

Ofgem Data Best Practice Consultation - IGT UNC Draft Response

Q1. Do you agree with our intent to expand DBP Guidance into the codes?

Yes, we agree this intent.

Expanding DBP Guidance into the codes is a logical and beneficial step. It aligns with Ofgem's broader digitalisation strategy and ensures that all code bodies and Parties adopt consistent, interoperable, and user-led data practices. This will improve transparency, data quality, and system-wide efficiency.

Q2. Do you agree with the proposed deadline six months after the licence condition is applied for consequential code modifications? If not, please state your reasons specific to the relevant code and modification process.

No, we do not agree with the proposed deadline.

Setting a deadline of six months after the licence condition is applied will be problematic given the unforeseen operational and financial implications associated with implementing changes at the same time as ongoing code consolidation.

Merging the IGT UNC and UNC into the new Gas Network Code (GNC) will be the first industry codes to be consolidated under the code reform programme, introducing a higher risk profile to the gas codes, their code administrators (Joint Office and Talan Ltd) and affected Parties.

While the intention to expedite the process is understood, it may be more practical to wait until the new code (GNC) has been designated and the new licenced code manager for the GNC has been appointed. This approach would allow for better preparation and alignment among code bodies (existing and future) and Parties, ultimately leading to a more effective implementation.

Code modification queues and resource constraints vary across codes. However, the IGT UNC and UNC has the additional responsibility of considering the impact of change under existing (IGT UNC/UNC) and near future (GNC) regulatory requirements. The proposed timeframe provides insufficient flexibility for IGT UNC Parties and code administrators to evaluate potential impacts and plan for accordingly, placing a greater burden on the modifications when they are subsequently introduced.

The provision of the IGT UNC Code Administrator is governed by a commercial contract. The resourcing required to fulfil the requirements set out in the DBP consultation will be significant and it remains unclear which parties to the contract would be required to undertake the work. In addition, the requirement for reviewing the documents would indicate that SLAs for performance will be needed. There could be significant contract renegotiations required which will take time to conclude before the work on the BDP can begin. Regardless, given the low levels of engagement in IGT UNC from IGTs and Shippers achieving any kind of consensus on BDP will be challenging.

An alternative way forward could be for the IGT UNC Panel to work in collaboration with the UNC Panel and then adopting the UNC principles once those are agreed, smoothing the way for the joining of the two Codes. But again, this will not be possible within 6 months and as IGT UNC understandably lags behind UNC the UNC principles will need to be agreed before they can be adopted into the IGT UNC.

Another option could be to have a more appropriate obligation on IGTs to have a less formal approach for the DBP licence condition, then move to a more formal acceptance of DBP as defined under the GNC, on the new code's eventual designation.

Q3. Do you agree with the minded-to position that an obligation to produce DSAPs is suitable and proportionate for code bodies? If not, what alternative would you propose to achieve the same or greater benefits?

Yes, we agree with this obligation.

Requiring IGT UNC code bodies to produce DSAPs is proportionate and beneficial. It promotes transparency, encourages engagement with data users, and supports continuous improvement. DSAPs will help IGTs demonstrate how they are meeting DBP principles and adapting to evolving digital needs.

However, as indicated in our response to Q2 (see above), we believe that more time is needed to understand the detailed requirements and their associated costs. As a new and additional service requirement, code administrators will need to prepare a costed proposal outlining what form the DSAPs will take and an indicative price for approval by Parties.

Q10. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Gas Transporter Licence amending the UNC and IGTUNC?

As indicated in our response to Q3 (see above), we have some concerns about the pace of introducing the proposed change.

At this stage, we are not able to fully assess the implications of change and would welcome a longer timeframe to better evaluate potential risks and issues.

Therefore, our preference would be for the full obligation to sit in the new Gas Network Code (GNC) while, as an interim measure, there is an obligation on IGTs "to be ready". We believe this would support transitional activities and make for a better outcome.

Q11. Do you think this proposed principle merits discussion at the CACoP forum for inclusion in CACoP v7.0?

Yes, we believe this principle merits discussion at CACoP.

Including a principle in the CACoP that obliges administrators to follow DBP Guidance is appropriate and recommended. It would formalise expectations across all codes, including the IGT UNC, and ensure consistent service levels and data practices. We believe the CACoP Forum is the right venue for this discussion. The best practice can be advised through Code Administrator 'critical friend'

scenarios to obtain benefits at the earliest opportunity with the formal governance through Code following to support the already operational application.

We also note that there is some discussion on the future of CACoP under code reform.

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