

IGT UNC Modification Panel Meeting

Final Minutes

Friday 25th April 2025

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Aleksis Butler	AB	BUUK	Observer	
Charlotte Gilbert	CG	BUUK	Observer	Proposer for IGT175
Eilidh McNally	EM	Last Mile Gas	Pipeline Operators	Present for Items 1-3
Ellie Osobina	EO	Ofgem	Authority	
Graeme Forbes	GF	Gemserv	Code Administrator	
Jenny Rawlinson	JR	BUUK	Pipeline Operators	
Lydia Bentley	LB	Gemserv	Code Administrator	
Lee Greenwood	LG	Centrica	Pipeline Users	
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 from Cher Harris (Indigo Pipelines). It was noted that JR would be acting as Cher Harris' 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, but there were no further items added.

3. Approval of the previous minutes (25-03 and 25-03 Reconvened)

The CA invited comments on the March 2025 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 two outstanding actions:

- **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.** TL informed the Panel that they had arranged a call with Kirsty Dudley and Xoserve since the March Panel meeting. They added that Xoserve had agreed the report would be a good idea as they had spent some time implementing the IX solution

and were keen to see it implemented successfully. TL added that Simon Harris (Xoserve) picked up the action to look into the report and they had talked through what may be included within the report, based on the data they had available. TL advised that the next steps were for the report to go through internal governance processes before it could be produced as the data that would be used to produce it would be considered under Data Services Contract (DSC) governance. TL added that it was not clear whether an XRN will need to be raised for the report, but Kirsty had volunteered to raise this if required to get the report completed as soon as possible. TL advised that a copy may be available for the May Panel meeting, but Xoserve could not confirm this until after further internal evaluation. The Panel agreed to close this action. Please see Item 5 for further discussions.

Action closed.

- **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.** TL informed the Panel that they had begun reaching out to the parties who had responded to the IGT173 Request for Information (RFI) and asked for updates on any non-compliant parties they had mentioned in their responses, and whether these parties had now implemented the IGT173 solution. The Panel agreed to close this action. Please see Item 5 for further discussions.

Action closed.

Modification Business

5. IGT173 – Gateway Delivery for RPC data

TL took the Panel through the updates on the two outstanding actions above relating to the ongoing matter of non-compliance from some IGT UNC parties regarding the IGT173 solution.

TL advised that early talks on costs for the reports had taken place with Xoserve, and it had been suggested to mirror the cost breakdown of the related XRN5720 of 60-40 ratio between IGTs and Shippers but noted that this is only an initial starting point. JR noted the expected costs and asked if there are other ways to identify parties who are not using the IX. They suggested that this report may take up unnecessary time and resources and that the IGT UNC Panel should look at exhausting other options first.

TL advised that early discussion on this Report included basing it on IGTs/Shipper who have an active IX account, who are actively receiving/sending RPC files on the IX and then consider those parties further to see if we could determine which of them were non-compliant. They added that Xoserve were looking into what information is available to them before the plans/specification for the report are finalised. JR responded that the report does not sound particularly useful and suggested there are other ways to identify non-compliant parties. LG responded that it was their understanding that the RFI responses had provided conflicting information from parties on their compliance, or that the responses had not named the non-compliant parties they are aware of. TL advised that this was

the case, for example an IGT had responded to the RFI stating that they are using the IX to send RPC files, but a Shipper response indicated that the same IGT was sending RPC files via email instead. TL added that only six parties responded to the RFI, so it is difficult to state that these responses paint a complete picture of the non-compliance situation.

CG and JR asked what the normal process would be in the event of a general compliance issue, adding that this approach is unprecedented as IGT173 is a newly implemented Modification. JR acknowledged the lack of teeth in the IGT UNC for dealing with compliance matters but added that the Code Administrator directly writing out to the non-compliant parties and then handing the matter over to Ofgem if the party still do not cooperate, is a possible and effective route to take. The Chair agreed and added that if the Code Administrator indicates that they will report the party to Ofgem it may help to incentivise a party to become compliant with the IGT UNC. They added that the only option within the IGT UNC is stopping a party from trading, but this would not be appropriate in this scenario.

JR suggested that any parties who are concerned about other parties not adhering to the Code should liaise directly with the parties and then report to the IGT UNC Panel for breach of Code if this is unsuccessful.

LG suggested that the IGT UNC Panel should seek to gain an indication of potential costs for the Xoserve report before deciding to go ahead with it. The Chair asked if other Panel members would support the request of a Rough Order of Magnitude (ROM) for the report. JR asked LG why the report would be useful. LG responded that it would help to clarify which parties are non-compliant, allowing the IGT UNC Panel to then reach out directly to said parties. JR added that they would not be in support of a ROM, as that would be an added unnecessary cost on top of the cost of the report.

LG suggested that it may be worth speaking to the Proposer of IGT173, potentially to talk about how they wished for this matter to proceed, and whether they would want to cover the costs of the report. JR responded that as IGT173 is a live in Code they are no longer a Proposer. They added that the Proposer is a party to the IGT UNC and should report a breach of Code if they wish to. The Chair agreed with this interpretation of the Code.

JR asked about Action 25/03 – 02, with the Code Administrator reaching out to all IGT UNC parties. TL responded that they had misinterpreted the action that had been taken and that it was only for reaching out to those IGT UNC parties who had responded to the IGT173 RFI. The Chair asked the Panel if they would want the Code Administrator to write out to all parties now and ask for an update on their positions, potentially indicating that any non-compliant parties will be referred to Ofgem. JR responded that they would prefer for parties to come forward to the Panel if they have any issues with non-compliant parties.

TL advised that they have the identities of the non-compliant parties named in the RFI responses, aside from one response that named “a handful of small Shippers” without naming them. TL added that the non-confidential version of the RFI responses had been published, but the confidential information could be made available to Panel members if the Panel wished. JR responded that it should be up to a IGT UNC party to make an official complaint to Panel before any further action is taken.

LG suggested that the Panel should be looking into the reasons why some parties have not implemented the IGT173 solution, given the time and resources used in developing and agreeing the Modification and Solution and added that this could set a precedent for future Modifications. JR responded that usually the IGT UNC Panel do not follow up with other Modifications to determine whether every party has fully implemented the Solution. They added that they understand that the Proposer has put a lot of effort into IGT173 and wants to see it successfully implemented, but that they should bring it to Panel as a breach of Code. JR added that they agreed with LG that writing out to the non-compliant parties was a sensible option, but this could be done now and requesting the Xoserve report was not necessary. CG suggested that the Panel could write to the RFI responders and ask if they wished to raise a breach of Code to Panel, which would allow the Code Administrator to contact the named non-compliant parties.

The Chair reminded the Panel of their remit, which does not include performance or compliance assurance. They added that the only performance assurance is the settlement accuracy scheme under the UNC, which does not apply to this situation. JR agreed and added that it is not the Panel's role to police parties to ensure they are following all IGT UNC obligations.

TL advised that given action 25/03 – 01 for the Code Administrator to ask Xoserve to produce the report on behalf of Panel, that this work has already commenced, and costs may have already been generated. The Chair suggested that the question needs to be whether the report is paused or terminated. LG responded that there is not much difference, and they were happy to terminate the report, adding that it could be resurrected in the future if necessary. JR supported the termination of the report.

LG suggested that the next action should be to write out to the RFI responders, ask if the issues on non-compliance still persist and invite them to bring the issue and the names of the parties directly to Panel. JR agreed and added that these parties need to be encouraged to formalise these concerns. TL suggested that the Code Administrator write out to the responders to thank them on behalf of Panel and ask that a formal request should be submitted to Panel in the event of further grievances. JR suggested that this should be a general email. The Chair confirmed the action that the email should state that Panel are aware of some concerns of non-compliance and parties are invited to raise this directly with Panel. JR agreed, adding that this would be the normal process with any concerns of breach of Code.

The Chair confirmed that the Panel had agreed on three actions to take this matter forward: to ask Xoserve to terminate the report, to thank the responders to the RFI, and to send out general comms inviting parties to bring any matters of non-compliance formally to Panel. JR and LG agreed with this approach.

25/04 – 01: Code Administrator to ask Xoserve to terminate the IGT173 implementation report request.

25/04 – 02: Code Administrator to write out to IGT UNC parties who responded to the IGT173 RFI to express their thanks on behalf of the IGT UNC Panel

25/04 – 03: Code Administrator to write out to all IGT UNC parties inviting them to formally raise any matters of non-compliance with the IGT UNC Panel

Please note that EM was not present for the discussion on Item 5.

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

LB 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 \(REC 3.0\)](#) 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.

Solution

LB took the Workgroup through the IGT175 Workgroup Report. CG advised that some typography errors and gaps in the Solution section that were identified during the April Workgroup meeting had been amended.

LB 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. LB advised that the Workgroup had agreed with Xoserve's consensus.

LB advised that the Proposer for [IGT176 - Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#) had raised a concern in the April Workgroup meeting that a proposed amendment to a clause regarding the National Transmission System (NTS) would have an impact on IGT176. LB added that the Proposer had later withdrawn this comment after further review of the legal drafting for IGT175 and IGT176.

LB noted that the Workgroup had been happy that no further work is required on the Solution. The Panel agreed.

Governance

The Chair asked the Panel if they were happy that IGT175 should still proceed as a Self-Governance Modification. LB added that the Workgroup had agreed with this approach. The Panel agreed that this Modification should be subject to Self-Governance.

Timeline

LB took the Panel through the proposed dates for the consultation period of the Modification. They advised that the IGT175 consultation is due to be published on Monday 28th April and will run for the standard three week period, ending on 20th May, accounting for a bank holiday. LB noted the May Panel meeting date of 30th May and added that they hoped to publish the Final Modification Report (FMR) by 23rd May for paper day. The Chair asked the Panel if they would be happy for the FMR to be published as a late paper if it was not able to be published by 23rd May. The Panel were happy with this approach.

Recommendations:

The Panel agreed that:

- The Modification should be subject to Self-Governance.
- The legal text fully delivers the intent of the Solution.
- All impacts had been identified by the Workgroup, and there was no impact on a Significant Code Review.
- The Modification should go out for a standard three week consultation.

Please note that EM was not present for the discussion or the decision on Item 6.

Updates from Workgroup

7. Workgroup Report

The Panel had no comments on the Workgroup Summary.

Authority Updates

8. Authority Update

EO provided the Panel with the following updates:

- Ofgem have now published a [second consultation on Energy Code Reform](#). It covers their approach to implementing the Code governance reforms through the Energy Act 2023. This consultation sets out Ofgem's proposals on a range of policy areas on how Code governance reform will be implemented in practice, including sections on the Code Modification process, Stakeholder Advisory Forums, consequential Code changes, cost recovery for BSC and REC codes, directing central system delivery bodies and Ofgem's implementation and assurance approach and transition plan. The consultation will close for responses on 29th May 2025 and responses can be sent to industrycodes@ofgem.gov.uk
- Ofgem are also seeking participation from stakeholders in a series of workgroups to help with the detailed implementation of Code Reform. If you would like to volunteer, please review the call for expression of interest published alongside the consultation, and then respond by email to industrycodes@ofgem.gov.uk by close of play on 25th April 2025.

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. Ofgem Code Reform Consultation

TL noted an Ofgem event on 30th April that will provide a high level overview of the Code Reform consultation proposals. EO added that the event registration is still open for all parties, and to email industrycodes@ofgem.gov.uk if they are interested.

GF noted the proposals within the latest consultation and advised that they are here to support IGT UNC parties during the transition period to the new Gas Network Code and will be catching up with individual parties over the next few weeks to offer additional support.

11. IGT MPRNs

LG advised that this issue had been raised internally, and they are raising it with Panel for discussion. LG noted that when an IGT purchases a network of existing Supply Points, they create new MPRNs for these Supply Points, but there is no mechanism to update the industry or customer with regards to the new MPRNs.

The Chair advised that this is a known issue and provided some general information on the matter. The Chair added that the MPRNs are not changed when there is a transfer of assets between IGTs, this only occurs when an IGT purchases from a Gas Distribution Network (GDN). They added that

when there is a transfer of assets from a GDN to an IGT, Xoserve will assign new MPRNs as the MPRN indicates the type of transporter. The Chair added that it is the Supplier's responsibility to inform customers of who their gas transporter is, but they are not clear how it is publicised when an IGT has purchased a part of a GDN network.

LG advised that they receive lots of customer queries where they provide an MPRN that turns out to be terminated and the Supplier has no way to proceed as they do not know the new MPRN. TL added that the Code Administrator often receives similar queries.

The Chair suggested that this item should be discussed at the May IGT UNC Workgroup meeting to encourage a more fulsome discussion on the matter. The Panel agreed. TL added that they will give notice to the Xoserve representatives that this item will be discussed at Workgroup. The Chair agreed that it would be helpful to prepare Xoserve.

The next IGT UNC Panel meeting is scheduled for Friday 30th May 2025.

Annex 1 – Actions Table

Reference	Action	Owner	Status
25/03 - 01	<i>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.</i>	Code Administrator (TL)	Closed
25/03 - 02	<i>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.</i>	Code Administrator	Closed
25/04 - 01	Code Administrator to ask Xoserve to terminate the IGT173 implementation report request.	Code Administrator	Open
25/04 - 02	Code Administrator to write out to IGT UNC parties who responded to the IGT173 RFI to express their thanks on behalf of the IGT UNC Panel.	Code Administrator	Open
25/04 - 03	Code Administrator to write out to all IGT UNC parties inviting them to formally raise any matters of non-compliance with the IGT UNC Panel.	Code Administrator	Open