

IGT UNC 25-06 Modification Workstream Meeting

Draft Minutes

Thursday 12th June 2025 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Aleksis Butler	AB	BUUK	
Alison Beard	ABE	Gemserv	
Ashley Foster	AF	Indigo Pipelines	
Ben Mitchell	BM	Xoserve	
Bradley Wood	BW	Centrica	
David Addison	DA	Xoserve	
Eilidh McNally	EM	Last Mile Gas	
Ellie Osobina	EO	Ofgem	
Helen Gilbert	HG	National Energy System Operator (NESO)	
Jenny Rawlinson	JR	BUUK	
Katy Binch	KB	C&C	
Nick King	NK	CNG Services	
Philip Lucas	PL	National Gas Transmission (NGT)	
Talia Lattimore	TL	Gemserv	Code Administrator
Harry Firth	HF	Gemserv	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting. There were apologies received from Cher Harris.

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. There were no additional items of AOB added.

3. Approval of the Previous Minutes 25-05

HF informed the Workgroup that comments were received for the draft 25-05 Modification Workstream meeting minutes prior to the meeting from NK regarding some minor clarifications for the item on IGT176. The Workgroup had no further 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

TL informed the Workgroup that there was one outstanding action:

25/05 – 01: Xoserve to inform Centrica of the current process for updating MPRNs when being transferred from a DNO to an IGT. The Chair provided some background information to the Workgroup, explaining that Lee Greenwood (Centrica) had raised an issue connected to IGTs purchasing Supply Points from DNOs and the various processes involved, including updating MPRNs. BM confirmed that Xoserve had looked into this process and had forwarded relevant information onto the Code Administrator and Centrica. They added that Xoserve would be notified of this purchase via the [Site Transfer Notification \(STN\) process](#). BM added that from Xoserve's perspective, the MPRNs would be transferred across and would not change. However, they added that Xoserve received feedback that some IGTs are unable to use DNO MPRNs, so there is a workaround process in place to deal with this issue under the STN process, where the Shipper would withdraw from the existing MPRN, and the IGT would create a new MPRN in its place. BM added that Xoserve were interested to know whether this workaround process would be required for all IGTs purchasing Supply Points from DNOs. The Chair agreed to set an action on IGTs for this. **Action closed.**

25/06 – 01: IGTs to consider whether their organisation requires new MPRNs to be created when transferring Supply Points from DNOs to their own portfolio and feedback to Xoserve

KB advised that they have been in direct contact with Xoserve to try and understand this process as they are currently dealing with a DNO to IGT transfer. KB added that there are currently two options, either the DNO MPRN is transferred into the IGT portfolio, or the Shipper has to withdraw from the current MPRN, that MPRN is made extinct, a new MPRN is created by the IGT which the Shipper then registers itself against. They added that it was important that all parties are kept informed of the process in the event of a DNO to IGT transfer, noting the potential consumer impact previously raised by Centrica.

KB advised that although previously C&C IGT systems could not accept MPRNs below 10 digits, they had made system changes to ensure this was now possible, and the STN process is available to them. KB added they had reached out to the IGT UNC Code Administrator, the Joint Office and the REC Code Manager to ensure there were not any unforeseen Code implications. They added that Xoserve had raised a concern that Shippers have got validation rules within their own systems, including matching MPRN length against the type of party, which may cause issues. They added that they were keen for a further discussion on this topic, to understand the potential system impacts.

The Chair suggested that this item is put on the agenda for the July Workgroup meeting and asked attendees to invite those within their organisations with the relevant experience to help discussions. They added that there is a license condition on Suppliers to inform their Consumers if there is a change in DNO, so full communication and clarity on this process is important for all parties. TL added that the Code Administrator will specify this request in any communication to IGT UNC parties regarding the July Workgroup meeting.

25/05 – 02: IGT UNC parties to bring relevant experience to the July Workgroup to facilitate discussion on the current processes for updating MPRNs when being transferred from a DNO to an IGT

MODIFICATIONS

5. [IGT176 - Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#)

TL provided an overview of the Modification. TL explained that IGT176 is an enabling Modification for [UNC 0887 - Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS](#). They added that NK had provided an introduction of the Modification and gone through a version of the proposed legal text with the Workgroup at the May meeting.

AB asked what obligations would be placed on an IGT if they wanted to connect to the National Transmission System (NTS). NK responded that there is an obligation on National Gas Transmission (NGT) to provide connections to NTS. They added that UNC 0887 has addressed the process of UNC parties connecting to the NTS and IGT176 will attempt to do the same for IGT UNC parties so that the established process of connecting to the NTS can apply.

The Chair asked about the differences between the requirements for Gas Distribution Networks (GDNs) and IGTs when connecting to the NTS. PL responded that the current provisions for an IGT to connect to a Large Transporter network are held in the Independent Gas Transporters Arrangements Document (IGTAD). PL added that UNC 0887 and IGT176 are aiming to supplement those provisions with some additional requirements to allow for IGTs to connect to NTS. The Chair added that a key difference is there is a metered connection between a Large Transporter and NTS, but an unmetered connection proposed between an IGT and the NTS. PL confirmed this was the case.

PL asked about the proposed timeline for IGT176. TL responded that the current plan is to complete the Workgroup Report in the July meeting.

TL took the Workgroup through an updated version of the IGT176 legal text, with the updates since the last Workgroup clearly highlighted. NK provided an explanation for each of the new updates. They advised that the provisions of TPD Section G Paragraph 6 regarding non-CSS Supply Points will apply and that the UNC text had been closely replicated in the IGT UNC. DA asked about the reference to TPD Section G6, as there were parts of this section that relate to NTS offtake arrangements. NK responded that they had carved out parts of Section G6 which are not relevant to the IGT UNC. They added that this included the parts on Shared Supply Meter Points. DA responded that this carve out would avoid additional complications for many IGT processes. PL added that there is already a limitation in the IGT UNC restricting each Supply Point to one Pipeline User and suggested that if someone wants this added in that they do so under a separate Modification. DA agreed with this view.

AB advised that a reference to TPD Section G, paragraph 4.2.3 (b) (i) is incorrect in the legal text, as there is no part (i). NK thanked AB and advised that this would be amended.

DA noted the proposed Part R, Paragraph 1.2, and asked NK if Relevant User was the term used by the IGT UNC in place of Registered User. They added that Registered User and Relevant User are different defined terms in the UNC and asked why Registered User isn't used. NK responded that this legal text is a lift from the relevant section of TPD, which uses the same wording for the same process.

DA asked if there is a possibility with anything detailed in Part R, that could cause a problem with using Relevant User as a direct replacement of Registered User, such as a Network Exit Agreement (NExA) being agreed with a Shipper not being able to be agreed before they are registered. NK went through TPD.

DA raised concerns that Relevant User may not be able to be used instead of Registered User within the IGT UNC, and that there might be processes in the proposed Part R (IGT UNC) that would not require a Shipper to be the Registered User beforehand. TL shared TPD Section J with the Workgroup. NK went through Section J, paragraph 1.2.4, which states (a) Relevant User means Registered User in relation to a Supply Meter Point or Supply Point in Section J. NK added that they had omitted the bit relating to a Supply Point or Supply Meter Point as the proposed IGT UNC Part R only applies to Supply Points. DA and PL agreed that the usage of Relevant User is fine as NK has limited the application.

NK advised that the calculation for the maximum permitted rate for exit capacity on an IGT-NTS connection had been included in the legal text, lifted from TPD Section J, 3.10.2 (b). The Chair asked if this is an obligation on the Shipper. PL clarified that under UNC 0887, the Registered Pipeline User will be incentivised to book exit capacity, and this booked figure is divided by 24 to set the actual maximum rate per hour. The Chair responded that the IGT needs to have an agreement with the NTS on the maximum capacity it can take and then manage all of the individual Supply Points on their network to ensure that capacity is not breached.

NK referred to TPD Section J, 3.10.5 and advised that the IGT is not obliged to make gas available for offtake from an NTS Supply Meter Point by a Pipeline User when the maximum capacity has been breached. The Chair responded that the IGT and Shipper need to be able to understand this limit and if it is being approached. NK responded that the Shipper has to be aware of the Network Exit Agreement in place and ensure they comply with them to ensure maximum capacity is not breached. The Chair responded that the Shipper will not be aware if the maximum capacity is potentially going to be breached, and there is a responsibility for IGTs to monitor and make the Shipper aware. PL responded that the Registered User will know the figures as they are responsible for capacity and book this via Gemini. The Chair responded that the maximum capacity must be calculable by IGT UNC parties, to avoid any breaches. PL clarified that TPD Section J, 3.10.2 refers to a singular Pipeline User at a singular Supply Point, not the notional connection point. PL and NK discussed the current obligations of IGTs making gas available for offtake and how that obligation is impacted by the

proposed paragraph 3.10.2 in the new Part R. The Chair suggested that PL and NK should discuss this further offline and bring back a refined solution if one is thought to be necessary to the next Workgroup meeting.

25/06 – 03: NK to reconsider capacity obligations on parties and amend legal text ahead of the July Workgroup if required.

TL advised that the revised legal text will be made available ahead of the July Workgroup meeting. They added that they had begun drafting the IGT176 Workgroup Report. The Chair advised that the aim would be to complete the Workgroup Report in the next meeting.

6. IGT177 - Aligning IGT “must read” obligations within the IGT UNC

AB introduced the Modification to the Workgroup. AB advised that IGT177 is aiming to maintain the existing Must Read obligations on IGTs, by removing reference to UNC TPD Section M 5.10 from IGT UNC Part E and aligning the relevant legal text within the IGT UNC to ensure that these obligations “stand alone” in the IGT UNC. JR added that the Modification is ensuring the Code reflects the current obligations and is not subject to any unintended consequences resulting from [UNC 0908 - Removal of DNO meter reading obligations resulting from non-provision of a Valid Meter Reading](#).

TL advised that the Proposer’s intention was for the Workgroup Report to be completed by the Workgroup in this meeting, with the Workgroup Report being considered by the Panel in June. It would then be expected that the Draft Modification Report would be issued for consultation shortly after the June Panel meeting and the Modification going back to Panel for decision in July.

Governance

AB advised that they believed IGT177 meets the requirements for a Self-Governance Modification as there is no change of process nor additional governance on any IGT UNC parties. The Workgroup agreed with this and that the Modification should be considered Self-Governance.

Impacts and Other Considerations

TL noted that the Proposer had stated no impacts on a Significant Code Review for this Modification. The Workgroup agreed with this view.

AB advised that although there would be no foreseen Consumer impacts, IGT177 is looking to safeguard the current Must Read process for IGTs, which provides positive Consumer impacts through incentivising regular meter readings and therefore more accurate Consumer bills and improved quality of service. JR added that potentially an unintended consequence of UNC 0908 would be the removal of these Consumer benefits and IGT177 is purely a safeguarding Modification against such consequences.

DA raised a concern about potential costs. JR responded that they would have assumed any operational costs would be minimal as it is regarding an active service, but there may be an increase in running costs if the DNOs opt out. DA responded that these Modifications may lead to discussions

at Change Management and Contract Management committees about reallocation across the service lines. JR agreed but stressed that these concerns regarding increased costs stem from UNC 0908 rather than IGT177. They added that it was important to note that there will be no additional IGT costs because of IGT177 and these discussions under UNC 0908 would take place regardless of this Modification. The Chair suggested that these discussions should be recorded as a cross-code impact for UNC 0908. JR agreed.

The Chair noted the discussions centred around UNC 0908 and suggested that some background should be provided for this Modification. JR advised that DNOs are looking to remove the obligation on GDNs to take a meter reading when the Supplier has failed to do so. The Chair asked if the Must Read definition will remain in Code or is it just the obligation on DNO's that will be removed. JR responded that it is just the obligation that is proposed to be removed. JR added that they believed Must Read was not defined in the UNC or IGT UNC and DA and TL added that it was their understanding as well.

TL asked the Workgroup for any comments on the identified Consumer benefits of IGT177. DA suggested that as this Modification is purely lifting Code from the UNC to maintain the status quo for IGT Must Read obligations, they suggested that all of the identified Consumer impacts should be neutral. BW agreed. JR responded that they agreed with the purpose of the Modification, but as IGT177 was protecting current Consumer benefits that would be otherwise lost, these benefits can be considered under IGT177. AB agreed. The Workgroup agreed on a neutral Consumer impact as the Workgroup view but acknowledged the protection of current Consumer benefits resulting from IGT177 and that the Proposer saw this as a positive impact.

DA raised concerns over some of the proposed positive benefits of IGT177 and suggested that UNC 0908 may prove to introduce a more efficient way of handling meter readings. The Chair responded that the positive benefits of IGT177 should be considered as the current process is already part of Code on its own merits. JR added that UNC 0908 could prove to have a positive impact on the industry and make the Must Read process redundant but noted that there is a long way to go to progress that Modification and noted the opposition from some Shippers and the Performance Assurance Framework Administrator (PAFA).

HG asked if there was precedent for this type of Modification where the legal text has been lifted from another Code, and how the impacts were reflected. TL responded that they were unaware of a similar Modification but noted that it is not uncommon for the views of the Proposer and Workgroup to differ on the Modification impacts.

The Chair suggested that given the discussions around UNC 0908, a cross-code impact on the IGT UNC should be noted for that Modification, and that the IGT UNC will need to take action if UNC 0908 is implemented without or before the implementation of IGT177. They added that even with IGT177 being implemented, UNC 0908 will have a potential impact on IGT costs. TL added that they will raise these concerns with the Joint Office through existing routes, noting Cross Code Steering Group

(CCSG) and direct engagement. JR noted that UNC 0908 already reflects an impact on the IGT UNC. TL responded that they had raised it with the Joint Office when the Modification was first raised.

TL noted that the Proposer had not identified any environmental impacts. The Workgroup agreed.

Relevant Objectives

TL advised that the Proposer had identified a positive impact on Relevant Objective (F) – Promotion of efficiency in the implementation and administration of the Code. DA supported this, adding that the IGTs are deciding to keep a section of Code within the IGT UNC to maintain efficiency. They added that IGT177 is only adding to the efficiency of the IGT UNC Code in the event that UNC 0908 is implemented. HG agreed that IGT177 has a positive impact on (F).

TL noted that the Proposer had identified neutral benefits for the other Relevant Objectives. The Workgroup agreed that this Modification would have a positive impact on Objective (F).

Legal Text

DA asked if the proposed changes to the IGT UNC are a simple lift from UNC TPD Section M, where the current Must Read obligations are located and which the IGT UNC currently directly references. AB confirmed that this was the case, although some of the language in the relevant paragraphs had been amended to align with the rest of the IGT UNC. DA asked if there are any proposed changes to the current process, and if so, what would the potential impact be on Xoserve. JR responded that UNC 0908 will have the greater impact on Xoserve, and IGT177 is maintaining the current processes and services for IGT networks. DA responded that there could be a change of consequences resulting from UNC 0908 being implemented, including potential discussions in DSC Change Management over funding splits, as Xoserve maintain services for obligations placed only on IGTs. JR agreed that it was important to highlight any CDSP impacts resulting from UNC 0908, but these primarily should be looked at when discussing the UNC Modification. They added that IGT177 would not have been raised without UNC 0908 and that the governance under the IGT UNC will remain the same because of IGT177.

TL asked the Workgroup if they were happy that the legal text delivered the intent of the Modification. The Workgroup agreed that it does.

Implementation

TL noted that the Proposer had requested for this Modification to be implemented as soon as possible and asked for further clarification, noting that it is too late to include IGT177 in the standard release planned for June 2025. JR responded that they would support IGT177 being implemented in the next standard release in November 2025. They asked about the timeline for UNC 0908. TL responded that the Workgroup Report is aimed for completion in September. The Chair suggested that there should be a recommendation that UNC 0908 is not implemented before IGT177, noting that UNC 0908 is a self-governance Modification and usually UNC Modifications are implemented immediately after approval. They asked DA about any potential system impacts resulting from UNC 0908 which could

require some lead time. DA responded that it is too early to fully determine any required system changes because of UNC 0908. They suggested that a sensible approach would be to plan for IGT177 to be implemented in November but could be released earlier to align with UNC 0908. JR agreed and asked how plausible an immediate release would be for the Code Administrator. TL responded that as IGT177 is subject to self-governance, it could be implemented as soon as the standard 15 day appeal window has passed. They added that given the simplicity of the legal text, an ad hoc release could be possible. The Workgroup agreed with the approach that the implementation of IGT177 will depend on the implementation of UNC 0908, and that IGT177 should be released before or alongside UNC 0908.

Recommendation:

The Workgroup unanimously agreed that:

- This Self-Governance Modification should proceed to consultation.

STANDING ITEMS

7. Cross Code Modification Implications Tracker

HF provided the Workgroup with the following updates on in flight UNC modifications:

Watch List

- [**0896 - Reducing the current Code Cut-Off Date \(Line in the Sand\) from 3 to 4 years to 2 to 3 years.**](#) The Modification was extended by two months at the UNC May Panel meeting and will return in July. The IGT UNC Code Administrator have found a reference to the amended term in IGT UNC Section E, 21, which directly references TPD Section M, 5.16 so there will be automatic application within the IGT UNC.
- [**0886 – Amend the Code Cut-off Date to a Rolling Three-Year Period.**](#) The Modification was extended by two months at the UNC May Panel meeting and will return in July. The IGT UNC Code Administrator has found a reference to the amended term in IGT UNC Section E, 21, which directly references TPD Section M, 5.16 so there will be automatic application within the IGT UNC.

IGT UNC Equivalent Modifications

- [**0899 - To ensure the suite of Network Exit Agreements \(NExA\) Modifications has been implemented, taking into account the changes introduced by 0804.**](#) An IGT UNC equivalent Modification, [**IGT175 - Alignment of the IGT UNC with the UNC following Modification UNC0899 and additional housekeeping changes,**](#) was approved for implementation at the IGT UNC Panel meeting in May, and will be implemented as part of a standard release on 27th June 2025.
- [**0887 – Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS:**](#) The Final Modification Report is due to be presented to the UNC Panel this month.

- [0884 – Extending the PC4 Submission Window](#): This Modification is due to report to UNC Panel this month. TL confirmed there is currently no sponsor for a potential equivalent Modification in the IGT UNC.
- [0881 - Review and consolidation of UNC Transition Document TDIIC - Transitional Rules](#). It was confirmed that the required housekeeping change to the IGT UNC from UNC 0881 had been included within IGT175, which is due to be implemented later this month.
- [0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#): The Code Administrator are still waiting for the proposed Sponsor to raise the equivalent Modification to UNC 0854.
- [0843 - Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert](#). This Modification is currently out for consultation and will return to UNC Panel in August. HF and TL advised that at the May IGT UNC Panel meeting, the Panel had decided to align the end date of the IGT165 consultation with UNC 0843, and it should run for a standard three week period. It was noted during the Panel meeting that the UNC 0843 consultation was open until 18th July, but afterwards the Code Administrator realised that it was closing on 11th July instead. Following consultation with the Panel, the Code Administrator confirmed that the IGT165 consultation will be open to responses for three weeks, closing on 11th July.

Live Review Groups:

- [0879 – Review of current Supply Meter Point Classes \(Classes 1-4\)](#): Work on this review resumed in May, the workgroup considered classes 2 and 3 and began work on class 4. The workgroup also discussed the butterfly effect and cascading dependencies, assumptions and review scope.

8. IGT UNC Known Issues Register

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

9. IGT UNC Horizon Scanner

TL presented some changes to the Horizon Scanner and provided the Workgroup with the following updates:

Ofgem Code Reform Consultation:

TL advised that the [joint consultation issued by DESNZ and Ofgem on Code manager licence conditions and code modification appeals to the CMA](#) is open to responses until 27th June.

AOB

10. IGT ONUPD Files

BW asked for this item to be deferred to the next Workgroup meeting. The Chair agreed.

11. June 2025 IGT UNC Release Update

TL advised that the IGT UNC Panel approved IGT175 for implementation at the May meeting and added that subject to the standard 15 day appeal window, this Modification will be included in the planned standard release on 27th June. TL added that they would send out communications in the week commencing 23rd June to confirm this to IGT UNC parties.

The next Workgroup meeting is scheduled for Thursday 10th July 2025.

DRAFT

Annex 1 – Actions Table

Reference	Action	Owner	Status
25/05 - 01	Xoserve to inform Centrica of the current process for updating MPRNs when being transferred from a DNO to an IGT.	Xoserve	Closed
25/06 - 01	IGTs to consider whether their organisation requires new MPRNs to be created when transferring Supply Points from DNOs to their own portfolio and feedback to Xoserve	IGTs	Open
25/06 - 02	IGT UNC parties to bring relevant experience to the July Workgroup to facilitate discussion on the current processes for updating MPRNs when being transferred from a DNO to an IGT	IGT UNC Parties	Open
25/06 - 03	NK to reconsider capacity obligations on parties and amend legal text ahead of the July Workgroup if required.	NK	Open