

IGT UNC Modification Panel Meeting

Final Minutes

Friday 28th February 2025

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Eilidh McNally	EM	Last Mile Gas	Pipeline Operators	
Ellie Osobina	EO	Ofgem	Authority	
Gareth Powell	GP	E. ON UK	Observer	
Graeme Forbes	GF	Gemserv	Observer	
Jenny Rawlinson	JR	BUUK	Pipeline Operators	
Kirsty Dudley	KD	E.ON UK	Observer	
Lee Greenwood	LG	Centrica	Pipeline Users	
Pablo Rose	PR	Ofgem	Observer	
Sam Blackaby	SB	Ofgem	Observer	
Talia Lattimore	TL	Gemserv	Code Administrator	
Rachael Jones	RJ	Gemserv	Code Administrator	Secretariat

1. Welcomes and Apologies

The Chair welcomed the Panel to the reconvened meeting. The Chair noted that following the ongoing quoracy issues the Panel faces, the Code Administrator (CA) had opened a meeting prior to this and held that open for one hour as per Code rules (Part L6.10).

There were apologies received from Harry Firth (Code Administrator). It was noted that RJ would be acting as alternate Secretariat.

2. Confirmation of Agenda

The Chair confirmed the items for discussion as outlined in the final agenda. The Panel were invited to add any items for AOB. JR added Item 13 - Cross Code Digitalisation Steering Group Update.

3. Approval of the previous minutes (24-12 and 25-01)

The CA invited comments on the 24-12 and 25-01 meeting minutes noting that no comments had been received prior to the meeting. No comments were raised during the meeting and the minutes (both standard and reconvened meetings) were approved as a true and accurate account of the meetings.

4. Outstanding Actions

The Panel were informed that there were no outstanding actions.

Panel Business

5. IGT173 – Gateway Delivery for RPC Data

KD took the Panel through a paper on observations following the implementation of IGT173 in November 2024. KD noted that a previous version of the paper had been presented at the February Workgroup as part of a previous agreement for a post-implementation review of IGT173 for one, three and six months past the implementation date. This paper had since been updated following Workgroup discussions.

KD advised that whilst the majority of IGTs and Shippers have adopted the Information Exchange (IX) mechanism to send/receive Relative Price Control Data (RPC) backing data, a number of IGTs had been observed to be issuing the files late or via email. KD added that in the February Workgroup meeting, it was confirmed that some Shippers had requested that the files continue to be sent by email. This included one large Shipper, who had also refused payment to an IGT as part of these discussions. KD noted that there is no clause within the IGT173 legal text which allows Shippers to request files to be sent via email, and that the Modification also made it clear that payment is not linked to the receipt of the RPC data. They added that even under the old email system, if the email containing RPC data was not received, the Shipper would still need to pay their invoice.

JR asked if the Workgroup had managed to discover why parties have not adopted the IX mechanism as set out in Code and whether the Workgroup made any recommendations based on this information. KD responded that from their observations, the non-compliant parties have so far chosen to not implement the IX and remain with the previous system of email. KD added that given the severity of the issue with a Shipper refusing to pay IGT invoices, this may be more of a Panel matter. JR responded that if a Shipper is not paying invoices, the IGT can place sanctions on the Shipper and the matter is beyond the IGT UNC Panel.

CH advised that the large Shipper has now paid the outstanding invoices to Indigo Pipelines after sanctions were raised but added that the Shipper is still requesting RPC data files to be issued via email, suggesting that there is no sign that this Shipper plans to adopt the IX mechanism in the near future.

KD asked the Panel if they would be comfortable naming the non-compliant parties. JR responded that they would not be comfortable, and the Chair added that the Panel meeting is not a confidential meeting and any parties named would be included within the meeting minutes. LG asked if a confidential Panel meeting could be held where the non-compliant parties could be named and discussions be held to try to implement an industry-wide solution. JR queried whether naming the

parties would help progress the issue but added that if the Panel felt this was true, they would support a confidential meeting.

KD suggested that Panel could write directly to each of the non-compliant parties, whilst doing everything possible to keep the names of the parties confidential. They added that they were struggling to think of a way to directly engage the parties, particularly the non-compliant IGT who has not engaged at all throughout the entire process. The Chair advised that the Code Administrator are capable of handling confidential matters and could pull together a letter or report without revealing names but suggested that the non-compliance matter is probably beyond the scope of the IGT UNC Panel. TL added that currently the Code Administrator are only aware of the name of one non-compliant party.

JR asked whether the use of email to send/receive RPC data had been included at all within the IGT173 legal text. KD responded that they believed the legal text permitted email only in the case of IX system failure. TL presented the IGT173 legal text to the Panel. KD added that the non-compliant IGT had claimed system failure issues when emailing the RPC data, but had not disclosed what these issues are in further detail.

The Chair suggested that the Code Administrator could issue a Request for Information (RFI) to parties to disclose any problems they have faced with the implementation of the IX as set out in IGT173. LG asked if this RFI would be mandatory to answer. The Chair responded that this, along with the overall compliance issue, are both outside of Panel's scope. KD responded that they would be happy with an RFI being issued but would prefer to also see the Code Administrator write directly to the non-compliant parties. JR responded that they would be in support of an RFI, adding that any information received from parties can be used to inform a potential solution to the non-compliance in the near future. The Chair asked if the RFI should include a question on non-payment of invoices. JR and KD responded that it should be mentioned, with a reference back to the IGT173 legal text. The Chair suggested that a more formal RFI, with a set deadline of before the March Panel meeting, would hopefully encourage parties to come forward with information.

CH and KD raised concerns that the non-compliant parties may not engage with the RFI, and KD suggested that names of non-compliant parties could be shared with the Code Administrator. They added that the Code Administrator will be able to chase these parties directly if they do not respond to the RFI. JR suggested that this could be more of a general chase-up, but potentially including reference to the Panel considering escalation at their March meeting on the remaining non-compliant parties. The Chair and JR agreed that the RFI will ask all parties to confirm they have implemented the IX as set out in IGT173, and any parties who do not respond by the set deadline will be considered as part of any escalation action taken in the March Panel meeting. EO agreed that a set deadline for the RFI would be beneficial. TL suggested that an RFI could be issued early next week, with the deadline being set for paper day for the March Panel meeting.

KD raised concerns that the RFI may not reach all of the relevant parties. TL suggested that the RFI be issued on the IGT UNC LinkedIn page as well as the email distribution list. KD agreed. LG suggested that this could also be discussed at the Xoserve IGT and Shipper Constituency meetings. TL agreed to forward on the RFI to Xoserve. JR added that they were concerned that any discussions on this matter away from IGT UNC Panel meetings could be used potentially as evidence by non-compliant parties that they have tried to engage. LG responded that they were aiming to make the parties at each Constituency meeting aware of the RFI rather than discussing it. The Chair suggested that any party wishing to discuss IGT173 further should be encouraged to attend an IGT UNC Workgroup meeting.

JR and KD queried whether the Code Administrator should state any RFI responses will be confidential, as it may impact the information collation process and also impede Panel's ability to take action on the non-compliant parties in future. The Chair agreed that there would be no mention of confidentiality. TL noted that as per the IGT UNC, any requests for confidentiality from RFI responses will have to be adhered to by the Code Administrator.

24/02 – 01: Code Administrator to issue a Request for Information to all Code parties to request information on difficulties with implementing IGT173 on behalf of the IGT UNC Panel.

6. 2026 Meeting Dates

The Chair noted that, as stated in the IGT UNC Code, Panel approval was needed for the 2026 IGT UNC meeting dates. TL presented the proposed dates, noting that for May, the proposed date was on the last Friday of the month, rather than the fourth Friday, to allow more space between the IGT UNC Panel meeting, and the IGT UNC Workgroup and UNC Panel meetings earlier in the month. The Chair also noted that in December 2026, the proposed meeting date was 18th December as the date would have fallen on a Bank Holiday.

The Panel unanimously approved the proposed 2026 meeting dates.

Update from Workgroup

7. Workgroup Summary

CH noted that [UNC 0884 – Extending the PC4 Read Submission Window](#) had been raised at the recent INA regulatory meeting, but there was no discussion.

Authority Updates

8. Authority Updates

EO provided Panel with the following updates:

- Ofgem have recently updated the Expected Determination Dates (EDDs) on their website. You may notice that some modifications for some codes have a more general EDD of 'By end of Mar 2025' instead of a specific date. This is due to an issue Ofgem have identified with the updated NESO code objectives. On 1 October 2024, upon the establishment of NESO, the Energy System Operator Licensing Direction and Licence Terms and Conditions came into effect. As a result, there were consequential changes to the Applicable Code Objectives for some of the industry codes. After reviewing this internally, Ofgem currently conclude that none of the applicable code objectives were modified for the IGT UNC. Ofgem will keep you updated if there are any more relevant considerations on this.
- As you are likely aware Ofgem have recently published their consultation on a preliminary Strategic Direction Statement (SDS*) and accompanying governance changes. This is a milestone for the code governance reform project and Ofgem look forward to hearing stakeholder views in their consultation. Responses to the consultation must be submitted by 28 March 2025. During the consultation period Ofgem will be holding workshops for stakeholders, to discuss implementation of the preliminary SDS. Invitations to register for these workshops have been shared with panel members through the panel secretariat. Ofgem would like to thank you for your ongoing engagement with the SDS, and in particular your contribution to previous stakeholder engagement sessions that have informed this draft SDS.
- As Ofgem have previously shared on 29 January 2025, the Secretary of State designated the majority of codes and certain central systems as 'qualifying' for the purposes of Schedule 12 of the Energy Act 2023. The only code not caught as part of this initial designation was the SQSS, which will follow in due course once the enabling code modifications are in place.

If you have any questions on our consultations, or on energy code governance more generally, please contact Ofgem at industrycodes@ofgem.gov.uk

9. Ofgem's Expected Decision Dates

EO confirmed there were currently no IGT UNC Modifications awaiting an Authority decision on the EDD table.

AOB

10. February 2025 Release Confirmation

TL confirmed that the February 2025 Release was adopted into Code on the morning of 28th February, with release communications also having been sent out. TL confirmed that no Modifications were included within the Release, the only inclusion was the [annual update of the CSEP NExA tables](#).

11. Ofgem Consultation on the preliminary Strategic Direction Statement and Code Governance Arrangements

EO provided an update on the ongoing Ofgem consultation as part of the Authority Update in Item 8.

12. Panel Member Term Dates

The Chair noted that the terms for all three Pipeline Operator Representatives end later this year, and the INA will need to hold elections to determine the replacements in due course. The Chair also noted that LG's term as Pipeline User Representative ends in December 2025. The Chair also clarified when each Panel Member Term Date begins and ends.

The Chair informed the Panel that there are current vacancies within the IGT UNC Panel for Representatives for Large Transporters, Suppliers and Consumers. The Chair added that these are invitational, non-voting roles.

JR asked if the Code Administrator will inform the INA of the need to hold an election for a new IGT representative. The Chair confirmed that the Code Administrator will contact the INA.

13. Cross Code Digitalisation Steering Group (CCDSG) Update

JR informed the Panel that the latest CCDSG meeting had been held on 27th February. They added that Ofgem had advised a consultation on data best practice and Code standardisation will be released in the next few months. JR advised that the CCDSG had agreed a hiatus during this period due to the Chair's focus on this upcoming consultation, with an aim to resume meetings in May 2025. JR added that the work of the CCDSG will result in obligations on the IGT UNC. TL added that this will be added to the IGT UNC Horizon Scanner for the Workgroup to view.

The next IGT UNC Panel meeting is scheduled for Friday 28th March 2025

Annex 1 – Actions Table

Reference	Action	Owner	Status
25/02 - 01	Code Administrator to issue a Request for Information to all Code parties to request information on difficulties with implementing IGT173 on behalf of the IGT UNC Panel.	Code Administrator	Open