

IGT UNC Modification Panel Meeting

Final Minutes

Friday 28th March 2025

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Alice Johnston	AJO	Ofgem	Observer	
Charlotte Gilbert	CG	BUUK	Observer	Proposer for IGT175
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Eilidh McNally	EM	Last Mile Gas	Pipeline Operators	
Ellie Osobina	EO	Ofgem	Authority	
Graeme Forbes	GF	Gemserv	Observer	
Kirsty Dudley	KD	E.ON UK	Observer	Proposer for IGT173
Lee Greenwood	LG	Centrica	Pipeline Users	
Lydia Bentley	LB	Gemserv	Code Administrator	
Nick King	NK	CNG Services	Observer	Proposer for IGT176
Paul Witton-Dauris	PWD	Gemserv	Code Administrator	
Talia Lattimore	TL	Gemserv	Code Administrator	
Harry Firth	HF	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 Jenny Rawlinson (BUUK). It was noted that CH would be acting as alternate.

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. GF added Item 10 – Code Reform Transition.

3. Approval of the previous minutes (25-02)

The CA invited comments on the 25-02 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 meeting.

4. Outstanding Actions

The Panel were informed that there was one outstanding action:

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.

TL confirmed that the Code Administrator had issued a Request for Information (RFI) to all Code parties on behalf of the IGT UNC Panel on 6th March 2025 regarding the implementation of IGT173, with the deadline for responses set for 19th March 2025. The Chair suggested that the Panel review the responses to the RFI as part of Item 5. The Panel agreed. Action closed.

Panel Business

5. IGT173 – Gateway Delivery for RPC Data

TL took the Panel through the responses to the IGT173 RFI issued following the February IGT UNC Panel meeting. TL advised that the published paper of responses had been kept confidential in line with the views of the Panel at the last meeting, with each response only identified as either an IGT or Shipper, and any identifying information in responses removed.

CH asked if most parties who responded to the RFI are the usual parties who are engaged in Code matters. TL confirmed that this was the case.

TL noted in particular the responses to Question 2b (“Please indicate which organisation(s) have not adopted the solution and the impacts that this has had on your organisation”) and thanked the responders for the comprehensive detail on the problems faced since the implementation of IGT173.

CH asked for clarification on a “partially received” RPC file. TL provided examples, such as some of the files being sent via the IX, with the rest being sent via email. They also noted some other problems such as incorrect files, incorrect invoice numbers and MSN fields containing an incorrect digit length.

TL noted a response from an IGT who indicated that several small Shippers were unaware of IGT173 and thus were not ready for the initial billing run in December 2024, although these Shippers later implemented the solution. TL added that this raises a concern that information on this Modification did not spread far enough, noting the limited number of Shippers on the IGT UNC distribution list. CH added that it is concerning that this incident has not caused more parties to engage with the IGT UNC. TL added that it was surprising that some Shippers were not aware given the solution involved a system change released by Xoserve. They continued advising that Xoserve’s communications during the development of system changes and ahead of Major Releases is far reaching. LG agreed, adding that XRN 5720, the relevant system change, went out as part of the November 2024 Major Release and would have been publicised by Xoserve through the usual channels and so all Code parties should have been aware. CH agreed.

LG raised concerns that no action over the Code parties who have not implemented the IGT173 solution and are refusing to do so, would set a poor precedent for future Modifications. The Chair

agreed, and added that there had been parties who had attempted to hold payments in a bid to reverse the Modification as they wished to receive the RPC data via email.

The Chair suggested that the Panel may need to consider an ultimate solution regarding non-compliance for IGT173 and future Modifications. They suggested that a Modification on compliance could be an option and TL added further that should work be needed to determine the right approach, a Review could also be raised. LG asked if any similar compliance issues had ever been raised in the IGT UNC before. The Chair responded that there have not been any.

The Chair noted that some previous matters relating to compliance in the UNC and IGT UNC have occasionally been referred to the Performance Assurance Committee (PAC). They added that PAC's focus is on settlement accuracy, as is their remit in accordance with Section V of the UNC, but potentially, their powers could be extended to Code compliance. The Chair added that the UNC also do not have compliance mechanisms within their Code and suggested that the Joint Office could have experienced similar issues. LG queried whether forwarding this issue to PAC would result in another RFI which is ignored by most parties. The Chair responded that any RFI issued by PAC forces all Code parties to respond, although the RFI could be reasonably challenged as Code compliance is out of PAC's remit.

CH suggested that these issues on compliance should be flagged to Ofgem regarding the ongoing Code Reform programme. The Chair agreed, noting the current gap in both the UNC and IGT UNC. They added that major issues in compliance would usually be dealt with via Ofgem and suggested that this should still be the case, but for smaller compliance issues, there should be provisions within Codes to deal with these matters.

EM and LG asked about existing options to deal with the Code parties who are still non-compliant with the IGT173 solution. The Chair responded that if there is a serious breach of Code, there are options such as stopping a Shipper from trading. EM asked if this could be used as a threat to Codes, that the Code Administrator could put out a notice to all Code parties on behalf of the Panel stating that if the IGT173 solution is not implemented within a certain time period, then the IGT UNC Panel would consider this as a serious breach of Code. The Chair agreed that this could be done, and the non-complaint parties could be passed onto Ofgem, as it is a License requirement to adhere to the Code. CH added that when they placed sanctions on a large Shipper for not implementing the IGT173 solution and subsequently withholding payments, this was effective, but this is not an option for non-compliant IGTs, so threatening to pass them over to Ofgem could be an alternative solution.

The Chair asked the Panel members how they would like to proceed with this issue. LG responded that they would like the opportunity to take this issue and the potential options discussed away and speak internally before making a decision. They added that both the current issue and any resolution will likely to be complicated.

TL suggested that the Code Administrator could reach out to the parties who responded to the RFI and named non-compliant organisations to determine whether any progress has been made in these organisations implementing the IGT173 solution.

KD suggested that the IGT UNC Panel could ask Xoserve to produce an independent report on which Code parties are currently sending and receiving RPC files via the IX as they should have access to this information. They added that this report would help to identify the non-compliant parties and if any parties are experiencing any issues with the IX. KD added that Xoserve producing this report may also provide time to the Panel members considering their options regarding non-compliance. The Chair asked if Xoserve will be able to tell if Shippers are using the IX as they are only receiving files, noting that there would be evidence of delivery receipts for compliant IGTs. KD responded that they believed delivery receipts would only be made available if the Shipper had configured the IX and thus the files have been successfully delivered, so that could be a possible way to detect non-compliant Shippers. They added that they would need to hold conversations with Xoserve to confirm if this report would be feasible, along with any potential costs, and would be happy to lead on this as the Proposer for IGT173.

The Chair asked for suggestions on when this report should be produced, adding that if a warning should be sent out to all Parties. KD responded that they believed it would be unlikely for Xoserve to start on this report until after the May billing run is finished, which would provide some time for any non-compliant parties to implement the IGT173 solution prior to the report. TL noted that should Xoserve be able to pull the report, they may be reluctant to provide any company names so determining scale may be an issue if the report is too high level. KD responded that it could be pitched to Xoserve as a factual report, noting purely which parties successfully sent and received the RPC data via the IX. They added that anonymity could also be requested in the Xoserve report.

The Chair asked the Panel how they wished to proceed with this idea. LG responded that they thought it was a good idea. The Chair suggested that the report be requested by the IGT UNC Panel rather than the Proposer. The Panel agreed.

25/03 – 01: The Code Administrator (TL) to request a report from Xoserve on behalf of the IGT UNC Panel showing the scale of IGTs and Shippers that have fully implemented the solution for IGT173

EM asked if a notice should be sent out to Code parties before the report commences threatening potential action in the event of further non-compliance. LG responded that they think this notice should wait until after the report so that the Panel have a fact-based view of the current situation and also give the Panel more time to review all possible options. They also raised concerns that failure to implement the IGT173 solution could be a training issue. The Chair suggested that the Code Administrator could issue a notice on behalf of the IGT UNC Panel that the Panel are looking into the matter and will be seeking a report from Xoserve to identify the non-compliant parties, and any parties who have not implemented the IGT173 solution should reach out to Xoserve or the Code Administrator. The Panel agreed that this would be a good approach.

25/03 – 02: The Code Administrator to issue a notice to all Code Parties on behalf of the IGT UNC Panel on IGT173 non-compliance and the requested independent report from Xoserve.

The Chair advised that this item will remain on the agenda for the April Panel meeting, so that an update on the Xoserve report can be provided to Panel members and Panel Members can have time to think about some of the options discussed in this meeting.

6. IGT175 - Alignment of the IGT UNC with the UNC following Modification UNC0899 and additional housekeeping changes

CG as Proposer presented an overview of this new Modification to the IGT UNC Panel. CG informed the Panel that [UNC0899 - To ensure the suite of Network Exit Agreements \(NExA\) Modifications has been implemented, taking into account the changes introduced by 0804](#) had been raised to correct some outstanding housekeeping changes that had been identified in the UNC following the implementation of [UNC0701 - Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs](#) and [UNC0853 - CDSP permissions to facilitate implementation of UNC0701](#). CG added that the legal text, that had been misaligned in the UNC following the implementation of these Modifications, had been mirrored in the IGT UNC following the implementation of [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 \(i.e. bringing Code in line with UNC0701 and UNC0853\)](#) so a housekeeping Modification was also required to realign the IGT UNC. CG added that other outstanding housekeeping changes that had been noted on the IGT UNC Known Issues Register had also been included within IGT175.

CG noted that there had been a concern previously raised by Xoserve that one of the proposed changes in UNC0899 may be changing the meaning of the clause and may not constitute a housekeeping change. They added that Xoserve have now confirmed that they are happy with the proposed change and that the meaning of the clause has not been altered in the legal drafting for UNC0899.

Timetable

CG advised that they intended for the Workgroup Report to be completed at the next Workgroup meeting, before returning to the IGT UNC Panel in April. TL added that IGT175 would be sent out for a standard three-week consultation, closing for responses on 20th May. TL advised that the pre-Panel Final Modification Report (FMR) would be published on 21st May and would constitute a late paper for the May IGT UNC Panel meeting on 23rd May. The Chair asked the Panel if they were happy with receiving the FMR as a late paper for the May IGT UNC Panel meeting. The Panel unanimously agreed.

Governance

CG advised that as IGT175 is a housekeeping Modification, it should be subject to Self-Governance. The Panel unanimously agreed.

Significant Code Review

CG advised that they believed IGT175 would have no impact on a Significant Code Review or any other significant industry change projects. The Panel unanimously agreed.

Recommendations:

The Panel unanimously agreed that:

- Self-Governance procedures should apply ;and
- This proposal should be referred to the IGT UNC Workgroup for assessment.

7. IGT176 - Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'

NK as Proposer presented an overview of this new Modification to the IGT UNC Panel. NK informed that this Modification is required to enable [UNC0887](#). NK added that this will be achieved by including the UNC0887 Proposer, National Gas Transmission (NGT) as a Large Transporter and to apply the core IGT concept of “deeming flow” to and from the National Balancing Point (NBP), whilst replicating as closely as practicable the existing NTS “direct connect” exit and entry arrangements that UNC Shippers use. NK focused on the requirement to introduce the concept of non-CSS Supply Meter Points into the IGT UNC, as it is an NTS requirement that for an IGT to connect, they must be classified as non-CSS Supply Meter Points. The Chair asked if this was a requirement within UNC0887 and thus needed to be mirrored in the IGT UNC. NK confirmed this.

The Chair asked if UNC0887 introducing NGT as a party to the Independent Gas Transporter Arrangement Document (IGTAD) will automatically make IGTAD apply in the context of the NTS as well as DNOs (Distribution Network Operators), or if specific requirements will be required in the IGT UNC. NK responded that a large section of the updated IGTAD will apply to both Distribution and Transmission equally, but there will be some new sections included that will only apply to Transmission, and some existing sections clarified to show they do not apply to Transmission.

The Chair asked why NK had put a low impact on Shippers for this Modification and suggested that this would be a significant change. NK responded that the intent of the Modification is that Shippers will be able to continue their usual processes when connecting to the NTS directly. The Chair suggested that some of the Shippers that currently connect to the NTS may not have any arrangements with IGTs. The Chair added that it was important to make these Shippers aware of this Modification and suggested that it be made known in the UNC0887 Workgroup to give awareness. TL responded that the UNC0887 Workgroup has just held its final meeting but that the Code Administrator could ask the Joint Office to send out a notice on their behalf. LG added that there is a Shipper Constituency meeting on 23rd April where awareness of the Modification could be raised.

Timetable

TL advised that IGT176 would go to the April Workgroup meeting for initial consideration. They added that UNC0887 is at an advanced stage and sets out the framework for the Independent Shrinkage Expert. IGT176 will look at what is needed in the IGT UNC to enable the framework to work and so the initial plan is for this Modification is for it to be discussed at three Workgroup meetings, with the Workgroup Report being completed in June, and a consultation issued in July. The Chair asked the Panel if they were happy with this approach, noting that this could likely be subject to change at a later date. The Panel unanimously agreed that they were happy with this approach.

Governance

The Chair noted that the Proposer had suggested that IGT176 should be subject to an Authority decision given that it is a marry to UNC0887, which is also subject to an Authority decision. The Panel unanimously agreed.

EO advised that Ofgem's preference would be to decide on both UNC0887 and IGT176 simultaneously as they believe that UNC0887 cannot be fully implemented without the facilitating IGT UNC Modification. The Chair asked that given the advanced stage of UNC0887, it will be sent to Ofgem earlier but will not be considered until IGT176 has also been sent to Ofgem. EO confirmed this. TL added that the Joint Office and UNC0887 Workgroup had noted a dependency of UNC0887 on IGT176 and were therefore aware.

Significant Code Review

NK advised that they believed IGT175 would have no impact on a Significant Code Review or other significant industry change projects. The Panel unanimously agreed.

Recommendations

The Panel unanimously agreed that:

- The Modification should be subject to an Authority decision ;and
- This proposal should be referred to the IGT UNC Workgroup for assessment.

Authority Updates

8. Authority Updates

EO provided Panel with the following updates:

- On 10 March, Ofgem published their decision to carry out the selection of the code managers for the REC and the BSC on a non-competitive basis. Ofgem have invited the RECCo and Elexon to submit a licensing assessment form, following the process that Ofgem consulted on in November last year. Ofgem will be publishing a Decision document in response to that consultation in due course.

- As a reminder, Ofgem's consultation on a preliminary SDS and accompanying governance changes is open for responses. 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 Friday 28 March 2025.

If you have any questions on Ofgem's consultations, or on energy code governance more generally, please contact 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. **Code Reform Transition**

GF advised that given the ongoing Code Reform programme, the Code Administrator would like the Panel to give more consideration to the transition process for the Code Consolidation of the IGT UNC and UNC into a unified Gas Network Code (GNC). GF added that they hoped to bring some firmer proposals to a future Panel meeting but suggested that Panel members expect to undertake more work on this transition process and ensuring that the IGT UNC parties have their interests properly considered within the GNC and up to the point of Code Consolidation. They added that they hoped to introduce a transitional plan with certain milestones for the Panel to work on in preparation for the GNC. The Chair added that one matter that needs to be considered is whether the Panel believe their current remit is sufficient, noting that their current focus is on Modifications and Derogation processes, and queried if this will be fit for purpose moving into this transitional period. GF advised that they were happy to discuss this individually with individual Panel members if they had any questions.

The next IGT UNC Panel meeting is scheduled for Friday 25th April 2025

Annex 1 – Actions Table

Reference	Action	Owner	Status
25/02 - 01	<i>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.</i>	Code Administrator	Closed
25/03 - 01	The Code Administrator (TL) to request a report from Xoserve on behalf of the IGT UNC Panel showing the scale of IGTs and Shippers that have fully implemented the solution for IGT173.	Code Administrator (TL)	Open
25/03 - 02	The Code Administrator to issue a notice to all Code Parties on behalf of the IGT UNC Panel on IGT173 non-compliance and the requested independent report from Xoserve.	Code Administrator	Open