response for the UNC mirroring modification [UNC 0843 - Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert](#) was now finalised, and was presented at a previous UNC 0843 workgroup, DM informed the Workgroup that there were no updates for IGT165, but for UNC 0843, the legal drafting was in the midst of being produced, and they were involved in ensuring the legal text is representing the business rules accurately. They added that an updated version of the legal text will be presented at the next UNC 0843 Workgroup on 5th June 2024. The Chair added that they are watching updates on the legal text and will start to produce the IGT165 legal text when the UNC 0843 legal text is finalised. They added they expect the legal text for IGT165 to point to the governance of the Shrinkage Expert under the UNC and to replicate any supply point level requirements in the UNC 0843 legal text.

KD asked if there will be a need for a ROM response especially for IGT165. The Chair responded that there probably is not a need for a separate ROM response as they do not foresee any specific IGT UNC implications or requirements different to the UNC modification. They added that there would be a need for a separate ROM response if IGT sites were excluded from the UNC solution as that would be a cost on the CDSP to actively exclude sites.

KA added that the solution for UNC 0843 is for IGTs to utilise Gemini to purchase gas to cover their Independent Shrinkage Charge, so IGTs would need a contract with a party to purchase gas on their behalf, which would require changes to IGT licences to facilitate that. The Chair added that had the IGT UNC modification not been raised, the allocation to IGT sites would still happen in the UNC and IGTs would still be required to put gas in, but the governance of the process to do so would not be in place for IGTs. They added that at the moment the GDNs are responsible for adding gas back into the Total System in the event of shrinkage, including that from an IGT network. KA queried this as they believed in the UNC that it states that IGT shrinkage is zero. The Chair confirmed this and added that GDNs have the power under IGTAD to charge IGTs for this shrinkage, but it has been deemed as insignificant enough to not put any requirements on IGTs. They added that the amount of shrinkage does not include where on the network this shrinkage occurred, but if the GDNs put in the amount of gas (as a percentage) equal to the entire level of shrinkage, it must include the gas lost on IGT networks.

CH asked DM that if the solution suggests that IGTs would contract with a Shipper for access to Gemini, are there shippers that want to provide that service and is there an indication of the costs of this service or any additional costs on IGTs. DM responded that some shippers already provide a similar service to Gas Distribution Networks.

The Chair asked DM about the next steps of the modification. DM responded that an updated version of the legal text will be presented at the next UNC 0843 workgroup, so it should be available by the end of May. The Chair asked if the Workgroup Report and legal drafting will be finalised in this next Workgroup. DM responded that the solution section of the modification is stable and indicated that the Workgroup Report will likely be finished in July. The Chair suggested that the legal drafting for IGT165 will need to be discussed at the next IGT UNC Workgroup in June. KD added that they will likely be present at this Workgroup to present an item on testing for IGT173, which would ensure there will be Shipper representation. The Chair thanked KD. They added that it is planned to publish the legal drafting for IGT165 for the next IGT UNC Workgroup paper day on 6th June 2024. The Chair added that they did not expect the legal drafting to be too complex and the Workgroup Report could also be completed, meaning the modification could be sent to IGT UNC Panel at the end of June, but more likely July.

6. Cross Code Modification Implications Tracker

HB provided the Workgroup with the following updates:

Watch List

- **[UNC 0875 - Minor amendment to the Vacant Site exit process & 0819 Legal Text re-numbering:](#)** The modification was raised to act as housekeeping for [UNC 0819 - Establishing/Amending a Gas Vacant Site Process](#) and it had been clarified before that there will be impacts upon IGT sites but not the IGT UNC code.
- **[UNC 0871 - Facilitating IGTs with NTS Entry:](#)** This modification would appear to have an IGT impact. NK suggested keeping a watching brief on the development of this modification and the Chair agreed. KA added that there had been discussions at the UNC Transmission Workgroup about putting together some working examples for how the new process will facilitate IGTs with NTS entry to address some confusion with the modification amongst some UNC parties. NK asked KA if they saw UNC 0871 being similar to [UNC 0842 - Gas Entry onto the Total system via an Independent Gas Transporter](#). KA deferred to JL, who responded that the initial discussions on UNC 0871 in the Transmission Workgroup were very high-level, and that in the next Workgroup, the level of similarity between UNC 0871 and UNC 0842 will be clearer, due to the further development of the modification and availability of the working examples as a visual tool.

CG added that when the modification was raised at UNC Panel, the Proposer had suggested that this modification was a simple change to stop gas being counted twice and was not changing the definition of 'total system', but there was a lot of disagreement from other UNC Panel members. They added that they had asked the Proposer to attend the IGT UNC Workgroup to explain the modification, adding that the Proposer did not believe there was an IGT UNC impact. The Chair confirmed that the Proposer had not reached out, but they would try to have a discussion with them.

The Chair asked NK for their thoughts on UNC 0871. NK responded that they are keeping a watching brief on the modification in the event they get involved with producing the legal text. They added that they were interested in how Gemini would deal with these modification changes, as it treats the meter readings from an IGT exit point as part of the Total System for accounting purposes. KA responded that at the early stages of this modification, the DNOs have indicated they do not believe there is any impact on Gemini, but again this will be something to be clarified later when further discussions have taken place, and the visualisation tools are available. The Chair asked KA and JL if they attend further Transmission Workgroups if they can provide updates on UNC 0871 in future Workgroups.

- **[UNC 0874 – Amendments to UNC to align with Gas Demand Forecasting Methodology.](#)** KA informed the Workgroup that this is a housekeeping modification to address out-of-date references within the UNC and suggested the main action for the IGT UNC is to determine whether the IGT UNC Code already points to the relevant sections of the UNC. They added

that this modification should remain on the Watch List whilst the changes to the UNC are drafted. The Chair agreed.

IGT UNC Equivalent Modifications

- **UNC 0864 – Update of UNC Communication Methods**. KA noted that discussions from the IGT UNC April Workgroup had indicated a separate IGT UNC modification would be needed to address its own fax references. CG added that UNC 0864 is very advanced in its development. KA asked JL if National Gas were the Proposer for UNC 0864, which JL confirmed. JL added that they had produced the ROM Response for the modification, and the solution for each reference was to either simply delete the fax reference if alternate communication methods were already listed, or to add email as an alternate method in places where only fax was referenced, apart from one reference where telephone was also added as an alternate method.

The Chair suggested that a Proposer would be needed for this modification, noting that this modification would not be needed quickly. JL added that the fax end date set by Ofcom is December 2025, meaning a solution will have to be in place by this date. CG added that they were happy to act as a Proposer for an IGT UNC equivalent modification. The Chair noted that many of the fax references will already be outdated, as some organisations will no longer have a fax number, suggesting that the modification will be needed to be raised earlier than December 2025.

7. IGT UNC Known Issues Register

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

AOB

No items of AOB were raised in the meeting and the Chair closed the meeting.

The next Workgroup meeting is scheduled for Thursday 13th June 2024.

Annex 1 – Actions Table

Reference	Action	Owner	Status
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	Closed
24/04 - 01	KA to feedback on discussions at the next UNC Transmissions Workgroup for UNC 0870	KA	Closed
24/04 - 02	KA to find out current CDSP communications regarding terminated users	KA	Closed
24/04 - 03	Code Administrator to contact REC and SEC Code Managers to determine which governance framework ASN files fall under	Code Administrator	Carried forward to 24-06 Workgroup
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	Carried forward to 24-06 Workgroup
24/05 - 01	Code Administrator to review the IGT UNC and UNC 0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers to determine whether the IGT UNC rules on terminated users require further review.	Code Administrator	Open