

IGT UNC 25-04 Modification Workstream Meeting

Final Minutes

Thursday 10th April 2025 via Teleconference

Attendee	Initial	Organisation	Notes
Rachel Clarke	RC	Gemserv	Chair
Aleksis Butler	AB	BUUK	
Charlotte Gilbert	CG	BUUK	
Cher Harris	CH	Indigo Pipelines	
David Morley	DM	Ovo	
Eilidh McNally	EM	Last Mile Gas	
Ellie Osobina	EO	Ofgem	
Harry Davis	HD	CNG Services	
Josie Lewis	JL	Xoserve	
Jenny Rawlinson	JR	BUUK	
Lee Greenwood	LG	Centrica	
Lydia Bentley	LB	Gemserv	Code Administrator
Michelle Niits	MN	National Energy System Operator	
Nick King	NK	CNG Services	
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 Anne Jackson (AJ). It was noted that RC would act as alternate Chair.

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.

3. Approval of the Previous Minutes_25-03

HF informed the Workgroup that comments were received for the draft 25-03 Modification Workstream meeting minutes prior to the meeting from Xoserve to clarify the minimum lead time required for IGT165. 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 were no outstanding actions.

MODIFICATIONS**5. IGT165 – Independent Shrinkage Expert and Independent Shrinkage Charge**

TL presented an overview of the Modification to the Workgroup. TL added that the latest Workgroup for [UNC 0843 - Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert](#) had been held on 9th April. They added that the Workgroup Report had not been completed, and the intention is for UNC 0843 to be sent back to UNC Panel in May. CG added that an extension had been requested for UNC 0843 so that it would return in June. TL added that the intention for the IGT UNC Workgroup is to finish the IGT165 Workgroup Report in this meeting but noted that there would now be time to finalise the Workgroup Report at the May IGT UNC Workgroup meeting if required. TL advised that there were changes to references required in the IGT165 legal text as a result of the updated UNC 0843 legal text.

DM raised a point made by CG at the UNC 0843 Workgroup that there is an error in the Modification that indicates Shippers are responsible for the Modification costs and suggested that this be highlighted in the Workgroup report. TL responded that the Modification costs sit outside of IGT165 and reminded the Workgroup that the focus of IGT165 is to ensure that there is nothing within the IGT UNC to stop parties working with the Independent Shrinkage Expert (ISE), including the provision of IGT Supply Point level data. CG clarified that the indication of Shippers bearing costs is not a business rule or within the legal text for UNC 0843, but just the previous view of the Proposer which had now been changed. DM added that this issue had been discussed at a previous Workgroup meeting but then later clarified so they were happy that the Workgroup discussions in the Workgroup Report were clear on this matter.

TL took the Workgroup through the Solution section of the IGT165 Workgroup Report, including the previous Workgroup discussions. TL advised that the Workgroup would be drawing conclusions on key parts of the IGT165 solution, including the business rules, license changes and costs to IGTs. They added that these concluding views would consider the previous Workgroup discussions.

JR asked if it had been recorded whether UNC 0843 is dependent on the successful implementation of IGT165. TL responded that this had been discussed in the previous Workgroup and included within the Implementation section of the Workgroup Report. TL added that conversations had been held with the Joint Office on this dependency at the Cross Code Steering Group (CCSG) and that the Workgroup had previously agreed that IGT165 should not be implemented in the event that UNC 0843 is not implemented.

DM suggested that the Workgroup Report should reiterate that the scope of IGT165 and the two business rules is to ensure full jurisdiction of IGT networks and the provision of data to the ISE which sits under the UNC.

JR asked for clarification on business rule 1, that nothing in the IGT UNC should prevent IGT UNC parties from complying with the ISE. TL shared the IGT165 legal text relating to this business rule. JR raised concerns that there may be a conflict with an existing clause within the IGT UNC stating that

IGT UNC parties should provide information to the Authority if requested. The Chair asked DM about how the ISE will request data from parties. DM responded that the methods for data gathering have been left up to the ISE and have not been defined in either Modification. The Chair asked if there is an appeals process in place for parties regarding data requests. DM responded that there had been an appeals process which was later removed from UNC 0843. The Chair asked if the only signposting to the Authority is that the ISE may contact Ofgem if parties do not provide the requested information. DM confirmed this. JR suggested that in the event of a conflict arising around data requests, that an urgent IGT UNC Modification may be needed to amend this section. The Chair agreed.

DM suggested that it should be noted in the Workgroup Report that both the sections on interaction with UIG and purchasing gas via Gemini are out of the scope for IGT165 and are covered in full under UNC 0843. TL responded that this would be included but added that both areas had been discussed in previous Workgroups, and it could be useful to round off these discussions for Ofgem's benefit. JR asked DM why these are out of scope. DM responded that UIG is only a UNC concept and will remain so as it will still be dealt with under Transportation Principal Document (TPD).

DM suggested that it should be noted in the Workgroup Report that the required License changes to allow IGTs to purchase gas fall under UNC 0843 only as purchasing gas does not fall under the remit of the IGT UNC. TL agreed and added that this would be included within the discussion notes.

TL acknowledged that the previous discussions on costs, including the incorrect suggestion that Shippers would bear the costs. They clarified in the Workgroup Report that the allocation of costs would take place as part of the DSC Change process, with the estimated costs set out by Xoserve in their latest Rough Order of Magnitude (ROM) for UNC 0843 and IGT165. DM agreed and added that they do not foresee any additional costs to IGTs apart from the ISE data requests. JR asked about the ongoing costs for parties to help maintain and run the ISE. DM responded that these running costs would be procured under rules set out in a UNC framework agreement. JR added that it is important to discussions around ongoing costs for the ISE to be captured in the Workgroup Report as the IGT UNC is enabling the ISE and governs the IGT networks, so any contracts involving these networks are relevant, even if the costs themselves are governed under the UNC.

CG noted an action taken by Xoserve at the recent UNC 0843 Workgroup meeting to confirm if it is a regulated procurement service. JL added that they would be happy to provide an update on this action when available. JL confirmed that there is no detail around the costs of procurement as this is a new role, and the procurement exercise is anticipated to take a minimum of 18 months and will commence post approval from Ofgem.. CG added that their understanding is the procurement costs are unknown because this type of procurement is unprecedented for Xoserve. JR added that they felt it was sufficient to call out in the Workgroup Report that the costs to IGTs are currently unknown and will be determined through the DSC Change process. JR added that this means there is no way of currently quantifying the cost-effectiveness of this Modification. There was disagreement between DM and JR on the costs to IGTs, with DM suggesting that the only costs would be the ISE data requests.

JR responded that procurement and running costs for the ISE should be included within the list of costs to IGTs, and DM responded that these costs fall under UNC 0843 only.

TL asked the Workgroup to consider whether a medium impact for both GTs and Shippers is still accurate, given that IGT165 is now an enabling Modification rather than a mirroring Modification when these impact levels were first recorded. DM suggested that the impact on Shippers should be changed to low as any data requests for IGT networks will likely be directed to IGTs. The Workgroup agreed. DM and JR also agreed that the impacted group should be changed from GTs to IGTs.

TL noted the discussions from the March IGT UNC Workgroup that IGT165 will not impact a Significant Code Review, but there may be an impact on Ofgem's ongoing Code Reform programme, and that Ofgem had noted this potential impact. CG added that because the timescales for Code Reform and in particular the Code Consolidation with the UNC are unknown, it is difficult to state whether there will be an impact or not. TL agreed and added that it will be included in the Workgroup Report for Ofgem to consider when making their Authority decision on the Modifications. They noted the minimum 18 month lead time required by Xoserve for procurement and suggested that there is potential for overlap with some of the Code Reform milestones.

CG noted that the Proposer had suggested a high Consumer impact for this Modification, and queried whether this is the case, given that IGT165 is just an enabling Modification and covers the data provisions should the ISE request IGT Supply Point level data, which CG argued does not have a high impact on Consumers. They added that the areas of high Consumer impact are all covered under UNC 0843. DM responded that without IGT165 enabling UNC 0843, these positive benefits cannot be realised and thus should be included within IGT165 discussions. The Chair asked if the costs of ISE data requests would be passed through to Consumers by IGTs. CG responded that they could not answer that.

JR suggested that the Proposer's view that Consumer bills will be lowered as a direct impact of the Modifications is not backed up by any conclusive evidence. TL added that AJ had suggested in the March IGT UNC Workgroup that as IGT165 is enabling UNC 0843, the benefits of UNC 0843 can be considered under IGT165 as well. They asked the Workgroup for their views on this. JR suggested that when Ofgem are considering both IGT165 and UNC0843, it is important that all Workgroup views are illustrated, and they raised concerns that this might not be captured by pulling through the benefits and rationale of UNC 0843. They added that each aspect should be considered individually, and if there are relevant benefits mentioned under UNC 0843, they can be included within the Workgroup Report, along with the views of the IGT UNC Workgroup.

DM added that as Proposer, their views on the Consumer impacts remained the same as stated in the Workgroup Report. TL noted that given the Proposer's views are already documented, the rest of the Workgroup need to give their views on the Consumer impacts of the Modification. The Chair suggested that the Workgroup need to find a consensus on each aspect and analyse the Proposer's rationale for each one. They asked the Workgroup if they felt the benefits of UNC 0843 should be considered under IGT165. JR responded that if the impacts consider UNC0843 benefits and go

beyond the scope of IGT165, this needs to be clearly stated within the Workgroup Report. CG noted that a medium impact for IGTs had been determined on the basis that IGT165 is purely considered a Modification to allow the provision of data to the ISE and thus if UNC0843 impacts are included, the impact on IGTs should be changed to reflect this.

The Chair suggested that the Workgroup should vote on whether UNC 0843 impacts are applicable to IGT165. JR noted that the Modification references UNC 0843 throughout the Proposal form and suggested that it should have clearly stated that IGT165 only refers to the data provisions of IGT Supply Point level data. They added that even if the Workgroup vote to assess IGT165 on impacts separately from the benefits of UNC 0843, the Proposer has not followed the same process when providing rationale for their views and so the Proposer and Workgroup would be assessing this Modification differently. TL responded that if the Workgroup decide to assess IGT165 without considering the benefits of UNC 0843, then they would make it clear in the Workgroup Report how the Proposer and Workgroup have chosen to assess this Modification differently.

DM noted that the Workgroup had deferred this section in the previous Workgroup meeting and added that it is important that the Modification moves forward, considering Workgroup attendees had been asked to bring their views on this section to the meeting. They added that the Workgroup needs to provide their views on Consumer impacts for IGT165 and provide rationale for these views, regardless of if they agree with the Proposer's views and rationale. The Workgroup agreed to assess all aspects on an individual basis and determine whether UNC0843 benefits are relevant or not.

CG suggested that they think there is a neutral impact for improved safety and reliability, as IGTs are already appropriately regulated in this area and the Modification will not have an impact. CH agreed.

JR suggested that they could not support the Proposer's view that Consumers would face lower bills as they have seen no evidence to support this view. They added that the additional costs of procurement and ongoing costs of the ISE must also be considered. They suggested that there could even be a negative impact on Consumer bills due to these additional costs, although they also noted there is no evidence to support this. CG and CH agreed. DM asked if this can be stated as the IGTs' view in the Workgroup Report rather than the Workgroup's view. TL responded that they would note down all specific comments relating to the discussion, but that the overall opinion of the Workgroup would be written as such, not just from the IGTs. The Chair added that reflective views are needed from all Workgroup attendees and asked present Shippers for their views. LG responded that they had no specific comments to add. There was no dissenting views put forward by the Workgroup.

CG suggested that there is a neutral impact on reduced environmental damage for IGT165 and added that the reduced environmental damage resulting from UNC 0843 is out of scope, and that IGTs are already incentivised to reduce emissions through existing arrangements. JR agreed.

The Chair noted that the Proposer had suggested a neutral impact on improved quality of service, noting that elements of this had been touched upon in other areas. JR responded that if it is only considering IGT165, they agreed it would be neutral, but if the impacts of UNC 0843 are to be considered, they suggested there would be a negative impact. JR added that this is on the basis that

there is an existing process for Shrinkage that could be amended to increase its efficiency at a much lower cost. CG and CH agreed.

JR suggested that for benefits for society as a whole, if the Workgroup is considering the impacts of UNC 0843, and the ISE does what the Proposer intends, then they would agree with the Proposer that there will be a positive impact. They added that these benefits are not within the scope of IGT165. CG suggested that there would be a neutral impact even if the UNC 0843 impacts are considered, adding that there is no evidence that gas leaks will be reduced, particularly as the ISE's methodology is unknown at this point. CH agreed. DM asked to clarify their rationale, stating that UNC 0843 will incentivise the reduction of gas leaks rather than stating that there will definitely be a reduction. The Chair determined that the majority of the Workgroup had decided to support a neutral impact.

DM asked if it could be clarified in the Workgroup Report that the views of the Workgroup on the impacts of IGT165 in this meeting have only been provided by IGTs. TL responded that they would note this. CG asked if it could also be clarified that a Shipper was present at the Workgroup meeting.

TL advised that they would include a caveat in the Workgroup Report on UNC 0843 being included in the discussions on impacts of IGT165 to keep it in line with the Proposer's assessment, noting that not all attendees agreed with the approach.

TL advised that the Proposer had not identified any cross-Code impacts for IGT165. They added that as usual, any IGT UNC Modifications mirroring or enabling a UNC Modification is not stated to have a UNC impact. CG queried this and asked if there would be a UNC impact if this UNC 0843 was implemented but IGT165 was not. TL responded that the UNC and Xoserve had both agreed there is a dependency of UNC0843 for IGT165 to be implemented, and it would not be possible for only one of the Modifications to be implemented. JL agreed. TL advised that they would note the dependency and that there are no direct cross-Code impacts for IGT165.

DM extended their rationale for the environmental impacts of IGT165, adding that UNC 0843 will incentivise the reduction of Shrinkage Model Error. CG suggested that there is no evidence that UNC 0843 will reduce gas leaks, and looking at the environmental impacts of IGT165 alone, ISE data requests will not have an impact on this area.

TL advised that following the March IGT UNC Workgroup meeting, they had updated the ROM section to reflect the information in the latest ROM published by Xoserve. They added that the changes in this section had been marked in the latest version of the Workgroup Report.

TL advised that they would update the Workgroup Report with the discussions held in this meeting ahead of the May IGT UNC Workgroup meeting. They added that the aim would be to finalise the IGT165 Workgroup Report in the next meeting, specifically to confirm that the Workgroup is happy with the discussions on the impacts and cover the relevant objectives.

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 Workgroup. CG informed the Workgroup 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 and LB took the Workgroup through the proposed legal text. 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. JL confirmed this.

LB noted that an updated version of the IGT175 Modification Proposal had been published due to a typo identified in the previous version. CG and TL also noted a typo found in the meeting and advised that this would be amended.

CG, LB and TL clarified that one of the proposed changes included in IGT175 had been to remove a reference to Paragraph 1.3.8 of the UNC Transition Document TDIIC which had been removed as part of [UNC 0881 - Review and consolidation of UNC Transition Document TDIIC - Transitional Rules](#). It was agreed that this required change had first been recorded on the Cross-Code Modification Implications Tracker and then the Known Issues Register, and that the Workgroup Report would be updated to reflect this.

The Chair asked how some of the proposed amendments in Part K were identified. CG responded that three required changes were identified whilst looking at another amendment to Part K already listed in the Known Issues Register as a housekeeping change.

NK raised concerns that there may be a proposed change in the IGT175 legal drafting that could have an impact on IGT176, focusing on a mention of the National Transmission System (NTS). (NK withdrew this concern later in the meeting after checking IGT176 and UNC 0887). CG and TL agreed to continue with IGT175 as planned, with IGT176 able to make any necessary changes to the IGT UNC later to help facilitate UNC 0887. NK and the Chair agreed that any inconsistencies can be covered as part of the discussion on the IGT176 legal text.

LB took the Workgroup through the IGT175 Workgroup Report, including the notes taken on the previous section covering the Modification legal text.

Impacts

CG advised that as IGT175 is a housekeeping Modification, that they had not identified any impacts. They added that although a lot of the changes in IGT175 are born out of UNC Modifications, it is common practice to declare no cross-Code impacts were identified on the UNC. CG added that they believed IGT175 would have no impact on a Significant Code Review or any other significant industry change projects. The Workgroup agreed.

Legal Text

The Chair asked the Workgroup if they believed the legal text fully met the proposed solution for the Modification. The Workgroup agreed.

Relevant Objectives

CG advised that Relevant Objective (F) – Promotion of efficiency in the implementation and administration of the Code had been identified as a positive impact for this Modification. The Workgroup agreed.

Governance

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

Implementation

CG advised that they would support the earliest possible implementation date. TL added that according to the Modification timetable, a decision could be expected on this Modification at the May IGT UNC Panel meeting. TL suggested that including IGT175 within either the standard releases planned in June or November is possible. LG supported a June implementation date. The Workgroup agreed to support a June implementation date.

Recommendations:

The Workgroup agreed that:

- The Modification should be subject to Self-Governance.
- The legal text fully delivers the intent of the Solution.
- The Modification should be implemented as part of the June 2025 standard release.
- All impacts had been identified for the Modification.
- The Modification should be issued for Consultation

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

TL and NK provided an introduction of the Modification to the Workgroup. TL advised that that IGT176 had been raised to make any necessary changes to the IGT UNC to help enable [UNC 0887](#). TL

added that at the moment, all IGT Supply Points are classified as CSS Supply Points, but this will need to be changed as any Supply Points directly connected to NTS networks are non-CSS Supply Points. TL added that the IGT UNC will need to replicate the UNC's non-CSS provisions so that Supply Point Administration for indirectly connected National Transmission System (NTS) exit is treated identically to direct connect equivalents.

NK informed the Workgroup that they have been working on the Modification legal text and had made progress on the non-CSS elements of the drafting. They added that they have spoken with the Proposer of UNC 0887 to ensure that the two Modifications are aligned. They added that they have been able to reference existing sections of the UNC and TPD as part of the legal drafting, which should also have an added benefit of bringing the two Codes closer together ahead of Code Consolidation. NK added that they are replicating the UNC rules for IGT176, so that Shippers would operate for a NTS connection via an IGT network in the same way that they would operate for a direct connection on an NTS system.

TL advised that the next steps would be to continue the introduction of this Modification at the May Workgroup meeting, as well as introducing some more detail by looking at the legal drafting NK has worked on. TL added that they would speak to NK offline to discuss which sections of the IGT UNC need changing and the plan to introduce these sections at future Workgroup meetings. TL noted that the Workgroup Report for UNC 0887 is due to be sent to UNC Panel in April, adding that UNC 0887 is at an advanced stage. TL added that the dependency of UNC 0887 on IGT176 was acknowledged at a UNC 0887 Workgroup meeting, and that Ofgem will wait to assess both Modifications together. NK showed an example of their ongoing work on the IGT176 legal text coupled with TPD Section G, which they added they would take the Workgroup through in more detail at the next Workgroup meeting.

STANDING ITEMS

The Workgroup agreed to defer all remaining items on the agenda to the May IGT UNC Workstream meeting due to a shortage of time.

The next Workgroup meeting is scheduled for Thursday 8th May 2025.

Annex 1 – Actions Table

Reference	Action	Owner	Status
There are currently no open Workstream actions.			