



IGT UNC 25-09 Modification Workstream Meeting

Draft Minutes

Thursday 11th September 2025 via Teleconference

Attendee	Initial	Organisation	Notes
Ali Beard	ABE	Gemserv	Chair
Aleksis Butler	AB	BUUK	Proposer for IGT178 and IGT179.
Ashley Foster	AF	Indigo Pipelines	
Bradley Wood	BW	Centrica	
Eilidh McGrevey	EM	Last Mile Gas	
Ellie Osobina	EO	Ofgem	
Helen Gilbert	HG	National Energy System Operator (NESO)	
Kathryn Adeseye	KA	Xoserve	
Talia Lattimore	TL	Gemserv	Code Administrator
James Rees	JR	Gemserv	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting. There were apologies received from Anne Jackson (AJ), Cher Harris (CH), and Harry Firth (HF). It was noted that Ali Beard (ABE) would be covering as Chair for AJ, and James Rees (JR) would be covering as Secretariat for HF.

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 25-07

The Chair and JR informed the Workgroup that several comments were received for the draft 25-07 Modification Workstream meeting minutes prior to the meeting. They took the Workgroup through all of the comments received prior to the meeting. 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:

25/07 – 01: Code Administrator to ask IGT UNC Panel if they wish to submit a response to Ofgem's Best Data Practice consultation following the Workgroup's recommendation. TL advised that the Panel had agreed to submit a consultation response at their July meeting. TL added that the Code Administrator had prepared a draft consultation response for the July meeting, which

the Panel had been happy with, but requested that all IGT UNC parties have a chance to comment on the response. TL advised that the response had been sent out to industry for five Working Days, with one comment received and the consultation response duly updated. TL advised that after the Panel had agreed to the updated consultation response, it had been submitted to Ofgem ahead of the deadline of 11th August. **Action closed.**

MODIFICATIONS

5. IGT178 - PC4 Read Submission Window Extension

AB introduced the Modification to the Workgroup. AB explained that IGT178 seeks to align the IGT UNC with [UNC 0884](#) regarding Product Class (PC) 4 read submission windows. The Modification proposes to mirror the extended read submission windows introduced under UNC 0884, which allow for more flexibility in submitting reads for both domestic and non-domestic premises.

TL took the Workgroup through the Modification Proposal Form and Workgroup Report and asked the Workgroup for their views of different areas of the Modification.

Solution

TL took the Workgroup through the legal text and proposed solution. TL advised that the Modification is looking to add a reference to Section M of the UNC Transporters Principal Document (TPD) within the IGT UNC, to align the maximum permitted read submission window to what UNC 0884 has introduced in the UNC.

TL advised that the previously hardcoded read submission window of 25 Supply Point System Business Days (SPSBDs) had been removed from Part E, Section 11.2, and replaced with the aforementioned reference to TPD Section M. TL took the Workgroup through the approved legal text for UNC 0884, to show what the IGT UNC would be referencing should IGT178 be implemented. TL noted that this cross-referencing of UNC TPD in the IGT UNC would mean that any future changes to TPD Section M would automatically apply in the IGT UNC. BW and AF expressed support for the proposed changes to the IGT UNC. TL asked the Workgroup if they felt the legal text supported the intent of the solution and Modification. The Workgroup agreed that it did, and that no further work was required on the solution.

Impacts

TL noted that the Proposer had indicated that IGT178 would not impact a Significant Code Review (SCR) nor a significant industry change project.

AB asked of any SCRs currently taking place that would impact IGT178 or another IGT UNC Modification. The Chair and TL responded that they were unaware of any current SCRs impacting the IGT UNC. TL added that the main area to consider at the moment is the ongoing Code Reform project, but Modification impacts are difficult to properly consider due to the currently unknown

timelines of the new Gas Network Code (GNC). The Chair suggested that the IGT UNC further referencing the UNC could improve the ease of merging the two Codes as part of Code Reform.

The Workgroup considered the Proposer's view and agreed there would be no impacts on an SCR or significant industry change project.

TL took the Workgroup through the consumer impacts. TL noted that the Proposer had identified a positive impact on lower consumer bills, referencing that the proposed new submission window would offer greater flexibility for resolving meter reading issues, increase billing accuracy and reduce the need for estimations. The Proposer had added that when meter reads fail validation or are delayed, this can lead to inaccurate billing and unnecessary site visits, leading to a poorer consumer experience. TL noted that other areas of the consumer impacts had been identified as neutral for IGT178 by the Proposer, and the rationale mirrored the discussions that had previously taken place under UNC 0884.

BW questioned whether the Modification would directly lead to lower consumer bills. They agreed that extending the submission window would increase billing accuracy but added that this could potentially lead to higher bills for some consumers. They suggested that a more accurate consumer impact would be an increase in the quality of service. The Chair agreed. AB agreed with this view and indicated that they would be happy to support this rationale as Proposer, changing the impact on consumer bills to neutral, and quality of service to positive. AF also agreed with BW's rationale. The Workgroup had no further comments on the consumer impacts.

TL noted that the Proposer had not identified a cross-Code impact as a result of IGT178. They added that the Proposer had noted this Modification had been raised as a result of UNC 0884 being raised in the UNC. BW asked what the normal process is for identifying cross-Code impacts when an IGT UNC Modification is tied to a UNC Modification. TL responded that if a dependency has been identified between the Modifications, which require both to be implemented in order to be effective, then a cross-Code impact on the UNC would be identified as part of the IGT UNC Modification. TL added that there is no impact on the UNC or UNC 0884 if IGT178 is not implemented, and the Proposer raised IGT178 afterwards in order to align the submission window with the UNC. AB agreed with this rationale as Proposer and indicated that they would have identified a cross-Code impact if IGT178 was an enabling Modification.

The Workgroup considered the Proposer's view and agreed there would be no cross-Code impacts.

TL noted that the Proposer had not identified any environmental impacts. The Workgroup considered the Proposer's view and agreed there would be no environmental impacts.

TL took the Workgroup through the relevant objectives and noted that the Proposer had identified a positive impact on (F) – Promotion of efficiency in the implementation and administration of the Code. They added that the Proposer's rationale set out that the Modification assists in further aligning the IGT UNC and the UNC, ensuring a uniform approach for all gas industry parties. The Workgroup

considered the Proposer's view and agreed there would be a positive impact on Relevant Objective (F).

Implementation

TL advised that the Proposer's recommended approach was to implement IGT178 as soon as possible, conditional to the implementation of UNC 0884. TL added that the Proposer hoped for IGT178 to be aligned with the potential implementation date of UNC 0884 if possible.

HG asked if it would be appropriate to implement IGT178 even if UNC 0884 is not implemented. They noted the current hardcoded submission window in the IGT UNC and added that aligning the submission window with the UNC would still promote increased efficiency and prevent a future Modification having to be raised to make further changes. TL responded that the Workgroup would have to consider whether they would prefer to keep the current 25 SPSBD window hardcoded in the IGT UNC or revert to the current UNC submission window. TL added that the 25 SPSBD window had been implemented in the IGT UNC to ensure that Shippers were not obligated to pay for a must read submitted outside of this window. TL and HG agreed that this would be out of scope for the Modification.

KA added that they believed that the current UNC submission window was also hardcoded to 25 days and asked why IGT178 could not be implemented if UNC 0884 was rejected. TL responded that they would have to look at the current provisions in both Codes to assess the impacts on IGT UNC parties if the IGT UNC chose to cross-reference the UNC regardless of if UNC 0884 is implemented. AB added that the intent of IGT178 is to align the IGT UNC with the new submission window proposed by UNC 0884, not to blindly align the IGT UNC with the UNC. KA responded that it may be appropriate to update the proposed implementation approach to include reference to XRN 5906 which is the reference for UNC 0884. TL agreed to include this. The Workgroup unanimously agreed with the proposed implementation approach.

Governance

TL advised that the Proposer had indicated IGT178 should be treated as an Authority Decision Modification. TL added that this is due to UNC 0884 also being subject to an Authority Decision. TL took the Workgroup through the rationale provided for selecting the governance route for UNC 0884, where it was seen as impacting competition or commercial activity in the shipping, transportation or supply of gas conveyed through pipes. The Workgroup unanimously agreed that IGT178 should be subject to an Authority Decision.

Timeline

TL advised that should both the Workgroup and Panel agree to IGT178 going out for consultation, this consultation could be issued on Monday 29th September, one Working Day after the September IGT UNC Panel meeting. TL added that if the Panel agree to a standard consultation length of 15 Working

Days, it will close for responses on Monday 20th October. TL advised that the Code Administrator would be able to finalise and publish the Final Modification Report by 24th October, the paper day for the October Panel meeting, and that the Panel could send the Modification off to the Authority on 31st October.

Recommendation:

The Workgroup unanimously agreed that:

- This Authority Decision Modification should proceed to consultation.

6. IGT179 - NExA Tables Clarification Update and Related Documents

AB introduced the Modification and took the Workgroup through some [slides on IGT179](#). AB explained that IGT179 aims to clarify the publication of NExA tables and correct errors in variance reporting. The Modification includes updates to ancillary documents, specifically the NExA CSEP Ancillary Agreement and the NExA Procedures Document, to improve clarity and ensure accurate representation of data. AB took the Workgroup through the errors in the current NExA tables they had identified, which used the incorrect current values for the variance table, which had a knock-on impact on the new collation values for the next year. They also showed the proposed changes to the NExA tables, which would state the time period for when the “current” values are valid from, and whether the values have been approved or proposed.

AB noted that other considerations had been included in the Modification on improving the AQ Review process further and indicated that they were keen for Workgroup views on these considerations. They added that these considerations were out of scope for IGT179. These considerations included simplifying the language used on the IGT UNC website to help distinguish a live document from other reference documents and locating the current CSEP NExA table template on a separate webpage alongside with other templates used and provided by the Code Administrator. TL responded that they would be happy to make changes to the IGT UNC website and offered to meet AB separately to talk through these potential changes further. TL noted that the Code Administrator would need to review the time required to make these changes to the IGT UNC website first and suggested that they could provide this feedback at a future Workgroup meeting.

25/09 – 01: Code Administrator to review the time required to implement changes to the IGT UNC website suggested by BUUK

TL took the Workgroup through the Modification Proposal Form and Workgroup Report and asked the Workgroup for their views of different areas of the Modification.

Solution

TL took the Workgroup through the legal text and proposed solution. TL advised that the Modification is looking to update the NExA table template as AB mentioned previously, by updating the template

link and adding extra detail to provide further clarity on the dates when the values in the table are relevant. They added that although all of the proposed changes are to an ancillary document rather than the main IGT UNC Code, these changes are still treated as a normal IGT UNC Modification. TL added that as the NExA tables are included within the February IGT UNC Release every year, the proposed table would state February 2XXX – February 2XXX, with the NExA values continuing to be updated and approved annually. TL advised that the NExA tables are approved at the Workgroup and Panel meetings each summer, and each of the three tables are presented in each meeting.

TL asked the Workgroup if they felt the legal text supported the intent of the solution and Modification. The Workgroup agreed that it did, and no further work was required on the solution.

Impacts

TL noted that the Proposer had indicated that IGT179 would not impact a Significant Code Review (SCR) nor a significant industry change project. The Workgroup considered the Proposer's view and agreed there would be no impacts on an SCR or significant industry change project.

TL noted that the Proposer had not identified any impact on consumers for this Modification. The Workgroup considered the Proposer's view and agreed there would be no consumer impacts as a result of IGT179.

TL noted that the Proposer had not identified a cross-Code impact as a result of IGT179. The Workgroup considered the Proposer's view and agreed there would be no cross-Code impacts.

TL noted that the Proposer had not identified any environmental impacts. The Workgroup considered the Proposer's view and agreed there would be no environmental impacts.

TL took the Workgroup through the Relevant Objectives and noted that the Proposer had identified a positive impact on (F) – Promotion of efficiency in the implementation and administration of the Code. They added that the Proposer's rationale set out that the Modification assists in providing clarity on a key review process within the IGT UNC. The Workgroup considered the Proposer's view and agreed there would be a positive impact on Relevant Objective (F).

Implementation

TL advised that the Proposer's recommended approach was to implement IGT179 as soon as possible. TL added that the Proposer wanted to provide clarity on the AQ review process quickly. TL advised that the next AQ review process will begin with the Independent Networks Association (INA) in May 2026, who produce the updated NExA tables every year before sending to the Code Administrator for Workgroup and Panel approval. TL noted that the Proposer had suggested that IGT179 could be implemented as part of the standard IGT UNC releases scheduled for November 2025 or February 2026. TL advised that the November 2025 release would not be possible, as the earliest date that the Panel could approve IGT179 would be 31st October, and there would be a standard 15 Working Day Appeal Window following this, meaning that the IGT UNC Release scheduled for 7th November would not be achievable. TL advised that the standard implementation

approach wording had been used in the Workgroup Report to indicate that the Modification should be implemented at the next available IGT UNC Release.

The Workgroup unanimously agreed with the proposed implementation approach, with an aim to implement IGT179 as part of the next available IGT UNC Release.

TL noted that the next available release, based on the current timetable, would be February 2026.

Governance

TL advised that the Proposer had indicated IGT179 should be treated as a Self-Governance Modification. TL advised that the Proposer's rationale was there are no proposed process changes or additional governance for IGT UNC parties, and the Modification is simply updating an ancillary document primarily used by the INA. The Workgroup unanimously agreed that IGT179 should be subject to Self-Governance.

AB noted that as Proposer, they had discussed IGT179 with the INA, so they are aware of the Modification.

Timeline

TL advised that should both the Workgroup and Panel agree to IGT179 going out for consultation, this consultation could be issued on Monday 29th September, one Working Day after the September IGT UNC Panel meeting. TL added that if the Panel agree to a standard consultation length of 15 Working Days, it will close for responses on Monday 20th October. TL advised that the Code Administrator would be able to finalise and publish the Final Modification Report by 24th October, the paper day for the October Panel meeting, and that the Panel could approve the Modification for implementation on 31st October, subject to a 15 Working Day appeal window afterwards.

Recommendation:

The Workgroup unanimously agreed that:

- This Self-Governance Modification should proceed to consultation.

STANDING ITEMS

7. Cross Code Modification Implications Tracker

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

Watch List

- [0913 - Amending referencing and naming errors in TPD section B and V](#). The Workgroup Report is due to be considered by UNC Panel in September 2025. The Code Administrator will review the legal drafting and confirm any impacts to IGT UNC. This is a housekeeping Modification amending some incorrect references in the mentioned sections.

- **0910 - Amendment to DSC T&Cs to include a requirement to provide data incident contact details**. The Workgroup Report is due to be considered by UNC Panel in September 2025. There is an impact on IGT UNC parties, but not the IGT UNC Code.
- **0909 - Refining the Class 2 Individual Valid Meter Reading Requirement Performance Measures**. The Workgroup Report for this Modification is now due to be presented to UNC Panel in September 2025. There is currently no legal text for this Modification. Therefore, the IGT UNC Code Administrator cannot confirm how this Modification may impact IGTs or the IGT UNC. However, based on the proposal form, there will likely be automatic application of changes to 5.17 of Section M. The Code Administrator will re-assess the impacts once Legal Text is available. KA added that legal text is expected to be published imminently ahead of the September Panel meeting.
- **0908 - Removal of DNO meter reading obligations resulting from non-provision of a Valid Meter Reading**. The IGT UNC Panel approved IGT177 under Self Governance. The Appeal Window for IGT177 will close on 19th September. If no appeals are received the Modification will be implemented on 26th September 2025. Once implemented, UNC 0908 will not pose a direct impact to IGT UNC Code as the must read provisions will sit within the IGT UNC.
- **0896 - Reducing the current Code Cut-Off Date (Line in the Sand) from 3 to 4 years to 2 to 3 years**. The Modification has been approved by the Authority and is awaiting implementation, with a planned date for 1st April 2026.
- **0890 - Update to AQ Correction Processes - Request for Adjustments (RFA) AQ Change**. The Modification has been approved by the Authority and is awaiting implementation, with no date confirmed yet.
- **0886 – Amend the Code Cut-off Date to a Rolling Three-Year Period**. The Modification has been approved by the Authority and is awaiting implementation, with a planned date for 1st April 2026.
- **0876 - Updates to the Annual Quantity (AQ) amendment process**. The Modification has been approved by the Authority and is awaiting implementation, with no date confirmed yet.

IGT UNC Equivalent Modifications

- **0887 – Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS**: The Modification has been approved by the Authority and is awaiting implementation, with no date confirmed yet. IGT176 was submitted to the Authority last week and is awaiting a decision.
- **0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers**: The Code Administrator are still waiting for a Sponsor to raise the equivalent Modification to UNC 0854. The Workgroup were reminded that earlier this year, they had agreed that an IGT UNC equivalent Modification was required, whilst the CDSP had also encouraged this. KA added that the CDSP would bring a statement on this to the October Workgroup meeting. It was agreed to add a separate AOB item for UNC 0854.

- [0843 - Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert](#). This Modification is currently with the Authority for a decision, along with IGT165.

Live Review Groups:

- [0879 – Review of current Supply Meter Point Classes \(Classes 1-4\)](#): It was noted that this review is due to report back to UNC Panel in October, barring an extension. IGT UNC parties were encouraged to look into this review, as a potential Modification(s) raised as a result of this review will be impactful. KA advised that the Final Workgroup Report would be completed in the Workgroup meeting scheduled for 12th September and encouraged IGT UNC parties to get involved whilst they still can.
- [0849 - Commercial Framework Review to Enable Hydrogen Blending](#). It was noted that this review is due to report back to UNC Panel in October, barring an extension. IGT UNC parties were encouraged to look into this review, as a potential Modification raised as a result of this review will be impactful.

8. IGT UNC Known Issues Register

TL 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 [published their decision on the preliminary strategic direction statement and governance arrangements for industry Codes](#) on 1st August. The next formal SDS is expected to follow the appointment of Code Managers in 2026.

Other upcoming publications in the Code Reform project is [a decision on the second implementation consultation](#) in Autumn 2025, and a [decision on the joint consultation with DESMZ Code Manager licence conditions](#) and a new Modification proposals consultation over the winter.

There was [a consultation open from Xoserve on preferred hypotheses for Project Trident and UK Link](#), which was closing for responses on 12th September. A workshop was held on 5th September.

AOB

10. Xoserve IX Services Update

TL advised that the Code Administrator had received a notice from Xoserve advising that they are moving to a cloud based IX service. TL added that this notice would hopefully provide information to IGT parties on the correct contacts at Xoserve to get in touch with if they have any concerns.

11. September 2025 Extraordinary Release

TL advised that there is an extraordinary release planned for 26th September to implement [IGT177 - Aligning IGT “must read” obligations within the IGT UNC](#), provided no appeals are received before the window closes on 19th September.

12. Ofgem Updates

TL advised that there is currently a [Request for Information open from Ofgem on the gas disconnections review](#). They added that this will be relevant to IGT parties and advised submitting a response before the deadline of 1st October.

The next Workgroup meeting is scheduled for Thursday 9th October 2025.

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Annex 1 – Actions Table

Reference	Action	Owner	Status
25/07 - 01	<i>Code Administrator to ask IGT UNC Panel if they wish to submit a response to Ofgem's Best Data Practice consultation following the Workgroup's recommendation.</i>	<i>Code Administrator</i>	<i>Closed</i>
25/09 - 01	Code Administrator to review the time required to implement changes to the IGT UNC website suggested by BUUK	Code Administrator	Open

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