

Final Modification Report	At what stage is this document in the process?
IGT165: Independent Shrinkage Expert and Independent Shrinkage Charge	01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification Report
Purpose of Modification: This enabling Modification seeks to align the IGT UNC with UNC Modification 0843. It will require that the IGT UNC places an obligation on IGT UNC Parties to: • Comply with the Independent Shrinkage Expert (ISE) as stipulated within the Independent Gas Transporter Arrangements Document (IGTAD); and • Not unreasonably withhold data where such data is requested by the ISE for use in the Independent Shrinkage Model Methodology (ISMM).	
	Panel considered this Modification on 29th August 2025. The Panel recommended by majority that this Authority Decision Modification should not be implemented.
	High Impact: Consumers
	Medium Impact: Independent Gas Transporters (IGTs)
	Low Impact: Shippers

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Any questions?

Contact:

Code Administrator



IGTUNC@talan.com



02070901044

Proposer:

David Morley



David.morley@ovo.com

Timeline

This Modification was first considered by the IGT UNC Workgroup in June 2023. In July 2023 the Modification was amended. Shortly after, the Modification was put on hold whilst the related UNC Modification (UNC0843) was further developed. In February 2025 the IGT UNC Workgroup revisited the Modification, and the timetable was adjusted as set out below.

Modification timetable:

Initial consideration by Workgroup	8 th June 2023
Workgroup Report presented to Panel	30 th May 2025
Draft Modification Report issued for consultation	20 th June 2025
Consultation Close-out for representations	11 th July 2025
Final Modification Report available for Panel	22 nd August 2025
Modification Panel decision	29 th August 2025
Modification issues to Authority	3 rd September 2025

1 Summary

What

It is currently estimated that gas lost from the system (i.e., Shrinkage) for IGTs is zero. The IGT UNC currently makes reference to the IGTAD for Shrinkage. The IGTAD does not currently set out arrangements for the identification or estimation of IGT Shrinkage or for its allocation among Connected System Exit Point (CSEP) Users. As a result, Shrinkage is estimated to be 0.

For gas year 23/24, the Allocation of Unidentified Gas Expert (AUGE) forecasted that 19 Gwhs of Unidentified Gas (UIG) was due to IGT Shrinkage. Allocating IGT Shrinkage to UIG rather than by applying a charge to Transporters means that Transporters are not incentivised to ensure that gas leaks from their pipeline system are controlled, damaging the environment. Furthermore, as UIG is a line item in the Price Cap, this has a direct impact on inflating customer bills.

Why

This change should be made to ensure that gas that is lost from the pipeline system is purchased by the party that owns the pipeline system.

How

[UNC Modification 0843 'Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert'](#) proposes the role of the ISE and the Independent Shrinkage Charge (ISC). This IGT Modification ensures that the ISE has jurisdiction over IGT UNC Parties.

2 Governance

Justification for normal procedures (Authority Determined)

This Modification should follow normal procedures and be considered by the Authority for decision. The Modification:

- (i) is likely to have a material effect on:
 - (aa) existing or future gas consumers; and
 - (bb) competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes; and
 - (cc) the operation of one or more pipe-line system(s); and
 - (dd) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
 - (ee) the uniform network code governance procedures or the network Code Modification procedures; and
- (ii) is unlikely to discriminate between different classes of parties to the uniform network code/relevant gas transporters, gas shippers or DN operators.

Initial Proposer requested next steps

The Proposer requested that the Modification should:

- be an Authority Determined Modification Proposal;
- be assessed by a Workgroup; and
- proceed to Consultation.

Workgroup discussions

March 2025

The Workgroup considered the progression path for this Modification following the development of the solution and legal drafting, and whether it still required an Authority decision.

The Code Administrator reminded the Workgroup of the rationale for an Authority decision, as noted above. They added that UNC0843 has also been progressed as an Authority Determined Modification Proposal.

The Proposer and the Workgroup agreed that this Modification should continue to be progressed as an Authority Determined Modification Proposal for the reasons above and to align with UNC0843.

Workgroup conclusions

May 2025

The Proposer and the Workgroup agreed that this Modification should continue to be progressed as an Authority Determined Modification Proposal for the reasons set out above and to align with UNC0843.

Initial Panel views

May 2025

The Panel considered the Workgroup's assessment of the Proposer's rationale and agreed unanimously that this Modification should continue to be progressed as an Authority Determined Modification Proposal.

Panel decision

August 2025

The Panel considered all consultation responses and agreed unanimously that this Modification should continue to be progressed as an Authority Determined Modification Proposal.

3 Why Change?

Correct ownership - Where the ISE and AUGE agree on Shrinkage volumes, this Modification would remove IGT Shrinkage from UIG, meaning that the party responsible for creating Shrinkage purchases gas to cover it.

Lowering bills - Removing IGT Shrinkage from UIG would have a knock-on impact on the [Price Cap](#), lowering customer bills.

Methane reduction - By allocating IGT Shrinkage to IGTs, this may also serve to incentivise IGTs to lower IGT Shrinkage. Shrinkage mainly consists of methane. Methane is widely accepted to be 84x more potent than CO₂ as a greenhouse gas. Methane reduction aligns with UK government's [Net Zero Strategy](#).

4 Code Specific Matters

Technical skillsets

Insight and understanding of Shrinkage may be useful. Including how it is managed in the UNC and IGT UNC and within the Transporters' regulatory and Licence framework.

Reference documents

[UNC0843 Modification Documentation](#)

[AUG Statement 2023/24](#)

5 Solution

Summary of solution

The solution and business rules for the ISE and the ISC are covered under UNC0843. In brief, the ISE will forecast the amount of gas that has not been included in the calculation of Shrinkage, and is not UIG, and apply that as a charge to be recouped by pipeline owners.

To enable the ISE to apply the ISC to IGTs:

BR1: The ISE, as established under UNC0843, will have jurisdiction over the IGT Pipelines and IGT UNC Parties. Detail on how IGT UNC Parties must comply with the ISE will be contained within the IGTAD, and IGT UNC will enable this to be applied to IGT UNC Parties by stipulating that the ISE will have jurisdiction over the IGT Pipelines and IGT UNC Parties.

BR2: IGT parties must reasonably comply with any data requests from the ISE.

Workgroup discussions

June 2023¹

The Proposer informed the Workgroup that the business rules for IGT165 are contained within UNC0843, and that this Modification should enable IGTs to have the charge applied to them. The proposal is that the ISE will have jurisdiction over the IGT's and their pipelines.

Inclusion of the Independent Shrinkage Expert in the IGTUNC

The Proposer asked the Workgroup if the ISE role needs to be included in IGT UNC Code to ensure that the ISE has jurisdiction over IGTs.

An IGT asked if this aspect of IGT165 is going into the UNC0843 proposal, to ensure that the ISE has authority over the Gas Distribution Networks (GDNs). The Proposer said that their proposal for the legal text is that UNC Transportation Principal Document (TPD) Section N is amended to state that GDNs will need to pay for the ISC and abide by the decisions of the ISE.

¹ Please note that when IGT165 was considered in June 2023, it was presented as a "mirror Modification" rather than an "enabling Modification". Therefore, the discussions on the Modification would have been within the context of a mirror Modification.

The IGT asked if this was a data obligation rather than a charge. The Proposer confirmed that it was both and it would be made explicit in UNC0843 that parties needed to comply with the data requests and the ISC, and that this would be mandatory. They added that IGTs and GDNs would purchase gas to cover the charges. The IGT advised that if these rules are contained in the UNC there will need to also be something in the IGT UNC.

The Proposer asked the Chair about changes to the IGT UNC. The Chair advised that the IGT165 solution design mechanism is missing but Shrinkage is currently covered in Code with the amount set as 0.

There was a further consideration amongst Workgroup about whether the current design needed to be unravelled in both the UNC and the IGT UNC, adding that there needs to be consideration of how the charges are applied as the IGT UNC does not cover a gas input mechanism. So, this would be completely new in the IGT UNC as all issues of gas input sit within the UNC. It was also noted that the IGTAD states how Shrinkage is dealt with under the UNC and how the IGTs should approach Shrinkage.

The Proposer advised that the charge under UNC0843 would be a new charge. The Chair asked if this was a charge to pay, or would it be new gas going into the network as the IGT UNC cannot force this on IGTs. The Proposer asked if this required new legal text. The Chair said that there is no precedent for legal text of this nature. They added that this would be an unsubstantiated line of text with instructions, but without any legal grounding.

Use of Gemini²

The Proposer asked the Central Data Service Provider (CDSP) how they should go about getting new parties include in Gemini and whether there would be any potential complications.

A representative from the CDSP said that they cannot give a firm answer on how to add new parties to the Gemini system at this time, but a Rough Order of Magnitude (ROM) will be conducted for this Modification. IGT UNC will not outline how new parties will be added to Gemini as this is part of the system solution rather than Code. In the UNC Modification, GDNs can simply purchase the gas. The Chair suggested that they could add a line in the IGT UNC, however, the lack of any solution could require IGTs to raise a new UNC Modification.

The Chair added that the IGTs do not use the Gemini platform, and that this could lead to further issues and asked if the payment process could simply be added into the UNC. The Proposer responded that they would need to look more closely at the governance arrangements. The CDSP asked the Proposer if the Gemini element of the Modification is more for the design section since it has no current basis in IGT UNC. Since IGT Shrinkage is set at 0, there would need to be new legal text.

The Proposer was asked to clarify if they want IGTs to put gas into the network or pay a charge. The Proposer said IGTs would recover the charge by purchasing gas. The Chair asked what the likely order of the charge would be, and the Proposer suggested that the 19GWh figure quoted in the Modification is equivalent to approximately £800,000 of gas. The Chair asked if the ISE would determine which IGTs and GDNs would be liable to pay this via Gemini. The CDSP explained that GDNs access Gemini and the levels of Shrinkage in kWh terms. Once the figures are agreed, they send the daily values to the CDSP, which are then entered into Gemini. The Shrinkage quantity is assigned to the GDNs on a daily basis.

² Please note that when the Workgroup re-considered previous points of discussion for Modification at its March 2025 Workgroup Meeting, the CDSP noted that some points noted regarding Gemini may be outdated. Please see the Workgroups Discussions from March 2025 within this document.

GDNs will have contracts with Shippers who will move that gas for them. The Chair added that it was important to determine if that was the appropriate mechanism for IGT165.

The Proposer agreed that the process described by the CDSP was the right one. The Proposer was asked whether the IGT UNC should be amended rather than the UNC. They reiterated that the IGT UNC is a site-specific Code and that gas input is a matter for the UNC. The CDSP asked if this might be more appropriate in the IGTAD. The Chair suggested that a UNC amendment could mention that the IGTAD be updated.

The Chair explained that a mirror Modification is a mirror image of the changes, which would require an IGT UNC ISE and an IGT UNC ISC. However, The Proposer had stated that they would like the UNC ISE and UNC ISC to cover the IGTs.

Considerations of UIG

The Chair advised the Workgroup that UIG is not a concept contained within the IGT UNC. They added that while they understand the intention of the Modification, they believe that it is still missing clarity around the solution. They confirmed that the IGTAD is a UNC document and any changes to the document can be made via the UNC.

The Workgroup were advised that IGTs have a governance route in the IGT UNC to ensure that Shippers do what the GDNs are requiring of the IGTs under the IGTAD. Under the IGT UNC, Parties would be fulfilling any data requests or other requirements that the ISE might want. The Shrinkage calculation, which is controlled under the UNC, would be applied to the IGTs via the UNC. The Proposer asked if they could amend the IGT UNC to obtain jurisdiction and to comply with data requests, adding that they would redraft this part of the Modification. The Chair asked if UNC considerations for IGTs are considered under UNC0843 which will facilitate the governance of the ISE under the UNC. If this was the case IGT165 would need to ensure that the Parties do not hinder the mechanisms in the UNC described and governed in the UNC.

The Workgroup were invited to add any further questions and an IGT confirmed that they believe that the approach makes sense, and that the bulk of change will be within the UNC. A Shipper asked about the difference between paying a charge and buying gas. The Proposer said that they wanted to follow the UIG Shrinkage Model. Both agreed that further conversation on this will be followed through in the IGTAD.

The Chair confirmed that IGT representation might still be missing from UNC0843 and that if IGTs are to be included in the Modification, they should join the UNC Modification discussions. The CDSP confirmed that in a similar way to the Allocation of Unidentified Gas Expert (AUGE), they should have the ability to add their own expertise. They noted that they need to be sure of the different outputs required of the ISE. This will be put together as a framework under the UNC and would be a good place to consider the high-level discussion. The Proposer agreed with this and suggested that there are no restrictions on how the ISE should look at the data, since it is an independent expert.

The Proposer was asked if both the AUGE and the ISE will each provide an opinion on Shrinkage. The Proposer advised that they would each look at the figures and that the experts would be aware of their different roles. The Chair asked what would happen if the AUGE and the ISE provide different figures for Shrinkage. It was suggested that any gas which is not regarded as Shrinkage will go into UIG.

The Workgroup considered whether the ISE could override the AUGE, and it was confirmed that it cannot override the AUGE. UIG is allocated according to the AUGE, and the ISC will be determined by the ISE and paid for at LDZ level. The CDSP confirmed that the AUGE determines the amount of Shrinkage. The Proposer added that the AUGE will add weightings to different categories of missing gas with some customers paying more UIG due to the weighting. The CDSP responded noting that the AUGE does not

have specific Shrinkage experts, and they do not see their role changing with the introduction of this new Modification.

The Chair clarified that the actual Shrinkage would have already been removed from settlement before the AUGÉ looks at it, but the ISE would look at Shrinkage in its entirety. The CDSP added that with the ISE figure and the AUGÉ figure, GDNs will verify based on the output. The Proposer advised that two figures would be put forward:

- the LDZ Shrinkage quantities which are forecast according to the SLM; and
- a Shrinkage value created by the ISE.

When a difference between the two values is positive, that will be applied as the ISC. Before the UIG is applied to Shippers, ISC and LDZ Shrinkage quantities are removed from any gas inputted into the LDZ and then applied as UIG.

The Chair informed the Workgroup that under the current arrangements, the GDNs pay for all the Shrinkage on the network. They have determined that the IGT contribution is zero at the moment. The Proposer advised that the national leakage test for IGTs is set at zero because the pipes are made of Polyethylene (PE). They noted that that the figure can be changed, but this is outside of the responsibilities of the ISE and the Modification.

The Chair clarified that this creates two types of governance for Shrinkage. The Proposer is looking at introducing a third that “levels up” without disturbing the Transporter’s Licence Conditions (and after UIG and Shrinkage). An IGT asked if the GDNs are already paying for the Shrinkage and whether the issue is that they are not paying for an accurate amount. It was confirmed that this was the case and in the UIG space, there is about 3TWh of non-attributed gas. It was added that the ISE will take away any bias that an industry party would have and seek to find the most accurate figures and allocate the charges.

The CDSP questioned how the ISE would have jurisdiction over the IGTs and asked for confirmation that there would still need to be an IGT UNC Modification to do this and if it needed to be a mirror Modification. The Chair replied that a mirror Modification of UNC0843 would produce a ‘mirror’ ISE. Under the UNC, the ISE will be appointed and responsible for IGT pipelines. Under the IGT UNC, this expert will include the IGT sites and transportation of gas to those sites in its calculations. The Proposer confirmed that this is not happening at site level and a question was raised about whether site level data was needed.

The Workgroup were reminded of the current arrangements and that there is a Shrinkage section in the IGT UNC, but it indicates that the amount is set to zero. If this was shifted away from zero, the IGT UNC text would likely need to be amended. The Proposer confirmed that the zero would remain and the new calculation would be zero plus the ISC. The Chair questioned whether IGTs could potentially be charged twice, both through the ISE and the existing mechanism by GDNs. The Proposer said that the ISE would subtract when appropriate and that the amount would be deducted from the amount forecasted by the ISE. If that number increases, the ISE forecast becomes lower.

The Proposer asked whether there was a precedent for IGTs and GDNs paying for a similar role as the ISE, adding that the payment for the ISE might require an amendment to the IGT UNC. An IGT mentioned that the CDSP is the only jointly funded organisation. The CDSP confirmed that the AUGÉ is funded by Shippers, and it is not captured in the UNC or IGT UNC and that this funding happens via the Data Services Contract (DSC) change space, rather than the UNC.

The Proposer noted that costs would be established for IGTs as approximately 1/25th of the total GDN cost, as a relative market share. The CDSP asked to confirm that National Gas Transmission (NGT) would be excluded from this calculation. The Proposer confirmed that they would be excluded because

they already manage these costs through the RIIO (Revenue = Incentives + Innovation + Outputs)³ pricing measure.

July 2023⁴

The Proposer provided an update to the Workgroup and advised that they had amended the Modification Proposal to reflect that IGT165 was intended to enable the intent of UNC0843 within the IGT UNC, rather than mirror the requirements between the two Codes. This resulted in a simplified solution for IGT165 which would cover:

- Jurisdiction of the ISE and the ISC over the IGTs; and
- Data request compliance from IGTs.

The Workgroup considered the update and determined that there were outstanding questions with respect to the detail of UNC0843 which prevented a thorough assessment on the impacts on IGT UNC parties.

Costs to parties

An IGT queried whether IGT parties would be asked to fund the ISE. The Proposer informed the Workgroup that costs were looked at in the UNC0843 Workgroup. Currently, it is expected that the costs would be covered by Shippers; however, this was yet to be confirmed. They added that the final determination on funding would be included in the relevant XRN, rather than the UNC and IGT UNC Modifications.

IGTs purchasing gas

There was significant discussion with respect to the proposed mechanisms whereby IGTs would purchase gas, including the proposed use of the Gemini system which would be developed to facilitate the additional use case. Additionally, there were questions with respect to the methodology for attributing gas volumes between IGTs. The Proposer reiterated that the solution mechanics would be detailed within UNC0843 and in some areas would be defined by the ISE following its appointment.

The Chair asked if this would be challenging to move IGT165 ahead without further clarity of the business rules and methodologies associated with UNC0843. Whilst the solution of IGT165 was now relatively simple, the impacts were difficult to assess until UNC0843 had been further developed. The Workgroup and the Proposer agreed that at least one additional meeting of the Workgroup should be held to consider further development of the UNC0843 solution and its impacts on IGT165. In support of that the Proposer agreed to provide an illustration of example calculations in accordance with the provisional methodologies, and the CDSP agreed to seek further relevant information with respect to procurement of the ISE which could support an impact assessment of IGT165.

³ [Energy network price controls | Ofgem](#)

⁴ Please note that when IGT165 was amended ahead of the July 2023 meeting. The Modification was presented as an “enabling Modification” rather than a “mirror Modification”. The Workgroup discussions from this point forward were within the context of an enabling Modification.

August 2023

IGTs purchasing gas & charges

The Proposer provided an update on UNC0843 and presented a [slide](#) to the Workgroup setting out how the payment process was expected to work.

An IGT asked how IGTs would engage with the Shipper as part of this process. The Proposer said that they were drafting the legal text for UNC0843, and they would provide an answer to the Pipeline User and Pipeline Operator relationship. The CDSP added that they have drafted the XRN which includes both Modifications. They mentioned that they would share the ROM response with the Workgroup once it was available.

A Workgroup member asked about the additional requirements for Shippers as IGTs work at all levels of the LDZ. The Proposer said that charges would need to happen for each individual LDZ as they would have different Shippers.

An IGT asked to clarify if two charges were being applied to pay for Shrinkage and the ISE. The Proposer advised that the costs of running the ISE would be handled separately. The CDSP reminded the Workgroup that GDNs cannot purchase gas for IGTs. The Proposer asked if there had been any enquiries about Licence changes in this area. The Proposer said that they had identified a change to allow GDNs to purchase gas to cover the ISC. They added that the Authority had been informed of the need for this change if UNC0843 were to be approved. They clarified the difference between Shrinkage, UIG and the ISC noting that all three of these would account for missing gas.

The Proposer was asked where the “Independent Shrinkage” would come from and where the gas was being lost from to account for the ISC. The Proposer said that it would come out of UIG and that the amount was calculated through the Shrinkage model error, which would be charged back to GDNs and IGTs. This charge would shrink the UIG, and the UNC ISE would have jurisdiction over the IGTs and the sites. The Chair asked how an IGT could be compelled to purchase gas to be put into the Network, and if this would be a matter under the UNC. The Proposer said that this would be included in the IGTAD. The Chair added that there was no visibility for compliance from the IGTs, and any shortage of gas would have to be noticed under the UNC, rather than the IGT UNC.

IGTs were invited to attend the UNC0843 Workgroup to have any questions answered. The Proposer reminded the Workgroup of an action by the UNC0843 Workgroup to collect feedback from IGTs at the IGT UNC Workstream meeting. The Chair said that the most important question was how the governance of the ISE and the ISC should be structured between the UNC and the IGT UNC. They added that the solution for IGT165 would need further development in conjunction with UNC0843. The Chair reminded the Workgroup that as IGTs are party to the UNC, they would need to follow the developments of UNC0843 as well.

ROM

The CDSP advised the Workgroup that they have drafted the related XRN which includes both the UNC and IGT UNC Modifications.

October 2023

Charges

The Proposer reminded Workgroup Members of the purpose of IGT165. They advised that IGTs may operate in several LDZs and where this was the case, the IGT may be required to cover several IGTs ISCs which would be recouped at the LDZ level.

The Proposer confirmed that Licence changes for IGTs may need to be considered by the Authority. A member advised that there was a fundamental difference between IGTs and GDNs, therefore, Licence changes would be required. The Proposer provided members with an overview of the changes that they had made to the business rules in UNC0843 since the last meeting which read as follows:

“If the GDN ISC and IGT ISC are approved by the Authority, Transporters and IGTs will be obliged to purchase volumes of gas to cover the respective ISCs via the Independent Shrinkage Charge Provider: The Transporter will fulfil the role of Independent Shrinkage Charge Provider or contract with a Shipper to fulfil the role. The mechanism to purchase gas for LDZ Shrinkage will be mirrored for purchasing ISC: for the avoidance of doubt, this is detailed in UNC’s Transportation Principle Document, Section N, paragraph 4. For the avoidance of doubt, the ISE, within the ISS, will divide the Yearly GDN ISC into Daily GDN ISC (365 equal parts), and will divide the Yearly IGT ISC into Daily IGT ISC (365 equal parts). CDSP will load the Daily ISC amounts into Gemini and GDNs and IGTs will contract with a Shipper(s) to the Independent Shrinkage Charge Provider will purchase the respective ISCs. NB: for ease of implementation for the CDSP, the GDN ISC could be added to LDZ Shrinkage prior to loading into Gemini and could be considered under the XRN and not under 0843. IGTs will purchase gas within the LDZ that their network resides, therefore minimising the impact to Gemini which currently works at LDZ level. I.e., Gemini will not be required to operate at a level less granular than LDZ level due to 0843.”

Members discussed the updated business rules. The CDSP asked if there would be a change to UNC Section N and if the IGT UNC would link across or would the changes need to be included within IGT165.

An IGT queried the benefit of creating an ISE to do work that is already done in Industry. The Proposer advised Members that the role of the ISE was to reduce model error and ensure parties with leakage were the parties that paid for said leakage.

December 2023

Independent Shrinkage Provider (ISP) & ISE

The Proposer informed the Workgroup of a key change in the role of the ISP under UNC0843. They added that this would be a Shipper purchasing Shrinkage gas on behalf of a DNO. They mentioned that a DNO or an IGT could fill this role as well and recommended that the Shrinkage Provider discussion should occur under the UNC.

An IGT asked if they could envisage multiple ISPs. The Proposer confirmed that there could be multiple ISPs, but there would only be one ISE. They reiterated that in an ISP use case, an IGT would be recommended to use a Shipper as their ISP.

Rough Order of Magnitude⁵

The CDSP presented the ROM for UNC0843 and IGT165. They added that this was only the second ROM request performed by the CDSP specifically for an IGT UNC Modification. The Proposer asked if costs were provided for the procurement of the ISE. The CDSP responded that costs for procurements have not been provided in any of the ROMs for UNC0843 and IGT165. They added that the CDSP could only know the costs once the procurement stage has started, which would only occur after an approval of the Modifications.

An IGT asked if the ISE procurement would go to a committee to establish the nominations and costs associated. The CDSP confirmed that in past instances, a stakeholder evaluation panel was created to facilitate the procurement process. They added that UNC0843 was drafted to follow this path, where the panel members would have a view of the initial procurement while the wider industry would not.

Another IGT asked at what point the IGTs would get an understanding for the costs associated with the ISE. The CDSP responded that they would not begin the procurement process until the Modification has been approved. The IGT queried if there could be cost saving from removing the AUGE role. The Proposer responded that the AUGE would remain as is. The IGT additionally queried about the possibility of ISE procurement at the consultation stage. The CDSP responded that under these circumstances the approach would be to wait for a final decision on the Modifications before beginning a procurement process. They added that they could not currently provide a view on procurement costs and the Modification contained detail on the funding of the new role which would be split between DNs and IGTs.

The Chair asked the CDSP if Gemini would distinguish between existing Shrinkage and the new Shrinkage. The CDSP advised that DNs would still provide Shrinkage values and the ISC figure would be added on top of the existing bills. The Chair asked about the relationship with the previous year's Shrinkage. The CDSP mentioned that it will be forward looking, and that a reconciliation adjustment process would look back on the figures.

A query was raised about instances where the ISC is negative. The CDSP responded that in this case the GDNs would still need to purchase gas to cover their LDZ Shrinkage Quantities (not the ISC). The Proposer added that traditional Shrinkage could be amended with the new ISE information.

An IGT queried about a case of two IGTs within an LDZ, where the figures might not equal the actual distribution of Shrinkage. The Proposer responded that the split would be calculated exactly for each IGT, and no assumptions would be made.

An IGT added that in order for the calculation to be accurate, the ISC would need to be calculated at the granular level. They asked if it was not their understanding that the ISC would have to distinguish Shrinkage between multiple IGTs on a single LDZ. The Proposer responded that this would be the purpose of the ISC. The CDSP added that the methodology was at the discretion of the service provider, and that it was difficult to foresee how the calculation arrangements would be carried out. The IGT mentioned that there seemed to be a risk where the ISC would not distinguish amounts on a single LDZ. The Proposer added that this was the same risk within the AUGE and queried if the ISE would need a role code to send an ORD file on the IX. This type of communication via the IX would be necessary when establishing the ISC.

⁵ Please see the Impacts section of this document up to date information on the UNC0843 ROM. Please note that these discussions were regarding a previous version of the ROM.

An IGT queried about the role of the Authority within the ISE. The Proposer clarified that the Authority would decide on the current Shrinkage figures at the beginning of April every year. The CDSP added that under UNC0843, the Authority would approve the ISE values in addition to Shrinkage⁶. The IGT queried if the balance of Shrinkage was set out within the Modification to show the savings involved in this process. The Proposer explained that within the UNC0843 Proposal there was detail regarding this. They noted that about £800,000 was being paid by Shippers every year.

The Chair queried about the governance of the ROM and the costs that would be incurred by IGTs, from the point of view of the Code. The CDSP responded that this was a combined ROM for the UNC and IGT UNC and added that the DSC would account for how costs were to be recovered, and that this would not pass through the UNC and IGT UNC. The Proposer added that the costs that the IGTs bear would be within UNC0843, not IGT165. A Shipper added that it would be useful to have the same communication going to both groups.

January 2024

UNC Modification extension & next steps

The Proposer confirmed the current development stage of UNC0843 had been extended to April 2024.

The Chair confirmed with the Proposer that the IGT UNC Modification was to adopt the UNC ISE and ISC regime from the UNC Modification and ensure that data was provided when necessary and IGTs, where necessary, would return gas to the network under UNC governance.

The Proposer informed the Workgroup of the next steps for the UNC0843 Workgroup and that they had requested that SGN provide legal text. They added that the only area that was missing detail was regarding the ISP. The ROM would also be discussed at the next UNC Workgroup.

ISC

An IGT queried how the Shrinkage Charge would be determined for IGTs within the same LDZ. The Proposer responded that it would be performed at the CSEP level for each LDZ. The CDSP queried if any of the detail needed to be added to the IGT UNC Modification. The Proposer responded that this was expected to be in the IGTAD.

The Chair added that this might be a question for SGN as the provider of the legal drafting. An IGT queried if the IGTAD decision was a recent development. The CDSP provided the relevant paragraph from the UNC0843 / IGT165 ROM. There were no further comments.

February 2024

UNC legal text

The Proposer advised the Workgroup that they have had discussions with SGN, the provider of the legal text for UNC0843 and advised that some of the business rules have been moved around and will become further solution notes rather than becoming part of the legal text.

⁶ Please note that the business rules in UNC0843 have been updated to state that the Authority have the right to disapprove by the date in the Framework, but if no disapproval is received, then the Authority will have been deemed to approve.

SGN is currently in discussions with their legal team over the latest drafting of the legal text. The Proposer has shared this version with the CDSP and the Joint Office and added he is happy to share this with any in the Workgroup that are interested in reviewing the document ahead of the next Workgroup meeting.

The Chair asked for an update on when the UNC legal drafting was due. The Proposer responded that it is expected to be requested at the UNC Modification Panel on Thursday 15th February. The Chair asked if they had seen any of the legal drafting for UNC0843. The Proposer responded that the drafting had not been started yet, but they had had conversations with David Mitchell over some of the business rules. They added that the next Workgroup for UNC0843 will be at the Distribution Workgroup on Thursday 22nd February. The Chair encouraged those with an interest in the Modification to attend the next UNC Workgroup.

March 2024

IGT65 progression & ROM

The Workgroup were informed that the Proposer had indicated that there was no further work to be done on IGT165 at this point and that further discussions would be taking place at the UNC0843 Workgroup meetings. They added that the Proposer was waiting on the UNC legal drafting.

An IGT queried if a new ROM would be available. The CDSP informed the Workgroup that a ROM had been requested by the CDSP and would be available at the following IGT UNC Workstream meeting. The CDSP added that the ROM would need to be changed as the Proposer had changed the Modification from approval to disapproval by the Authority. They added that it was not expected to change the parts of the ROM relating to Gemini and IGTs.

The Chair mentioned that they understood that Gemini changes would be made under UNC governance, not under the IGT UNC. The Workgroup agreed that this ROM should be covered at the April 2024 IGT UNC Workstream. The IGT mentioned that UNC0843 would be covered under a separate Workgroup at the UNC.

February 2025

IGT165 legal text

The Code Administrator provided an overview of the Modification to the Workgroup and reminded the members that IGT165 is seeking to introduce provisions related to Shrinkage model error, the ISE and an ISC into the IGT UNC, and any other provisions to support UNC0843.

The Code Administrator advised that there are two business rules under the IGT165 solution, the first being to ensure the ISE has jurisdiction within the IGT UNC and the second around the provision of IGT Supply Point level data.

The Code Administrator took the Workgroup through the approach to the legal drafting ([v1.0](#)), advising that there were two main elements around Shrinkage model error. The first element was a catch-all clause that ensures that no provisions in the IGT UNC can get in the way of any IGT UNC party complying with the provisions in the UNC with regards to the ISE and the ISC related provisions.

The Code Administrator felt that this catch-all was all that was needed to ensure that the ISE had the required jurisdiction. This is because IGTs are parties to the UNC and regardless of this Modification, they will be required to comply with the provisions on them as parties to that Code. The IGT UNC cannot

stipulate what happens in the UNC, but it can make sure its provisions do not keep an IGT UNC party from complying with their UNC obligations.

The second element was a specific carve out to ensure that that IGT Supply Point level data was provided as per the UNC provisions. The Code Administrator believes that this is appropriate as IGT Supply Point level data is under the remit of the IGT UNC and not the UNC. They added that the text used for this section was largely the same as the provision of data text in the UNC Modification, with some terms and references updated to ensure it fits within the IGT UNC. They added that as part of the legal drafting, a new section FI had been created to pull existing Shrinkage provisions into the same section as ISE related provisions. The Code Administrator felt that this would ensure all Shrinkage provisions were in one place in the Code. They added that nothing had changed apart from some cross references within the existing sections as the numbering will have changed. They added that there were no other references in Code to these paragraphs so there were no knock-on impacts.

The Code Administrator also advised that some new terms had been defined to align with the terms in the drafting. An IGT asked if paragraph 4.1(c) of the IGT UNC drafting includes obligations that are either not relevant to the ISE, or to IGTs and Shippers on IGT networks, as it refers to TPD Section N 5 in the whole.

The Code Administrator showed TPD Section N Paragraph 5 to the Workgroup and confirmed that the entire paragraph is referenced and therefore it includes all relevant provisions. They added that there are some obligations within the paragraph that are not relevant to IGTs (e.g. the GDN Charges and GDN definitions). However, like other areas of the IGT UNC, the Code Administrator felt it was more efficient to reference the entire section as matters relating to just GDNs will not be applicable to IGTs regardless of them being referenced or not. Furthermore, it allows for some future proofing should amendments be required to this section as amendments to the IGT UNC would not be required every time you amend the paragraph.

The Proposer noted the three new definitions within Paragraph 4.1 but suggested that “Shrinkage Model Error” and “Independent Shrinkage Document” should also be defined as they are directly referenced in Paragraph 5.1 and 5.2. The Code Administrator responded that they would add those definitions into the legal drafting. The Proposer added that “Shrinkage Model Error” is also not defined in the UNC0843 legal text. They suggested that the clause including “Shrinkage Model Error” could be removed as the purpose is already captured by the rest of Paragraph 4.1. An IGT asked if the three new definitions under Paragraph 4.1 could explicitly refer back to TPD Section N of the UNC. The Code Administrator agreed to include this. The IGT asked if a definition of “Independent Shrinkage Charge” needs to be included within the IGT165 legal drafting. The Code Administrator responded that the charging falls under UNC governance and the paragraph on compliance with TPD Section N Paragraph 5 should encompass this.

UNC0843 and IGT165 next steps

The CDSP informed the Workgroup that a refreshed version of the ROM for UNC0843 would be available shortly and would be provided for the next UNC Workgroup meeting. The Code Administrator responded that there are two further Workgroups planned, with the aim of finishing the Workgroup Report at that Workgroup before it proceeds back to Panel and out for consultation.

The Chair noted that Ofgem would probably like to have UNC0843 and IGT165 aligned closely in terms of development completion dates ahead of the Authority decision on both Modifications. The Code Administrator suggested that the next steps for IGT165 should be to complete, and the Workgroup Report available, for the March Workgroup meeting, which should provide all parties the opportunity to look through the legal drafting for both UNC0843 and IGT165. The Code Administrator added that they will pre-draft the Workgroup Report with the conversations from previous Workgroup meetings included, with

the aim of publishing one or two weeks prior to the March Workgroup. They suggested that IGT165 may be able to be issued for consultation close to UNC0843, though there won't be a full overlap due to the different Panel meeting dates.

March 2025

Legal text

The Code Administrator took the Workgroup through the updated legal text, highlighting changes made following discussions at the February 2025 meeting.

The Workgroup highlighted a couple of other further minor amendments as follows, which the Code Administrator confirmed would be made ahead of the April 2025 Workgroup meeting:

- Removing remaining references to Shrinkage model error; and
- Correcting an error in the existing Shrinkage text that is being moved into the new Part FI.

The CDSP asked whether the definition of ISC needed adding. The Code Administrator confirmed that this was not necessary as the “catch all” part of the Legal Text ensures that nothing in the IGT UNC could get in the way of any IGT UNC party complying with what was required of them under the UNC. The ISC sits within the UNC and therefore the governance of this charge sits outside of the IGT UNC. The IGT UNC cannot dictate what happens in the UNC, but it can ensure that nothing within the IGT UNC can interfere with these UNC provisions.

No other changes to the legal text were suggested by the Workgroup.

Business Rule 1

The Proposer referred to Business Rule 1 as set out in the Solution section of this document. They noted that it refers to IGTAD but not the UNC. They questioned if the business rule needed to be amended to add in a reference to the UNC.

The Chair advised that they did not think this was required. They added that the UNC changes will apply regardless of what is referenced in the business rule under this Modification. IGTs and Shippers are required to be compliant with anything under that Code. Amending the Modification to refer to what parties are already having to comply with might cause a dual governance issue.

The Proposer agreed that no further changes were needed to the business rule.

Licence changes

An IGT referred to previous Workgroup discussions regarding potential Licence changes associated with the UNC and IGT UNC Modifications. They asked where the discussions were regarding these Licence changes.

The Proposer advised that there will be Licence changes needed to enable an IGT to purchase gas and the discussions around this have been captured under the UNC Modification. UNC0843 notes that the Authority will need to consider any necessary Licence changes as part of its consideration of the Modification.

The IGT responded noting that it was their understanding that for both Modifications to be implemented, the Licence changes would need to have been made first. The Proposer acknowledged this and confirmed that this would be something that Ofgem would need to consider. The Chair confirmed that this was correct, noting that the timetable once Modifications have been submitted to Ofgem are within their

gift. They added that if Ofgem choose to issue a consultation on the Modifications and/or the Licence changes it might become clearer to industry what they are considering.

The CDSP added that, due to their approval process, the Authority cannot approve a Modification that requires Licence changes as the Licence will not be in line with what is required in the Modification. The Proposer agreed with this view and advised that they have had sessions with Ofgem and that they understand the UNC Modification and necessary Licence changes. They have also been to UNC Workgroup meetings.

ROM

The CDSP noted that some of the information within the ROM dated 19th February 2025 had been put into the Workgroup Report. They advised that they had just submitted an updated version of the ROM to the Joint Office and advised that some of the information in this report may need to be updated. The Code Administrator thanked the CDSP for this information and confirmed that they will review the updated ROM and reflect any necessary changes in the next version of the Workgroup Report. They also advised that they will include a footnote in the Workgroup Report where needed to highlight that the ROM information in prior discussions might be out of date and to direct the reader to the impacts section and implementation section.

Initial assessment of impacts and costs

The Workgroup initial assessment of impacts and costs can be found in Section 6 of this document.

Initial views on implementation

The Workgroup initial views on implementation can be found in Section 8 of this document.

Workgroup conclusions (April 2025)

The Workgroup considered the history of IGT165 and previous Workgroup discussions surrounding the solution, with the aim of drawing conclusions and final views, which are set out below.

Business Rule 1

The Workgroup considered Business Rule 1 and previous discussions on the ISE having jurisdiction over IGTs and their networks to the extent of the relevant text as set out within the UNC0843.

The Workgroup noted that when the Modification was first raised, it was a mirror Modification rather than an enabling Modification. They also noted that when the Modification was first considered (June 2023) it was agreed that a mirror Modification was not required as it would create a dual governance issue.

The Workgroup considered the current scope of the solution and the catch-all provisions in the legal text. It was noted that IGTs are party to both Codes and will be required to comply with both the UNC and IGT UNC provisions. It was also noted that as the framework for the ISE sits within the UNC, the ISE will have jurisdiction over UNC parties under UNC governance.

The Workgroup considered if the catch-all clause was enough, or more was needed to ensure jurisdiction under the framework and under the IGT UNC. Code Administration reminded the Workgroup that IGT165 is looking to enable just the elements needed under the IGT UNC to allow for UNC0843 to be implemented.

The Proposer also reiterated the scope of the Modification, noting that they believe business rules in their current form ensure full jurisdiction under the framework and the IGT UNC. They added that there has not been any scope creep and so they are happy with the approach to the legal drafting and that there is nothing more needed.

The Workgroup agreed with the Proposer that the catch-all clause for Business Rule 1 was all that was needed and also agree that the legal text delivered the intent of Business Rule 1, ensuring full jurisdiction and that no further work was required with regards to this business rule.

Business Rule 2

The Workgroup considered Business Rule 2 and the legal text, which would ensure that IGT Supply Point level data could be provided when needed to the ISE. It was noted that consideration had been given previously to what level of data the ISE might need, and it was confirmed by the Proposer that the level of data is not specified within UNC0843 and that this was to ensure that the ISE can request the level of data that they deem to be necessary. The Workgroup also noted that as the level of data required by the ISE is not known and therefore changes are needed to the IGT UNC to allow for the provision of Supply Point level data should it be needed.

An IGT referred to existing IGT UNC provisions related to the provision of data to the Authority and wondered if there could be a conflict should there be an instance where there is a request by the Authority that conflicts with information parties are providing to the ISE. They added that once this Modification is implemented, if any conflict does arise, the IGTs will have to provide any requested to regardless. However, they suggested that an Urgent Modification could be raised to resolve future conflicts.

The Chair asked the Proposer about whether there is an appeals process under UNC0843. The Proposer confirmed that there was, but it was removed⁷ as there is a standard appeals process already.

The Workgroup noted the discussions and recognised that in the event of a conflict between an Authority data request and an ISE data request, an Urgent Modification may be needed to address it. The Proposer added that they were happy that the legal text approach will allow for the provision of data and that it does not go beyond that which is not required.

The Workgroup agreed with the Proposer that the legal text delivered the intent of Business Rule 2 and that no further work was required with regards to the business rule.

Interaction with UIG

The Workgroup considered previous discussions on the UIG. They noted:

- the calculation of Shrinkage is controlled and applied under the UNC, and it is currently set to zero for IGTs;
- the AUGE and the ISE will each provide an opinion on Shrinkage, and they will each be aware of the others role but cannot override each other;
- UIG will continue to be allocated according to the AUGE; and
- The ISE will determine model error by subtracting IGT Shrinkage from Independent IGT Shrinkage Quantities (IISQ) and where there is a difference, this value will either be returned to IGTs or an IGT ISC will be levied which would Shrinkage UIG.

The Proposer acknowledged the conversations during the development of the Modification and initial concerns around how the UNC0843 Modification would work and reminded the Workgroup that this sits outside the scope of the IGT UNC entirely.

⁷ Removal of the appeals process was discussed at the [August 2023 UNC0843 Workgroup meeting](#).

The Workgroup, having considered the previous discussion, agreed with the Proposer's view and that previous discussion on UIG sit outside the scope of IGT165 and no further work is required with regards the matter.

Purchasing gas via Gemini

The Workgroup considered previous discussions on the purchasing of gas via Gemini. The Workgroup noted that UNC0843 would introduce a mechanism whereby IGTs would purchase gas via Gemini and that this mechanism would fall under UNC governance should UNC0843 be implemented.

The Workgroup noted previous questions about how the IGT/Shipper relationship would work as part of this process and agreed that the detail regarding this relationship sits within UNC0843.

The Workgroup agreed that the purchasing of gas via Gemini sits outside the remit of this Modification and that no further work is required on this matter.

Licence changes

The Workgroup considered previous discussions regarding required Licence changes associated with IGTs purchasing gas for the purposes of UNC0843. The Workgroup agreed that Licence changes will be needed to enable an IGT to purchase gas. It was noted that the need for the changes has been acknowledged in both the UNC and the IGT UNC Modification documents.

The Workgroup had no further comments on this and agreed that the Authority will need to consider any necessary Licence changes as part of its assessment of both UNC0843 and IGT165.

Costs to IGTs

The Proposer and an IGT Workgroup member highlighted discussions at the UNC0843 Workgroup meeting on 9th April 2025 regarding costs associated with the implementation of the UNC Modification, with some discussion regarding whether it would be recovered by Shippers only or IGTs and Shippers.

The Code Administrator advised that the recovery of costs discussion was associated with work required by Xoserve to implement the Modifications, as set out in their latest ROM. The conclusion of those discussions acknowledged that IGTs and Shippers will be impacted by the changes but that the cost recovery discussions will take place as part of the DSC change process.

The Proposer agreed with the reflection of discussions at the UNC0843 meeting and noted that they did not foresee any addition costs beyond what may be incurred for ISE data requests. They added that there are no additional costs above and beyond the UNC0843 ROM as a result of IGT165.

An IGT asked about maintenance costs associated with the services provided by the ISE. The Proposer noted that the provisions related to the procurement of the ISE sit under the UNC and confirmed that there will be some ongoing costs associated with the ISE. The Proposer added that any costs associated with the delivery of data requests for IGT Supply Point level data falls under the IGT UNC and they cannot foresee any costs beyond those associated with data requests.

The IGT added that the IGT UNC is a contract between IGTs and Shippers and the UNC can be an extension of this, with the IGT UNC as a driver. They added further that the IGT UNC is enabling the ISE services and as it governs the IGT networks and is a contract in its own right, any discussions regarding ongoing costs are relevant.

The Workgroup noted the discussions, and the IGT believed that it was enough to call out the future unknown costs and costs associated with the ISE and its service. As it is expected to be determined at a later date under the DSC change processes. They determined that there is not a way of quantifying cost effectiveness at this time. Other Workgroup members agree with this view and that no further work is required at this time.

Impacts on IGT UNC parties

The Workgroup, keeping the solution and the draft legal text in mind, considered the impacts on IGT UNC Parties.

The Code Administrator noted that the Modification currently indicates that there is a medium impact on Shippers and Transporters and asked the Workgroup to consider if this is still the case.

The Proposer feels that the impact on Shippers is now low as any data requests for IGT Supply Point level data will go to IGTs rather than Shippers. The Workgroup agreed with the Proposer's view and also agreed that reference to Transporters should be changed to IGTs. The updated impacts on IGT UNC parties has been reflected on the cover page of this document.

Other impacts and costs

The Workgroup's final views and conclusions regarding other impacts and costs can be found in Section 6 of this document.

Implementation

The Workgroups final views and conclusions on implementation can be found in Section 8 of this document.

Initial Panel views

May 2025

The Code Administrator provided an overview of the Workgroup discussions that have taken place so far. The Code Administrator advised that there was a significant gap between two 'blocks' of Workgroup Discussion; those that took place between June 2023-March 2024, and those that took place between February 2025-May 2025. As the Workgroup discussion in February 2025 acted as a de-facto 'restart' on discussion of this Modification, the Code Administrator asked Panel to consider Workgroup findings from this point onwards for the sake of brevity, to which Panel agreed.

An IGT said that they felt that Workgroup did well to capture the impact of this Modification in the context of discussion of the proposed solution. They felt that the Workgroup had successfully captured the distinction between IGT165 and UNC0843 in terms of their separate scopes. Another IGT agreed that the Workgroup were both thorough and extensive in their discussion of the proposed solution, and that Workgroup discussions had successfully delineated between IGT165 and UNC0843. The IGT felt that Workgroup had been able to determine which elements of UNC0843 should be included within IGT165, but which elements should be excluded in order to ensure that the legal drafting of IGT165 did not result in dual governance across both Codes.

An IGT agreed that the Workgroup had successfully captured the appropriate governance arrangements within the legal text. They added that the justification of Consumer Benefit was challenging due to the lack of distinction between IGT165 and UNC0843. They highlighted an example of this where the Proposer had identified potential Consumer benefits which were expected to be realised under UNC0843, but that these same benefits were not intrinsic to IGT165. The IGT goes on to say that this exemplifies the difficult nature of the discussions undertaken by Workgroup and recognises that Workgroup were required to make complex determinations under difficult circumstances. This view is supported by another IGT, who said that Workgroup faced a difficult decision in identifying a demarcation between the benefits of IGT165 and UNC0843.

An IGT said that the scenario of an IGT UNC Modification being so intrinsically linked to a UNC Modification, but with distinct costs and benefits is relatively unprecedented within the Code in their view. That same IGT went on to say, however, that historically it has occasionally been necessary to determine the cost effectiveness of a Modification without a discrete view (i.e., where there is overlap with the UNC) of the cost effectiveness of the IGT UNC Modification in isolation, due to the governance nature of both Codes, as well as the governance processes of the CDSP.

The other voting members of the Panel agreed with the points raised by the two IGTs and had nothing further to add.

Panel decision

August 2025

The Panel considered all consultation responses and agreed unanimously that no further work was required on the solution and no new issues had been raised.

6 Impacts & Other Considerations

Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

The Proposer indicated when the Modification was raised that there were no impacts.

Workgroup discussions

March 2025

The Workgroup considered whether IGT165 may impact an SCR or any other significant industry change projects.

The Proposer asked the Workgroup how this Modification might impact Code Reform and when the changes associated with Code Reform may take place. The Code Administrator advised that there is not a firm timeline at the moment. However, it is clear from Ofgem's recent decision documents that the IGT UNC and the UNC will become the new Gas Network Code (GNC).

The Code Administrator advised that some loose timescales have been provided in some of the Code Reform decision documents, but this is more around the grouping of necessary work rather than specifically when the work will be carried out. They added that it has also been made clear that there will be some changes to both the UNC and the IGT UNC in the run up to the new GNC coming into force, but the timelines for these changes are not known.

The Chair responded that it would be up to Ofgem to determine the timeline for implementing the Modifications and any required Licence changes once the Modifications have been submitted for Authority decision, but there may be an implementation delay if Ofgem consults parties on the potential Licence changes.

Ofgem acknowledged the discussions and advised that they would take this away and potentially bring back some indicative view of timelines. The Chair thanked Ofgem for this and confirmed that it would be useful should the IGT UNC and UNC Modifications have an impact, as Code Reform will require a lot of work in its own right.

The CDSP highlighted that these Modifications will require procurement activities as well as system changes. There will be an 18-month lead time for the procurement activities so this will need to be considered.

Workgroup conclusions

April 2025

The Workgroup considered previous discussions and agreed that at some point there could be an impact on Code Reform but there is still a lot of uncertainty around the timescales for delivery and therefore the Workgroup is unable to determine what these potential impacts may look like.

The Workgroup noted that Ofgem will need to consider this as part of their assessment of the UNC and IGT UNC modifications and determine the impacts on Code Reform within their wider strategic position.

Initial Panel views

May 2025

The Code Administrator provided Panel with an overview of Workgroup discussions on how this Modification may impact an SCR or other significant industry change project. An IGT agreed that Workgroup had successfully captured the impact of Code Reform on both IGT165 and UNC0843, and echoed Workgroup's position that there is currently a lack of certainty on how Code Reform will impact these Modifications. Panel unanimously agreed with this IGT's position.

Panel decision

August 2025

The Panel considered all consultation responses and agreed unanimously that their views remain unchanged and that there is no impact on any SCR or significant industry change project.

Consumer impacts

What is the current consumer experience?

The Proposer has indicated that IGT Shrinkage is paid for by Shippers as UIG. UIG is a line item in the price cap. Therefore, customers will experience increased bills. Furthermore, methane as a green house has numerous negative impacts - the impacts of global warming are well documented.

What would the new consumer experience be?

The Proposer has indicated that by apportioning IGT Shrinkage to the party that causes it, this modification would remove IGT Shrinkage from the price cap and incentivise IGTs to lessen emissions.

Impact of the change on Consumer benefit areas

Area	Identified Impact
1) Improved safety and reliability <u>Proposer's Rationale:</u> Via the enablement of 0843, this modification would improve safety and reliability by providing IGTs with the means and incentivisation to reduce the causes of Shrinkage model error.	<u>Proposer:</u> Positive <u>Workgroup:</u> Neutral

2) Lower bills than would otherwise be the case <u>Proposer's Rationale:</u> Lower bills than would otherwise be the case - by supporting 0843, the removal of Shrinkage model error from UIG aims to reduce the UIG element of the Energy Price Cap, which is used to set customer bills on SVTs.	<u>Proposer:</u> Positive <u>Workgroup:</u> Negative
3) Reduced environmental damage <u>Proposer's Rationale:</u> Reduced environmental damage - in support of 0843, via the incentivisation of the reduction of Shrinkage model error and the provision of data via which gas leaks can be reduced, this aims to reduce the impacts of methane on the environment	<u>Proposer:</u> Positive <u>Workgroup:</u> Neutral
4) Improved quality of service <u>Proposer's Rationale:</u> Neutral with regards to improved quality of service, noting that elements of this have been touched on in other areas.	<u>Proposer:</u> Neutral <u>Workgroup:</u> Negative
5) Benefits for society as a whole <u>Proposer's Rationale:</u> In support of UNC0843, the incentivisation of the reduction of gas leaks would have a knock on impact for global warming and aligns with gov's net zero objective.	<u>Proposer:</u> Positive <u>Workgroup:</u> Neutral

Workgroup discussions (March 2025)

The Workgroup considered the potential impacts on consumers, and an IGT asked the Proposer to elaborate on why they felt the impacts on consumers would be positive as their rationale was not included.

Improved safety and reliability

The Proposer advised that, with regards to improved safety and reliability, UNC0843 will have a positive impact. However, IGT165 is only looking to enable the delivery of the ISE's jurisdiction over IGTs and IGT pipelines and the submission of IGT Supply Point level data. They asked the Workgroup whether the impact under IGT165 would be neutral, or if the enabling element would see the positive impact passed through under this Modification.

The Chair agreed with the rationale that the positive impacts could be assumed under IGT165 due to it being an enabling Modification, noting that whilst it does not in itself improve safety and reliability, it is there to support the delivery of a UNC Modification that has a positive impact. IGT165 will also enable the IGT sites to be fully included in the UNC0843 solution which also supports the extension of the positive impact. An IGT asked if this was in fact true as it does not identify where to improve the safety and reliability. The Chair advised that whilst it does not directly do this, the enabling element of IGT165 will extend the jurisdiction out fully over the whole of the network. If IGT165 was not implemented alongside UNC0843, then data for IGT sites as Supply Point level could not be provided to the ISE and therefore

the ISE could not draw the necessary conclusions or be able to comment at all with regards to IGT networks.

The IGT added that UNC0843 does not identify how to operate the network more safely, it does not identify where leaks are. The Chair asked if it will incentivise the management and handing of leaks in any way. The Proposer confirmed that this was the case due to the Charge as parties will want to reduce that charge.

Another IGT asked if the outputs of the ISE were at LDZ level, if they were then the IGTs would not be able to identify anything at the IGT level. The Proposer advised that within the ISE statement, appropriate backing data needs to be included to allow parties to address the causes of Shrinkage.

The Proposer concluded that their view is still that IGT165 will have a positive impact. The Chair asked for views of the Workgroup. The Workgroup agreed that the views were mixed, and the Chair asked whether we should therefore capture a neutral impact. A Workgroup member agreed with no other views provided.

An IGT noted that they will take these away and confirm their views in April.

Lower bills than would otherwise be the case

The Proposer advised that by supporting UNC0843, which looks to remove Shrinkage model error from UIG with the aim of reducing the UIG element of the energy price cap, and noting that the energy price cap is used to set customer bills, IGT165 would have a positive impact

An IGT advised that this would become a pass through and end up in a consumer's bills. The Proposer advised that it should not pass through due to RIIO. The Chair advised that in the case of a DN, this may not happen due to RIIO but there are varying arrangements under RIIO. The price control for IGTs is managed slightly differently so if the cost was placed on an IGT it would pass through. The IGT agreed with this and noted that where the bills are passed through for UIG, the different applications due to different consumers may make the impact neutral. Another IGT advised that this might not be the case, it might have to be taken off the bottom line. The Chair advised that this would be worth looking into and parties would need to explore this further ahead of the April meeting.

Reduced environmental damage

The Proposer advised that, in support of UNC0843, the banking data provided under IGT165 will be used to calculate the IGT ISC, the information provided in the ISE statements would then enable IGTs to have the means by which to reduce gas leaks, this aims to reduce the impacts of methane on the environment.

An IGT advised that they could not see how IGT165 could have a positive impact and UNC0843 does not go to a granular enough level for IGTs to identify where leaks are. The Proposer advised that it is not yet known exactly what the ISE will provide in its statements however there will be contractual obligations on the ISE to provide data at a level that will allow IGTs to identify leaks. Two IGTs responded noting that the ISC will be at LDZ level, which does not help parties distinguish between LDZ and IGT. The Proposer agreed with this view but added that the backing data included with the statements needs to include data at a level that allows parties to identify leaks.

Improved quality of service

The Proposer advised that they wanted to change from positive to neutral, they noted that the Workgroup have already touched on some of this under the other areas, so they feel it should be neutral. There were no other views raised by the Workgroup.

Benefits to society as a whole

The Proposer advised that society as a whole is impacted by global warming, and in support of UNC0843, the reduction in gas leaks would have a knock-on impact for global warming and aligns with the Governments net zero objective.

An IGT reiterated previous views on whether UNC0843 helps IGTs to identify where to resolve leaks. There were no other views put forward by the Workgroup.

Workgroup conclusions (April 2025)

The Workgroup acknowledge that whilst both Shippers and IGTs were in attendance, the final views put forward by the Workgroup on the impacts were voiced by IGTs only.

The Workgroup discussed whether the identified impacts of UNC0843 should be considered as part of the assessment of impacts for IGT165.

The Proposer felt that, as IGT165 is an enabling Modification of UNC0843, and there is a dependency between the Modifications, that the benefits and impacts of UNC0843 should be considered.

An IGT disagreed as they felt that as IGT165 is really only allowing the provision of IGT Supply Point level data to the Independent Shrinkage Expert.

There were differing views amongst Workgroup members on how to assess the proposed impacts. After some discussion, it was agreed by the Workgroup that they would assess the benefits and impacts of IGT165 in the same guise as the Proposer but there was still some disagreement amongst some members as to whether this was the right approach or not.

Improved safety and reliability

Having considered all previous discussions:

- The Proposer concluded that IGT165 still has a **positive** impact for the reasons set out in the table above, adding that via the enablement of UNC0843, this Modification would improve safety and reliability by providing IGTs with the means and incentivisation to reduce the causes of Shrinkage model error.
- An IGT, who noted that they still felt that safety and reliability was not within in scope of this Modification, advised that under the assumption it is in scope, they do not feel safety and reliability would be improved by as they are already appropriately regulated and therefore the impact is neutral. The Workgroup agreed with this view and that the impact was considered to be concluded as **neutral**.

Lower bills than would otherwise be the case

Having considered all previous discussions:

- The Proposer concluded that IGT165 still has a **positive** impact for the reasons set out in the table above.
- An IGT advised that there is currently no evidence that there will be lower bills as a result of UNC0843 or IGT165. They added that there will be additional costs as a result of the new service provider and the associated procurement activities. As a result, they feel the impacts could be negative considering the enabling elements for UNC0843. Another IGT agreed with this view and that there may be a negative impact, adding that there are unknown costs associated with the procurement of the third party. There were no other views put forward by the Workgroup and the impact was considered to be concluded as **negative**.

Reduced environmental damage

Having considered all previous discussions:

- The Proposer concluded that the impacts remained **positive** as set out in the table above.
- An IGT, who added that they did not feel that environmental damage was within the scope of this Modification, felt that there are already incentives in place on parties to reduce environmental damage. Another IGT agreed with this view. There were no other views put forward by the Workgroup and the impact was considered to be concluded as **neutral**.

Improved quality of service

Having considered all previous discussions:

- The Proposer concluded that the impacts remained **neutral** as set out in the table above.
- An IGT advised that, when considering the pass through from UNC0843, the impact is negative as there is an existing process in place for Shrinkage and that existing provisions could be amended at a reduced cost. Other IGTs agreed with this view. There were no other views put forward by the Workgroup and the impact was considered to be concluded as **negative**.

Benefits for society as a whole

Having considered all previous discussions:

- The Proposer concluded that the impacts remained as **positive** as set out in the table above.
- An IGT advised that, when considering the pass through from UNC0843, there would be a positive impact on society as a whole. Another IGT noted the ISE methodology is not yet known and so they feel there is a neutral impact. Another IGT agreed with the view and that the impact was neutral. There were no other views put forward by the Workgroup and the impact was considered to be concluded as **neutral**.

Initial Panel views

May 2025

The Code Administrator provided Panel with an overview of Workgroup discussions on how this Modification impacts Consumer Benefit Areas. An IGT agreed that Workgroup successfully captured the distinction between the benefits of UNC0843 and those of IGT165. They said that whilst the Proposer had presented benefits directly lifted from UNC0843, Workgroup had successfully captured how IGT165 has a distinct benefits case, and they felt that Workgroup had identified this nuance. The IGT felt that discussion of this Modification was likely to have been challenging to Workgroup on account of the blurred distinction between the benefits of the UNC Modification and those of the IGT UNC Modification.

Another IGT felt that in their view the Proposer was seeking to limit the scope of IGT165 in order to minimise the costs of the Modification, but at the same time was referencing benefits of UNC0843 without the same limitation of scope. They felt that Workgroup had reasonably managed to navigate this distinction in cost and benefits between the two Modifications. The other voting members of the Panel agreed with the points raised by the two IGTs and had nothing further to add.

Panel decision

August 2025

The Panel considered all consultation responses and agreed unanimously that no further work was required by the Workgroup with regards to Consumer impacts.

Cross-Code impacts

UNC0843 sets up the role of ISE in UNC, though there is no direct impact on the UNC expected. IGT Shrinkage is acknowledged as being dealt with by UNC TPD Section H2.6 - consideration of

this will be needed in the workgroup.

UNC	☐
REC	☐
Other	☐
None	☒

Workgroup discussions

March 2025

The Workgroup considered the impact of IGT165 on other industry Codes. The Code Administrator advised that usually where an IGT UNC Modification has been raised that is either mirroring or enabling a UNC Modification, we usually note the relationship between the Modifications but do not indicate a direct UNC impact.

The Proposer agreed with this approach. An IGT acknowledged that there was an implementation dependency in that IGT165 should not be implemented if UNC0843 is rejected. There were no other views provided by the Workgroup.

Workgroup conclusions

April 2025

An IGT questioned whether there may be an impact on the UNC if IGT165 was not implemented.

The Code Administration referenced previous Workgroup discussions and noted that it had previously been agreed that the UNC0843 solution could not be fully implemented without also having IGT165 implemented. That said, there were no direct impacts on other codes as a result of IGT165.

The Workgroup considered the previous discussions and agreed that there while there were dependencies for implementation there were no other Code impacts as a consequence of IGT165.

Initial Panel views

May 2025

The Code Administrator provided Panel with an overview of Workgroup discussions on whether this Modification has Cross-Code impacts. An IGT said that they felt that Workgroup discussions on Cross-Code impacted further demonstrated previously raised views regarding the complexity of the discussions on account of the distinctions between IGT165 and UNC0843. They added that in their view it could have been argued successfully that there may be a material impact on the UNC but is satisfied with the Workgroup position that there is not, on account of a robust discussion having taken place. This position was supported unanimously by all members of the Panel.

Panel decision

August 2025

A Panel member referenced previous discussions with regards to cross-Code impacts. They asked whether, if this Modification is not approved, if IGTs have to comply with the ISE and the IGTAD.

The Chair confirmed that they will have to comply with the provision under the UNC. The only difference being that the ISE's ability to do what they needed to do would be impeded as the IGT Supply Point level data submission element would not be in IGT UNC.

The Code Administrator noted that there were no direct Code impacts identified as a direct result of IGT165. However, there could be an impact on the ISE as they may be unable to get the data they need without this Modification. The member noted this and added that they believe a cross-Code impact is not just an impact to a Code document. They raised a question regarding the governance of the IGTAD. The Chair confirmed that the IGTAD details the relationship between IGTs and GDNs but is governed under the UNC.

The Panel considered all consultation responses and agreed *unanimously* that *no further work was required*.

Environmental impacts

The Proposer's view, as described in other areas of this document, is that Methane is 84x more potent than carbon dioxide. AUGE forecasted (at the time this Modification was raised) that 19 Gwh's of methane will be leaked into the atmosphere in gas year 2023/24⁸. The Proposer believes that IGT165 will, via the enablement of UNC0843, incentivise the reduction of the causes of Shrinkage model error.

Workgroup discussions

March 2025

The Proposer reiterated their view as set out above. An IGT asked whether the 19Gwh's referenced was for IGTs. The Proposer confirmed that this was the case and added that GDN Shrinkage was not covered in the 2023/24 report.

An IGT noted that the 19Gwh's has changed since the 2023/24 report, though the value is accurate at the time the Proposer provided the information above. The IGT provided a link to the [2023/24 report](#) for reference.

Workgroup conclusions

April 2025

The Workgroup considered whether there were any environmental impacts because of this Modification, also considering previous views and discussions.

An IGT noted that there is currently no evidence that IGT165 or UNC0843 will reduce gas leaks. The Proposer reiterated their previous views and added that they believe that this will, via the enablement of UNC0843, incentivise the reduction of the causes of Shrinkage model error. The IGT disagreed with this view as IGT165 will not enable this via the data requests. There were no other views put forward by the Workgroup and no specific environmental impacts identified. The Workgroup considered the matter closed and that no further work was required with regards to this matter.

Initial Panel views

May 2025

The Code Administrator provided Panel with an overview of Workgroup discussions on the Environmental Impacts of this Modification. An IGT said that, once again, Workgroup discussions on this are indicative of the broader challenge of creating a distinction between the costs and benefits of IGT165 and UNC0843. They said that if IGT165 were taken entirely on its own merits, they would agree with the assertion that

⁸ It should be noted that the values provided by the Proposer for the 2023/34 gas year may differ to the current gas year.

there is no evidence that this Modification will directly contribute to a reduction in methane emissions. However, they acknowledge that the difficulty faced by Workgroup in these discussions is that the benefits from UNC0843 are being used to support IGT165, resulting in a UNC benefits case that is not reflective of the benefits case within the IGT UNC in its own right. All Panel members supported this position.

Panel decision

August 2025

The Panel considered all consultation responses and agreed unanimously that no further work was required with regards to environmental impacts.

Rough Order of Magnitude (ROM)

Costs provided within the latest [UNC0843 ROM](#) dated 10th March 2025 are indicative and high level based on high level analysis conducted by the CDSP.

Below sets out the high-level implementation cost range and provides an indication of any ongoing costs identified from the high-level analysis.

Implementation costs

An enduring system solution will cost **at least £180,000 but probably not more than £315,000**. For clarity the range does not take into consideration the procurement of an ISE and is purely for system impacts only.

Ongoing costs

The CDSP anticipates the following:

- **Systems** – The change is not expected to increase ongoing running costs.
- In terms of support / representation at Shrinkage industry meetings, this will be assessed once further details are known. Costs for support / representation at meetings are not included in this ROM.
- No data requests to the CDSP are expected. Data requests are unknown and are likely to be made to the Transporters. Therefore, requests for data held by the CDSP are not included in this ROM

Timescales

The implementation timescales are as set out in the ROM are as follows:

- **Systems**: The high-level estimate to develop and deliver this change is approximately **16 weeks and includes two weeks of Post Implementation Support**.
- **Procurement of the ISE**: As stated, we have not provided an indicative cost range for the procurement and ongoing activities of an ISE but from a timescale perspective, please note that a lead time will be required to undertake the procurement exercise to appoint an ISE. Typically, a minimum of 12 months is required to undertake a procurement exercise to appointment, however due to this being a new role, we are expecting to undertake a two phased approach to initially understand what bidders can offer, followed by a more targeted second-phase. For the avoidance of doubt, Modification 0843 / IGT 165 must be approved by the Authority and the necessary GT and IGT Licence changes made, ahead of the procurement exercise for the Independent Shrinkage Expert beginning. Once the Licence updates have been made, and Authority approval

received, the procurement exercise will take a minimum of 18 months. Please note that a Stakeholder Evaluation Panel (SEP) would need to be in place prior to the start of the procurement exercise. It is recommended that the SEP should include IGT members to ensure their views are represented in the procurement exercise. Subject to the required system changes, and the successful procurement of an Independent Shrinkage Expert, the solution for UNC0843 and IGT 165 would be implemented as soon as reasonably practicable.

Ongoing processes:

To confirm, to load the approved Shrinkage values into the system on an ongoing basis for the start of the process year (01 April), the CDSP require a minimum **lead time of two weeks**. This means the CDSP must have the approved Shrinkage values to be utilised for the year, at least **two weeks** before the 01 April.

Workgroup discussions

March 2025

The Chair asked the CDSP if the ROM submitted for UNC0843 is for the implementation of both Modifications together. The CDSP advised that there is nothing separate under this Modification which the CDSP is being asked to implement beyond UNC0843. The CDSP added that they would want both Modifications to be implemented at the same time.

The Chair asked what would happen if IGT165 was not implemented at the same time as the UNC Modification, for example would the CDSP have to extract the use of IGT data. The CDSP advised that it was their understanding that this would not be the case as the UNC Modification requires data to be provided by IGTs who have to comply with the UNC provisions. The Chair responded noting that IGT Supply Point level data sits under the IGT UNC so the CDSP would be unable to use that level of data without provisions to allow it.

The Code Administration referenced the data provisions within the IGT165 legal drafting, noting that this was added in to ensure that if the ISE needed IGT Supply Point level data, that IGTs would be required to provide it as IGT Supply Point level data is not within the governance of the UNC. They added that the UNC0843 Legal Text referenced “data” generally as it is not clear at the moment what level of data the ISE will need. Therefore, the provision for IGT Supply Point level data is required.

The CDSP acknowledged this and confirmed that in this instance they would need both Modifications to be approved in order to implement UNC0843.

Workgroup conclusions

May 2025

The Workgroup noted previous discussions in relation to the ROM, as set out in this document. The Workgroup agreed that no further work is required with regards to this matter.

Initial Panel views

May 2025

The Code Administrator provided Panel with an overview of Workgroup discussions on the ROM costs provided by CDSP. An IGT reiterated the previous point that Workgroup discussions on ROM costs are indicative of the difficulty faced by Workgroup to identify a clear demarcation between the IGT UNC Modification and the UNC Modification. They said that the provision of data and its associated costs are specific to UNC0843 and therefore shouldn't be taken into account when considering IGT165. They went on to add that the procurement of the ISE is also entirely within the scope of the UNC Modification, and as such should not be considered within the scope of IGT165 in their view. This IGT then elaborated on

how this would have complicated discussions for Workgroup, as blurring of lines between UNC benefits and IGT UNC benefits creates a conflict between the conclusions of Workgroup and those of the Proposer.

Panel decision

August 2025

The Panel considered all consultation responses and agreed unanimously that no further work was required.

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:

Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	<u>Proposer</u> : Neutral <u>Workgroup</u> : Negative
(B) Co-ordinated, efficient and economic operation of (i) the combined pipe-line system; and/or (ii) the pipe-line system of one or more other relevant gas transporters	<u>Proposer</u> : Neutral <u>Workgroup</u> : Negative
(C) Efficient discharge of the licensee's obligations	<u>Proposer</u> : Neutral <u>Workgroup</u> : Neutral
(D) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers	<u>Proposer</u> : Neutral <u>Workgroup</u> : Neutral
(E) The provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers.	<u>Proposer</u> : Neutral <u>Workgroup</u> : Negative
(F) Promotion of efficiency in the implementation and administration of the Code	<u>Proposer</u> : Neutral <u>Workgroup</u> : Negative
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	<u>Proposer</u> : Positive <u>Workgroup</u> : Negative

Proposer rationale

The Proposer believe that, at its heart, the motivation for this Modification is net zero and customer billing. Unfortunately, there are no Relevant Objectives that are specific to these

two areas. In light of this, the Modification is predicated on Relevant Objectives G) – to cover off Net Zero – and E) – to cover off security of supply.

The Proposer has suggested that the Relevant Objectives be updated to include Relevant Objectives that encompass these two areas, and the Authority has taken note that it will consider them as part of Energy Codes Reform.

Relevant Objective G) “Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators” –At its heart, UNC0843 aims to facilitate Net Zero via the incentivisation of the reduction of the causes of Shrinkage model error.

The UK, and European Commission, are bound to various laws and regulations related to achieving Net Zero emissions by 2050, as part of the European Union's broader climate goals.

For example:

- The Paris Agreement, which sets global targets for reducing climate change and limiting global temperature rise to well below 2°C, aiming for 1.5°C.
- UK Climate Change Act (2008): The UK has its own Climate Change Act, which predates Brexit and has been updated since to align with the EU's goals. In 2019, the UK became the first major economy to pass a legal commitment to reach net-zero emissions by 2050. This is similar to the EU's net-zero target, but it is the UK's national legal obligation, separate from EU laws
- European Climate Law: The European Climate Law, which came into force in 2021, legally commits the EU to reach net-zero greenhouse gas emissions by 2050. This law establishes a framework for achieving this goal and sets an interim target of reducing emissions by 55% by 2030 compared to 1990 levels. The law also requires the Commission to propose the necessary legislative and policy measures to ensure these targets are met.
- The European Green Deal: Announced in December 2019, the European Green Deal is a comprehensive roadmap that aims to make Europe the first climate-neutral continent by 2050.
- Fit for 55 Package: As part of the Green Deal, the Fit for 55 package, introduced in 2021, aims to reduce EU emissions by 55% by 2030.”

Relevant Objective E) “Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.”

Via incentivising the reduction of the causes of Shrinkage model error, such as gas leaks and misreporting on own use gas, there is the potential for increased accuracy in the accounting of GB's gas inventories. This is intended to increased security in our supply of gas. If all unaccounted gas was accounted for approx. 11 TWh is attributed to UIG and 2.5 TWh is attributed to Shrinkage as detailed in the [AUG Final Statement 24/25](#) (see **pages 24 and 117 for Shrinkage error and UIG vols respectively**) – 13.5 TWh is enough gas to power 1,174,000 million average homes (average = 11,500kWh).”

Workgroup discussions

March 2025

The Workgroup considered the impact that IGT165 would have on the Relevant Objectives, as set out in the Proposal Form (in which the Proposer indicated a positive impact on all of the Objectives).

An IGT referenced previous discussion regarding whether or not the Statement provided by the ISE will allow IGTs to identify leaks and address them. Therefore, the impact on the objectives could be positive or neutral. Another IGT agreed with this view. The Proposer reiterated that the backing data will need to be at a granular enough level to enable this.

An IGT asked whether the views on the Objectives match UNC0843. The Proposer confirmed that this was not the case. The Chair asked the Proposer if they wanted to align their views to that of UNC0843. They added that Ofgem will review the Objectives impacted by a Modification and made a decision based on these.

The Code Administrator shared the views against the Objectives within the latest version of the UNC0843 Workgroup Report (shared at the February UNC Workgroup meeting). The Proposer advised that they hung the views against the Objectives on Net Zero for Objectives G) and E).

The Proposer considered the views under UNC0843 and advised that their views against the Objectives would be the same under IGT165 and asked that the views be copied and pasted into the Workgroup Report.

Workgroup conclusions (May 2025)

Relevant Objectives A) & B)

A Workgroup member (IGT) felt that this Modification would have a negative impact on Relevant Objectives A) and B) as there are already existing Shrinkage mechanisms in place that could have been amended. They added that creating a new mechanism will add additional unnecessary costs to industry. Another member (IGT) agreed with this view.

There were no other views put forward by the Workgroup and the Workgroup agreed that the impact on these Objectives is **negative**.

Relevant Objective C)

The Proposer noted that there are existing Licence Obligations in place in relation to this Objective and the use of correct data. However, they believe that the impact on this Objective is still neutral.

A Workgroup member (IGT) noted that there are already mechanisms in place with regards this and that they cannot see how the outputs from the ISE will impact those mechanisms and therefore the impact is neutral.

There were no other views provided by the Workgroup and they agreed that the impact on this Objective is **neutral**.

Relevant Objective D)

There were no specific views provided by the Workgroup with regards to this Objective, but the Workgroup agreed that the impact is **neutral**.

Relevant Objective E)

The Proposer provided additional context regarding their rationale for choosing G) (as well as E)), which has been reflected within their rationale set out above.

A Workgroup member (IGT) acknowledged this and noted previous discussions on the gaps related to Net Zero within the Objectives.

A Workgroup member (IGT) noted the unknown costs on procuring the ISE and felt that this may have a negative effect on the Objective. The Proposer noted that the procurement of the ISE will not happen under IGT165 and therefore the costs associated with it sit outside of the IGT UNC.

Another member (IGT) referenced the use of “Supplier” within the Objective wording and wondered if the impact can be considered as positive when looked at in relation to Transporters. Another Workgroup member (IGT) seconded the question though there were no specific views raised with regards to it.

A Workgroup member (IGT) noted the intent of this Modification and that it is looking to only enable the provision of data and questioned whether there could be a positive impact with regards to the Relevant Objectives.

The Workgroup considered the above discussions, and no further views were put forward. The Workgroup agreed that the impacts on this Objective was **negative**.

Relevant Objective F)

A Workgroup member (IGT) noted that as there is already a mechanism for Shrinkage and that the introduction of the ISE creates a dual governance issue as there will be two schemes dealing with the issue of Shrinkage rather than there being two schemes that are working together to address the issue of Shrinkage. The Proposer did not believe that the introduction of the ISE will not create a dual governance issue as the ISE is not looking at Shrinkage but rather model error.

There were no other views provided by the Workgroup and the Workgroup agreed that the impact against Relevant Objective F) is **negative**.

Relevant Objective G)

A Workgroup member (IGT) noted that there are already regulation and Licence Conditions in place that incentivise transporters and therefore the impact against this objective is negative.

The Proposer responded that the current mechanisms in place for Shrinkage have it set to zero for IGTs and therefore it all flows into UIG.

A Workgroup member (IGT) responded noting that it is set to zero for a reason and that this is because the value is considered to be di minimis. They also noted that this value gets reviewed periodically by the Independent Networks Associated (INA), with input from DNs. They also noted that there is an external party that runs the relevant modules. The value has consistently been determined to be di minimis. The Workgroup member therefore believes that it should be a negative impact.

There were no other views provided by the Workgroup and the Workgroup agreed that the impact on this Objective is **negative**.

Initial Panel views

May 2025

The Code Administrator provided Panel with an overview of Workgroup discussions on how this Modification achieves the IGT UNC Relevant Objectives.

An IGT said they felt that Workgroup had successfully explored the Relevant Objectives achieved by IGT165 and again raised the point that Workgroup discussions had navigated the challenges raised by the distinctions between UNC and IGT UNC costs and benefits. This IGT makes specific reference to the perceived paradox of the Proposer identifying that UNC costs are separate and distinct from IGT UNC costs, but that the benefits are not. All other Panel members agree with this view.

Panel decision

August 2025

The Panel considered all consultation responses and agreed unanimously with the Workgroups views on the objectives and that this Modification will have an impact on the Objectives as follows:

- Objective (A): Negative
- Objective (B): Negative
- Objective (C): Neutral
- Objective (D): Neutral
- Objective (E): Negative
- Objective (F): Negative
- Objective (G): Negative

Please note that the Panel also agree in line with Workgroup rationale as set out within this section.

8 Implementation

Implementation approach

The Proposer and Workgroup recommend that this Modification:

- should be implemented at the same time as UNC0843;
- should only be implemented if UNC0843 is implemented; and
- should only be implemented when required Licence changes are put in place.

ROM implementation timescales

The implementation timescales as set out in the ROM are as follows:

- **Systems**: The high-level estimate to develop and deliver this change is approximately **16 weeks and includes 2 weeks of Post Implementation Support**.
- **Procurement of the ISE**: As stated, we have not provided an indicative cost range for the procurement and ongoing activities of an ISE but from a timescale perspective, please note that a lead time will be required to undertake the procurement exercise to appoint an ISE. Typically, a minimum of 12 months is required to undertake a procurement exercise to appoint, however due to this being a new role, we are expecting to undertake a two phased approach to initially understand what bidders can offer, followed by a more targeted second-phase. For the avoidance of doubt, Modification UNC0843 / IGT165 must be approved by the Authority and the necessary GT and IGT Licence changes made, ahead of the procurement exercise for the Independent Shrinkage Expert beginning. Once the Licence updates have been made, and Authority approval received, the procurement exercise is expected to take a minimum of 18 months. Please note that a Stakeholder Evaluation Panel (SEP) would need to be in place prior to the start of the procurement exercise. It is recommended that the SEP should include IGT members to ensure their views are represented in the procurement exercise. Subject to the required system changes, and the successful procurement of an Independent Shrinkage Expert, the solution for UNC 0843 and IGT 165 would be implemented as soon as reasonably practicable.

Workgroup discussions

March 2025

The Workgroup considered the implementation approach for IGT165, noting that the current approach recommends implementing IGT165 concurrently with UNC0843.

An IGT agreed with the current approach but added that if UNC0843 was rejected, this Modification should not be implemented. The Proposer agreed with this view.

The Chair asked the Workgroup if there were any specific lead times known to them that would need to be considered. The CDSP referred to the lead times within their ROM (which are noted above), they added that whilst the procurement period would usually be 12 months, they have accounted for a larger lead time of 18 months to account for the fact that they have never procured for this role before.

The Code Administrator asked the CDSP whether they will need both Modifications implemented before they can start work on the procurement or simply approved. The CDSP confirmed that they will start work once the Modifications have been implemented and then once work gets to a certain point the implementation date can be agreed. They added that there will be two pieces of work, the procurement work and the system changes via the DSC change process. The lead time for the system changes is approximately 16 weeks.

An IGT noted the required Licence changes to enable the implementation of this Modification. The Code Administrator confirmed that this would be noted in the Implementation section of this Document.

The CDSP asked if the Code Administrator will publish a notice of implementation with a date to be confirmed whilst the Modification is pending implementation like under the UNC. The Code Administrator confirmed that the IGT UNC takes the same approach.

Workgroup conclusions

May 2025

The Workgroup considered previous discussions and agreed that the proposed implementation approach, as set out above, remained appropriate and had no further comments.

Initial Panel views

May 2025

The Code Administrator provided Panel with an overview of Workgroup discussions on this Modification's proposed Implementation Approach. All Panel members agreed that Workgroup had successfully considered the Implementation Approach.

Panel decision

August 2025

The Panel considered all consultation responses and agreed unanimously with the proposed implementation approach as set out above.

9 Legal Text

Suggested approach

The Proposer suggests that the Legal text to be developed as part of the progression of the Modification. However, they recommend the following:

- The role of the ISE is defined under UNC, and the definition contained therein shall prevail in the event of ambiguity. However, for reference within the IGT UNC this can be defined as:
 - Independent Shrinkage Expert: the ISE will be governed by the UNC and will use independently developed methodologies to forecast the amount of gas that can be

considered Shrinkage but has not been purchased by pipeline owners to cover, and therefore has entered into UIG in error.

- Independent Shrinkage Charge: the ISC is the value of gas that must be purchased by pipeline owners. It is the difference between the amount of gas that pipeline owners calculate to be lost via Shrinkage and that which is calculated by the ISE.
- Where reasonable, the IGT parties shall comply with data requests made by the ISE.
- Where the Authority agrees with the ISC that is applicable to IGTs as calculated by the ISE, IGTs must purchase gas to cover the ISC, in accordance with the IGTAD

Workgroup discussions

Please note that some discussions by the Workgroup that relate to the legal text are set out within the solution section of this document.

March 2025

The Code Administrator took the Workgroup through the updated legal text, highlighting changes made following discussion at the February 2025 meeting.

The Workgroup highlighted a couple of other further minor amendments as follows, which the Code Administrator confirmed would be made ahead of the April 2025 Workgroup meeting:

- Removing remaining references to Shrinkage model error; and
- Correcting an error in the existing Shrinkage text that is being moved into the new Part FI.

The CDSP asked whether the definition of Shrinkage Charge needed adding. The Code Administrator confirmed that this was not necessary as the “catch all” part of the legal text ensures that nothing in the IGT UNC could get in the way of any IGT UNC party complying with what was required of them under the UNC. The ISC sits within the UNC and therefore the governance of this charge sits outside of the IGT UNC. The IGT UNC cannot dictate what happens in the UNC but it can ensure that nothing within Code can interfere with UNC provisions.

No other changes to the legal text were suggested by the Workgroup.

Workgroup conclusions

April 2025

The Workgroup considered the final legal text as well as all previous discussions and conclusions on the solution.

The Workgroup agreed that the legal text delivers the intent of the solution and that no further changes were required.

Initial Panel views

May 2025

The Code Administrator provided Panel with an overview of Workgroup discussions on whether this Modification’s legal drafting successfully delivers the intent of the Modification. All Panel members agreed that Workgroup had fully considered this.

Panel decision

August 2025

The Panel considered all consultation responses and agreed unanimously that the draft legal text delivers the intent of the solution, and no further work was required.

10 Consultation

Panel invited representations from interested parties by 11th July 2025. The summaries in the following table are provided for reference on a reasonable endeavour's basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report and can be found [here](#).

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
E.ON	Support	A - Neutral B – Neutral C - Negative D – Neutral E - Negative F – Negative G – Negative	• Supportive of the introduction of the Shrinkage Expert and believe that it would bring benefits akin to those that we have seen from the AUGÉ's work for UIG. • Agree that the Modification should be an Authority Decision Modification Proposal. • Support Workgroup views against the Relevant Objectives. Full rationale is included in the consultation response, a summary of all views against objectives is below. • Believe cost impacts are mainly funding of the expert rather than internal running costs. They expect that anything which is introduced would see normal contractual rigor applied to it to ensure it remains a robust and cost-effective service. • Agree with implementation approach and would prefer that the UNC and IGT UNC Modification implementation be aligned for consistent delivery. • There were no comments provided on the legal text changes. • The Code Administrator reached out to the respondent to confirm their support for implementation, as they also cited support for Workgroup's views against the objectives, which were largely negative. The respondent confirmed that they support the intent of the Modification but some of the justification

			against the objectives cited by the Proposer may not have been the strongest. Therefore, they elected to support the Workgroups views on objectives as well as support the implementation of the Modification.
National Energy System Operator (NESO)	Do not support	A - Neutral B – Neutral C - Neutral D – Neutral E - Neutral F – Negative G - Neutral	- Do not support the implementation of the Modification. Believe that while the Proposer has made it clear that there is a need to address and reduce Shrinkage, the proposed solution is not the most direct approach. Further detail is within the consultation response. - Agree that the Modification should be an Authority Decision Modification Proposal. - Believe that this Modification will have a neutral impact on all Objectives other than F, which they believe will be negatively impacted. Full rationale is included in the consultation response; a summary of all views against objectives is below. - No comment on impacts or costs as NESO is not an impacted party. - No comment on implementation as NESO is not an impacted party. - NESO are satisfied that the Legal Text will deliver the Solution. However, they did highlight a minor typographical error which the Code Administrator has picked up. - No other comments on the Modification. However, they did highlight a correction for the Modification Report which the Code Administrator has picked up.
BUUK	Do not support	A - Negative B – Negative C - Neutral D – Neutral E - Negative F - Negative G - Negative	- Do not support the implementation of the Modification. They note that they appreciate the time and effort that has gone into drafting IGT165, and, in principle, support the enabling function it looks to create for UNC0843. However, they are not able to support IGT165, and the enabling of UNC0843. Further information provided in the consultation response. - Agree that the Modification should be an

			Authority Decision Modification Proposal. • Believe this Modification will have a negative impact on Objectives A, B, E, F and G, with a neutral impact on C and D. Full rationale is included in the consultation response, a summary of all views against objectives is below. • Do not believe there would be impacts and costs directly associated with IGT165. • The proposed timeline for IGT165 is inherently tied to UNC0843. The ROM suggests system changes could be done in 4 months, but the critical path is the ISE procurement, a minimum of 18 months. The timeline should be tied to the procurement and establishment of the ISE and supporting processes. They recommend that implementation be conditional to these timescales. • The suggested legal text delivers the intent of the Modification as currently proposed, which is to enable the provision of data for the ISE to use from IGTs to help the creation of the ISMM. • They appreciate the intent to reduce greenhouse gas emissions. However, we urge Panel to consider whether the same objectives could be achieved with simpler means within the IGT code or via existing UNC mechanisms. We respectfully oppose IGT165 as drafted, in favour of a more defined solution. • New additional issues highlighted, please see the rest of this section for a summary of all new additional issues, as well as the consultation response.
ESP Pipelines Ltd	Do not Support	A - Negative B – Negative C - Neutral D – Neutral E - Negative F - Negative G - Negative	• Do not support the implementation of the Modification. Whilst they support the goal of reducing greenhouse gas emissions and lowering customer bills, it is not clear to the respondent that the establishment of a new body to develop a new methodology is an efficient or effective way to achieve those goals. They have not seen evidence that the route to address these issues, using existing

			mechanisms and industry processes have been exhausted. See response for further rationale. • Agree that the Modification should be an Authority Decision Modification Proposal. • Believe this Modification will have a negative impact on Objectives A, B, E, F and G, with a neutral impact on C and D. Full rationale is included in the consultation response, a summary of all views against objectives is below. Feels that IGT165 does not stand alone and cannot be implemented without reference to UNC0843. Whilst IGT165 does not in itself impose costs on parties, the enabling Mod UNC0843 is likely to impose significant cost, albeit these cannot yet be quantified. Further rationale can be found in the consultation response. • The timeline for implementation must be linked to the implementation of UNC0843, and the procurement of the ISE. • No comments on the legal text. • New additional issues highlighted, please see the rest of this section for a summary of all new additional issues, as well as the consultation response.
Indigo Pipelines Ltd	Do not support	A - Negative B – Negative C - Neutral D – Neutral E - Negative F – Negative G - Negative	• Do not support the implementation of this Modification. They note that the Proposer of IGT165 has requested that parties consider this Modification in isolation and on its own merits. However, they do not feel that IGT165 can be considered alone as it is intrinsically linked to UNC0843. As they do not support UNC0843, they cannot support IGT165. Further rationale is included in the consultation response. • Agree that the Modification should be an Authority Decision Modification Proposal. • Believe this Modification will have a negative impact on Objectives A, B, E, F and G, with a neutral impact on C and D. Full rationale is included in the consultation response, a summary of all views against objectives is below.

			• As the data required to be provided to the ISE, plus the method and timescales for transferring it, is unspecified, they cannot identify the costs and impact of compiling & providing it. The data would have to be at a fairly low level of granularity to have any meaningful input to the Shrinkage model and therefore may be difficult to obtain. As the costs are currently unknown and uncapped, it poses an unacceptable risk. • As IGT165 is so closely inter-linked with UNC0843, they should be implemented at the same time. The timeframe for implementing these Modifications must be led by the Authority's timeline for making the necessary Licence changes and the timeline for procuring and establishing the ISE. IGT165 should not be implemented until the ISE is established and the data requirements are defined. • Agree that the drafting delivers the intent of the solution. • They feel the Proposer's aim of supporting net-zero and reducing Shrinkage could be achieved more efficiently and cost effectively through the existing Shrinkage arrangements.
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Summary of responses

There were five responses to the IGT165 consultation, three were received from IGTs, one was received from a Shipper and one was received from NESO.

The Code Administrator recommends that all consultation responses are looked at individually. All responses to the IGT165 consultation can be found [here](#).

Governance

All respondents agreed that the Modification should be treated as an Authority Decision Modification.

Support for implementation

One respondent (Shipper) supported the implementation of the Modification. A summary of rationale is set out below, with full details included in their individual response:

- Supportive of the introduction of the Shrinkage Expert and believe that it would bring benefits akin to those that we have seen from the AUGE's work for UIG, further rationale is included in their response.
- Shrinkage is part of the unidentified element of gas balancing and has potential to pose significant impacts on both UIG and Shipper energy costs. The AUGE identified Shrinkage volumes as an area that needed looking at, but it has been difficult to gain traction. They would be in favour of an independent organisation being given a Shrinkage role, similar to the AUGE, to

investigate likely Shrinkage values and be able to work with all parties in ensuring the right volumes of gas are charged to each party.

- The current models used by GDNs have been in place for many years, and techniques have improved significantly. Believe that organisations with expertise in these areas could both improve the modelling and help identify any leakage issues for investigation by the Networks.
- Support any move that provides additional expertise in this area to ensure costs are as low as possible for consumers and incentivising the right parties with targeted costs.

The respondent provided additional context outside of their consultation response. Noting that they support the introduction of a Shrinkage Expert and therefore support implementation. However, they feel that the views expressed by the Proposer against the objectives are not strong enough and have therefore chosen to agree with the Workgroup with regards to views on the objectives.

Four respondents (IGTs & NESO) do not support the implementation of this Modification. A summary of rationale is set out below, with full details included in their individual responses:

- While the Proposer has made it clear that there is a need to address and reduce Shrinkage, the proposed solution is not the most direct approach.
- Implementing this Modification may add complexity through the introduction of an ISE and associated processes, incur additional unknown costs for procuring an ISE and create further time constraints in the production, review and approval/disapproval of the ISS by Ofgem.
- IGTs have no current arrangements to measure or report on their Shrinkage, as the estimated volume is set to 0. It would be more prudent to first establish a process within Shrinkage where IGTs, even if nominal, have an estimated Shrinkage volume that they can account for.
- More appropriate to analyse the root cause of the Shrinkage model error by conducting a review on the Shrinkage and Leakage Model (SLM) and the data it uses, including IGTs involvement. Also suggested that a review of existing Shrinkage processes generally is undertaken to explore efficiencies sought from UNC0843 and IGT165.
- Concern regarding processes involving Ofgem. For example, when Ofgem are presented the ISS and ISC for assessment they will be analysing their own findings from the LDZ LSQ generated by the SLM. This raises the possibility that one model's outputs would have to be 'disapproved' by Ofgem, as logic would suggest that both models cannot be correct.
- Concerns with UNC0843, and as the Proposer made repeated references to the benefits and structure introduced under the UNC Modification, they have referenced that Modification throughout their response. Many of the concerns will have wider ramifications that will impact IGT UNC parties.
- Whilst they support the goal of reducing greenhouse gas emissions and lowering customer bills, it is not clear that the establishment of a new body to develop a new methodology is an efficient or effective way to achieve those goals. They have not seen evidence that the route to address these issues, using existing mechanisms and industry processes, have been exhausted, and do not support the approach developed under UNC0843. Given that they do not support the creation of the ISE, it follows that they do not support the implementation of an obligation to comply with it.
- Notes that the Proposer of IGT165 has requested that parties consider this Modification in isolation and on its own merits. However, they do not feel that IGT165 can be considered alone as it is intrinsically linked to UNC0843, as demonstrated in the extensive Workgroup discussions, and the Proposer's own rationale of the benefits of IGT165 which explicitly refer to UNC0843. As

they do not support UNC0843, they are therefore unable to support IGT165. It is their view that UNC0843 & IGT165 introduce unacceptable amounts of complexity and cost and will not deliver the benefits suggested by the Proposer.

Relevant Objectives

Summary of views against Objectives				
Obj.	Positive	Negative	Neutral	Overall View
A	-	3	2	Majority view is negative
B	-	3	2	Majority view is negative
C	-	1	4	Majority view is neutral
D	-	-	5	Unanimous view is neutral
E	-	4	1	Majority view is negative
F	-	5	-	Unanimous view is negative
G	-	4	1	Majority view is negative

A summary of respondents' views against the Objectives is below. We encourage readers to review all rationale provided in individual consultation responses.

- **Objective A**

- **Negative:** There are already existing Shrinkage mechanisms in place that could have been amended. Creating a new mechanism may introduce unnecessary costs to industry. Existing processes could be modified at a lower cost than the new ISE approach, and that quality of service could worsen under the new mechanism. It cannot be economic and efficient to replicate an existing process. There is no evidence to show a new external agent will provide a better quality of service than the current mechanism. Costs of procuring a Shrinkage expert, their operating costs and the costs of system changes required to enable the introduction of IGT165 and UNC0843 are unknown and uncapped and therefore introduce an unacceptable level of risk.
- **Neutral:** Impact is more likely to be neutral, do not believe there would be an impact on the physical pipe-line system and its operation.

- **Objective B**

- **Negative:** Same as the negative views against A above.
- **Neutral:** Same as the neutral views against A above.

- **Objective C**

- **Negative:** In line with views of the Workgroup.
- **Neutral:** Puts parties in a position where they are subject to new obligations, including procurement of gas, for which current Licence arrangements would not allow. Licence changes would be needed to be undertaken and to have come into effect to allow the full functionality of the Modification. Would extend the time required to implement this Modification as new licence conditions would need to be implemented to support changed requirements. Agree with the Modification Report that there is a neutral impact.

- **Objective D**

- Neutral: The obligation to comply with ISE data requests is on the IGT itself and is unlikely to influence the securing of effective competition between Shippers, Suppliers, and GDNs. Do not see this would have any impact on competition. Agree with the Modification Report that there is a neutral impact.

- **Objective E**

- Negative: While IGT165 is framed with positive intentions around Shrinkage transparency and environmental goals, we do not believe it meaningfully supports either of these two relevant objectives as they are defined in the IGT UNC. In addition, there is no current evidence to support a positive impact on this objective. There is no evidence that this Objective would be better met by the implementation of this Modification. The Proposer has interpreted this Objective as ensuring 'security of supply', however there is nothing in the Modification that specifically improves security of supply.
- Neutral: Given that IGTs have no arrangements for identification nor reporting for IGT Shrinkage, and since the Modification does not introduce any additional measures to manage Shrinkage, we do not feel there is any impact on the stated relevant objective.

- **Objective F**

- Negative: There is already an existing process for Shrinkage and the introduction of the ISE creates a potential dual governance issue as there will be two processes dealing with the issue of Shrinkage. It would be more beneficial if existing processes were reviewed, and improved, rather than pursuing dual governance to address the issue of Shrinkage. This modification would create a duplicate process for management of Shrinkage there would be a challenge with overlapping governance and this would naturally lead to inefficiency. Could have a negative effect as it introduces additional complexity to the code and its implementation of an ISE, particularly given that there isn't currently a method for measuring or reporting Shrinkage.

- **Objective G**

- Negative: While IGT165 is framed with positive intentions around Shrinkage transparency and environmental goals, we do not believe it meaningfully supports either of these two relevant objectives as they are defined in the IGT UNC. In addition, there is no current evidence to support a positive impact on this Objective. IGT165 does not add to the existing Licence conditions that already incentivise transporters to comply with these regulations. There is no evidence presented to show that the new ISE would have a positive impact on Shrinkage or greenhouse gas emissions. The additional complexity and risk that UNC0843 & IGT165 introduce, not to mention the additional Licence changes need to enable them, are more likely to have a negative impact on Parties' ability to comply with relevant regulations.
- Neutral: Even if there were to be a Relevant Objective for Net Zero, this Modification would still lack evidence supporting it through the reduction of Shrinkage and Shrinkage Model Error.

Legal text

One respondent (Shipper) provided no comments on the legal text.

Four respondents agreed that the Legal Text delivers the intent of the Modification, with one respondent highlighting a minor typographical error in Part F1, Clause 5. They highlighted a bracket that is no longer needed and needed removing. The Code Administrator agrees that this bracket does indeed need removing and will reflect this minor update in the drafting presented to the IGT UNC Panel, alongside this Report.

Implementation approach

Four respondents (IGTs and Shipper) agreed with the implementation approach and that IGT165 should be implemented as soon as possible following Authority decision but that the date should also align with the implementation of UNC0843. Respondents cited the importance of aligning the implementation of UNC0843 and IGT165. It was also noted that implementing these Modifications must be led by the Authority's timeline for making the necessary Licence changes and the timeline for procuring and establishing the ISE.

One respondent (NESO) had no comments on the implementation approach as they are not an impacted party.

Impacts and costs

There were no direct costs identified as a result of IGT165. However, there were references to potential unknown future costs, including those that may be associated with procuring, establishing and funding the ISE.

There was also a reference by One respondent (IGT) to the activities associated with providing data to the ISE. However, as the granularity needed is not clear, it is not possible to determine potential costs associated with this activity.

Additional comments

Some respondents provided further comments on the Modification. A summary of their comments is set out below, though we encourage a full review of individual responses:

- The Proposers aim of supporting net-zero and reducing Shrinkage could be achieved more efficiently and cost effectively through the existing Shrinkage arrangements.
- Appreciate the intent to reduce greenhouse gas emissions. However, they urge Panel to consider whether the same objectives could be achieved with simpler means within the IGT code or via existing UNC mechanisms. We respectfully oppose IGT165 as drafted, in favour of a more defined solution.
- There is an already existing process for managing and dealing with Shrinkage – this process could be reviewed, and improved upon, rather than trying to create a new form of governance, with no evidenced benefits.
- UNC0843 is likely to see great costs created for parties involved. These costs are not quantified, nor capped, and would inevitably be carried onto the end consumer, thus increasing their bills, and creating a detriment upon them.
- The introduction of the ISE as a new service provider will necessitate procurement costs, and contract management costs, all of which are currently unquantified, and uncapped. The procurement of the ISE could consequently prove very costly for all parties involved in its funding with no tangible evidence of any benefits.

- The Authority would need to approve the ISC each year, to avoid an ‘enduring ISC’. There is reliance on the Authority to have an annual process on deciding to approve or disapprove of the charges within the ‘formula year’.
- The Modification would require Licence conditions to be amended for GDNs and IGTs to fulfil the obligations that are being placed upon them. The Modification has not accounted for the length of time, nor debate that will happen around these necessary changes.
- Concerned that rather than address any shortcomings in existing processes for the management of Shrinkage, this Modification is seeking to establish an entirely new body. This will incur costs and time to procure the ISE, develop its methodology and establish appropriate governance. These costs are not defined or quantified. The process as set out would require the Authority to approve the ISC each year to ensure it does not simply “roll over” leading to inaccurate charges being apportioned – an outcome this modification is seeking to avoid. There is no discernible evidence that the new ISE would achieve better outcomes in terms of reducing greenhouse gas emissions or lowering consumer bills than could be achieved by a thorough review of current processes, potentially in a shorter time-frame and almost certainly at a lower cost.

Panel discussions and conclusions

August 2025

A Panel member made a reference to the Shipper submitted response and noted that they have indicated support for the implementation of the Modification but support the Workgroup’s views against the Objectives which indicated neutral and negative impacts. The member noted that Code Modifications need to benefit at least one objective and wanted the conflict noted.

The Panel considered all consultation responses and agreed unanimously that no further work was required by the Workgroup and no new issues had been raised.

11 Panel Discussions

Panel discussions on consultation approach (May 2025)

The Code Administrator suggested to Panel members that this Modification could be issued for a consultation for a period of 15 Working Days, to be published on 02 June 25, with a closure date of 23 June 25. The Code Administrator also presented an alternative approach for Panel members to consider, stating that as the UNC0844 consultation is open for an extended period with a closure date of 11 July 25, Panel may wish to extend the IGT165 consultation such that both finish on the same date. The rationale presented for this alternative approach is that due to the related nature of both Modifications, it may be useful for respondents to be able to consider responses for both in parallel.

In considering this, Panel members were split in their approach to the two questions of 1) should the IGT165 consultation be extended beyond the standard 15WDs, and 2) should the end date of the IGT165 consultation be aligned with the end date of the UNC0843 Consultation. Views on this are as below:

1. Should the IGT165 consultation be extended beyond the standard 15WDs?
 No – Two Panel members
 Neutral – Two Panel members
2. Should the end date of the IGT165 consultation be aligned with that of the UNC0843 consultation?

Yes – Three Panel members

Neutral – One Panel member

As a majority of Panel members agreed that the IGT165 consultation should end on the same date as UNC0843 to align with UNC0843's consultation, whilst simultaneously agreeing by majority that the consultation should be no longer than 15WDs, the publication date was therefore agreed to be 15 Working Days prior to the 11th July 2025.

All Panel members agreed unanimously with the Code Administrator's recommendation for the Final Modification Report to be considered by Panel on 29 August 25, in order to align as closely as possible, the Panel consideration dates for IGT165 and UNC0843 (which is currently planned for 15 August 25 UNC Panel).

The Code Administrator asked if Panel members wished to include any additional questions in the IGT165 beyond those which are routinely asked; Panel members did not request any additional questions.

The Code Administrator suggested to Panel members that this Modification could be issued for a consultation for a period of 15 Working Days, to be published on 02 June 25, with a closure date of 23 June 25. The Code Administrator also

12 Recommendations

Panel Determinations

The Panel considered the IGT165 FMR and **unanimously agreed**:

- that IGT165 does not have an impact on any SCRs;
- that IGT165 is an Authority Determined Modification Proposal;
- that impacts and costs set out in the report are accurate and appropriate, and had nothing new to add;
- that IGT165 will have a negative impact on Objectives (A), (B), (E), (F) and (G);
- with the proposed implementation approach;
- that the IGT165 solution delivers the intent of the Modification; and
- that the Legal Drafting delivers the intention of the solution.

The Panel, **by majority**, recommend to the Authority that:

- IGT165 should not be implemented.

Panel quoracy

A Panel member asked the Code Administrator to highlight within this document that the IGT UNC Panel is currently not quorate.

Code quoracy rules stipulate that at least two IGT and two Shipper members must be in attendance for a meeting of the Panel to be quorate. However, where a meeting of the Panel has been opened, and is

deemed to be non-quorate. A reconvened meeting can take place, at which (regardless of quorate rules), Panel business can take place as per Code rules (Part L6.10).

It should be noted that any decision made by the Panel at a reconvened meeting stands as per Code Rules.