

## IGT UNC Modification Panel Meeting

### Draft Minutes

Friday 31<sup>st</sup> October 2025

Via teleconference

| Attendee        | Initials | Organisation  | Representing       | Notes                          |
|-----------------|----------|---------------|--------------------|--------------------------------|
| Anne Jackson    | AJ       | Talan         | Code Administrator | Chair                          |
| Aleksis Butler  | AB       | BUUK          | Observer           | Proposer for IGT178 and IGT179 |
| Eilidh McGrevey | EM       | Last Mile Gas | Pipeline Operators |                                |
| Ellie Osobina   | EO       | Ofgem         | Authority          |                                |
| Jenny Rawlinson | JR       | BUUK          | Pipeline Operators |                                |
| Lee Greenwood   | LG       | Centrica      | Pipeline Users     |                                |
| Paul McKie      | PM       | Joint Office  | Observer           |                                |
| Richard Welsby  | RW       | Last Mile Gas | Observer           |                                |
| Talia Lattimore | TL       | Talan         | Code Administrator |                                |
| Harry Firth     | HF       | Talan         | Code Administrator | Secretariat                    |

### 1. Welcomes and Apologies

The Chair welcomed the Panel to the reconvened meeting. The Chair noted that following the ongoing quoracy issues the Panel faces, the Code Administrator (CA) had opened a meeting prior to this and held that open for one hour as per Code rules (Part L6.10).

There were apologies from Cher Harris (CH) (Indigo Pipelines) and Graeme Forbes (GF) (Talan).

### 2. Confirmation of Agenda

The Chair confirmed the items for discussion as outlined in the final agenda. The Panel were invited to add any items for Any Other Business (AOB). Talia Lattimore (TL) added Item 12 - Proposed IGT UNC 2026 Release Dates and Jenny Rawlinson (JR) added Item 13 – Cross Code Digitalisation Steering Group (CCDSG) Update.

### 3. Approval of the previous minutes (25-09 and 25-09 Reconvened)

The CA invited comments on the September 2025 meeting minutes noting that no comments had been received prior to the meeting. One comment was raised by Ellie Osobina (EO), correcting an error on the expected decision date for [IGT176 - Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#). They advised to expect Ofgem's decision on IGT176 to be made by the end of November, rather than the end of October. No further comments were raised during the meeting, and the minutes (both standard and reconvened meetings) were approved as a true and accurate account of the meetings.

#### 4. Outstanding Actions

The Panel were informed that there were no outstanding actions.

#### Modification Business

##### 5. IGT178 - PC4 Read Submission Window Extension

TL took the Panel through the Final Modification Report (FMR). TL explained that IGT178 seeks to align the IGT UNC with [UNC 0884 - Extending the PC4 Read Submission Window](#), which was approved for implementation by Ofgem earlier in the month. The Modification proposes to mirror the extended read submission windows introduced under UNC 0884, which allows for more flexibility in submitting reads for both domestic and non-domestic premises. The IGT UNC currently specifies a fixed window of 25 Supply Point System Business Days (SPSBD) for Product Class (PC) 4 for submission of Must Reads by transporters, which does not dynamically reflect changes in the UNC. To resolve this, the Modification proposes replacing the fixed reference with a cross-reference to Section M of the UNC Transportation Principal Document (TPD).

#### Consultation Responses

TL advised that four responses had been received to the IGT178 consultation, two responses from IGTs, one from a Shipper and one from NESO. TL advised that all responses:

- supported IGT178 being progressed as an Authority Decision Modification;
- agreed that IGT178 had a positive impact on Objective (F)' and
- that the Legal Text delivered the intent of the Solution.

TL added that three of the responses had agreed with the proposed implementation approach and the identified impacts and costs, while NESO had no comment on either as they are not an impacted party.

TL advised that all consultation responses had supported the implementation of the Modification, with responses highlighting that IGT178 will further align the IGT UNC with the UNC following the forthcoming implementation of UNC 0884 and help prevent non-compliance. The responses also added that extending the submission window for PC4 will mean additional read submissions will be permitted, enhancing settlement accuracy.

The Panel had no comments to add on the consultation responses.

#### Governance

TL advised that the Proposer originally suggested that IGT178 be subject to an Authority Decision, in line with UNC 0884, which Ofgem have recently approved. LG asked whether the fact Ofgem have already approved UNC 0884 changes the bearing for IGT178 being subject to an Authority decision. JR agreed and suggested that IGT178 does meet the criteria for a Self-Governance Modification but

was progressed as an Authority Decision Modification so as to be uniform with UNC 0884. They asked EO for their view on the IGT UNC Panel potentially changing IGT178 to a Self-Governance Modification. EO responded that the Modification must be assessed on its own merits and not just be automatically subjected to the same governance route as UNC 0884 or another linked Modification. EO added that they would not be able to provide a definitive answer, but added that if IGT178 met the Self-Governance criteria, then the decision to change the governance route can be made by the Panel.

The Chair reminded the Panel of the Self-Governance criteria. AB shared the justification for Authority Decision for UNC 0884 with the Panel, from the Modification Report. TL acknowledged this rationale but added that it was important for the Panel to assess IGT178 on its own merit, as suggested by EO. The Chair advised the Panel that UNC 0884 will have been automatically applied in the IGT UNC following implementation, as the IGT UNC directly references the sections of the UNC that were changed by the Modification. The Chair added that the only outstanding change is to remove the hardcoded 25 business day window for must read submissions.

The Chair and JR discussed the impacts of UNC 0884 and IGT178 on IGT UNC parties, particularly the extension in time for when an IGT is notified that a must read is due. They asked LG from a Shipper perspective if they felt IGT178 has a material impact. LG responded that they felt this Modification does not meet the criteria for an Authority decision and therefore should be Self-Governance.

The Panel unanimously decided that the governance route for IGT178 should be changed from an Authority decision to Self-Governance.

#### Solution

TL took the Panel through the proposed solution, noting that no comments were raised on the solution in the consultation responses.

The Panel agreed unanimously that no further work was required on the solution.

#### Impacts

TL advised that the Proposer and Workgroup had agreed that there were no identified impacts on any Significant Code Reviews (SCRs) or significant industry change projects. They added that the consultation responses had also agreed there were no impacts. The Panel agreed that there were no expected impacts on an SCR or significant industry change project, although noted that the further marrying up of the UNC and IGT UNC will have a positive impact on the Code Reform program and Code consolidation.

TL advised that the Proposer and Workgroup were aligned on the consumer impacts. The Proposer had initially identified a positive impact on lower consumer bills due to improved accuracy in meter reads, but it had been discussed at the Workgroup that more accurate meter reads could potentially lead to higher consumer bills, and that a positive impact on the improved quality of service would be more accurate, which the Proposer had agreed with. TL added that the consultation responses had also agreed with the identified consumer impacts. The Panel agreed that there was no further work required.

The Panel reviewed the Workgroup discussions on cross-Code impacts and environmental impacts and agreed that no further work was required.

The Panel unanimously agreed with the Proposer, Workgroup and consultation responses that there is a positive impact on Relevant Objective (F) - Promotion of efficiency in the implementation and administration of the Code for the reasons set out within the report.

#### Implementation

TL advised that the Workgroup had recommended for IGT178 to be implemented alongside UNC 0884 and should only be implemented if UNC 0884 is. TL noted that the related XRN 5906 has a proposed implementation date of February 2026, though this is subject to change following approval under the DSC change process.

TL advised that all consultation responses had agreed with the proposed implementation approach.

JR asked for a reference to XRN 5906 to be included within the Notice of Implementation (NOI). TL advised that references to this and the UNC Modification will be included within the NOI. The Panel unanimously agreed with the proposed implementation approach.

#### Legal Text

TL advised that no comments were raised in the consultation responses on the legal text. The Panel agreed that the legal text delivered the intent of the solution.

#### Determinations:

The Panel **unanimously** agreed:

- that IGT178 does not have an impact on any SCRs or significant industry change projects;
- that IGT178 is a Self-Governance Modification Proposal;
- that the impacts and costs set out in the report are accurate and appropriate;
- that IGT178 will have a positive impact on Objective (F);
- with the proposed implementation approach;
- that the IGT178 solution does not need further development; and

- that the Legal Drafting delivers the intention of the solution.

The Panel **unanimously** agreed that:

- IGT178 should be implemented.

## 6. [IGT179 - NExA Tables Clarification Update and Related Documents](#)

TL took the Panel through the FMR. TL explained that IGT179 aims to clarify the publication of Network Exit Agreement (NExA) tables and correct errors in variance reporting. The Modification includes updates to Ancillary Documents, specifically the NExA Connection System Exit Point (CSEP) Ancillary Agreement and the NExA Procedures Document, to improve clarity and ensure accurate representation of data.

TL explained that while the NExA values published and accepted for use in Code from February 2026 were correct, the accompanying variance information published earlier in the year was inaccurate. The Modification seeks to prevent future confusion by clearly defining the applicable dates and context for each table.

### Consultation Responses

TL advised that four responses had been received to the IGT179 consultation, two responses from IGTs, one from a Shipper and one from NESO. TL advised that all responses:

- supported IGT179 being progressed as a Self-Governance Modification;
- agreed that IGT179 had a positive impact on Objective (F); and
- that the Legal Text delivered the intent of the Solution.

TL added that three of the respondents agreed with the proposed implementation approach and the identified impacts and costs, while NESO had no comment on either as they are not an impacted party.

TL advised that all consultation responses had supported the implementation of the Modification, with responses highlighting that IGT179 provides clarity that was missing from the NExA tables and relevant documents related to the AQ review process, and this extra clarity will ensure those involved in the AQ review process will have a stronger comprehension of relevancy of tables and dates.

The Panel had no comments to add on the consultation responses.

### Governance

TL advised that the Proposer had recommended that the Modification be treated as a Self-Governance Modification Proposal, as the Modification does not introduce new obligations or

governance changes. The Panel unanimously agreed that IGT179 continues to meet the criteria for a Self-Governance Modification Proposal.

#### Solution

TL took the Panel through the proposed solution, advising that no problems with the solution were raised by the consultation responses.

The Panel agreed unanimously that no further work was required on the solution.

#### Impacts

TL advised that the Proposer and Workgroup had agreed that there were no identified impacts on any SCRs or significant industry change projects. They added that the consultation responses had also agreed there were no impacts. The Panel agreed that there were no expected impacts on an SCR or significant industry change project.

TL advised that the Proposer, Workgroup and consultation responses had all agreed that there were no identified consumer impacts. The Panel agreed that no further work was required.

The Panel reviewed the Workgroup discussions on cross-Code impacts and agreed that no cross-Code impacts were identified and there were no environmental impacts. The Panel agreed that no further work was required.

The Panel unanimously agreed with the Proposer, Workgroup and consultation responses that there is a positive impact on Relevant Objective (F) - Promotion of efficiency in the implementation and administration of the Code for the reasons set out in the report.

#### Implementation

TL advised that the Proposer had originally targeted the November 2025 standard IGT UNC Release as an implementation date but added that this was not possible due to the 15 Working Day Appeal Window associated with Self-Governance Modification approval. TL advised the Panel had suggested in the September meeting that the proposed implementation date should be “as part of the next available IGT UNC release.” This approach would allow for implementation as soon as possible. TL advised that the current timetable would see this Modification going into the February 2026 Release. The Chair added that this would see the changes implemented before the AQ review process begins next year. The Panel unanimously agreed with the proposed implementation approach.

#### Legal Text

TL advised that no comments were raised in the consultation responses on the legal text. The Panel agreed that the legal text delivered the intent of the solution.

#### Determinations:

The Panel **unanimously** agreed:

- that IGT179 does not have an impact on any SCRs or significant industry change projects;
- that IGT179 is a Self-Governance Modification Proposal;
- that the impacts and costs set out in the report are accurate and appropriate;
- that IGT179 will have a positive impact on Objective (F);
- with the proposed implementation approach;
- that the IGT179 solution does not need further development; and
- that the Legal Drafting delivers the intention of the solution.

The Panel **unanimously** agreed that:

- IGT179 should be implemented.

#### Authority Updates

##### **7. Authority Update**

EO provided Panel members with the following updates:

Following Ofgem's 2024 joint consultation with DESNZ, they confirmed that code managers will need to:

- Include performance indicators in their codes, and
- Publish annual reports on how they're performing against these.

Ofgem asked Elexon and RECCo to help us develop initial metrics, which they've been refining together. These will inform proposals Ofgem plan to consult on in due course.

To support this, Ofgem held a stakeholder workgroup on 23 September to test the draft metrics.

Feedback from that session will help Ofgem improve them ahead of consultation, where there'll be further opportunity to input.

##### **8. Ofgem's Expected Decision Dates (EDD)**

EO confirmed there are currently two IGT UNC Modifications awaiting an Authority decision on the EDD table. EO advised that:

- There is no current expected decision date for [IGT165 - Independent Shrinkage Expert and Independent Shrinkage Charge](#). However, Ofgem are hoping to make a decision prior to the end of 2025. Though this is subject to change.

- There is an expected decision date for [IGT176 - Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#) of 30 November.

EO advised that the web address for Ofgem's EDD register has changed and can now be accessed [here](#).

## **AOB**

### **9. Code Consolidation**

The Chair and PM provided an update on efforts to coordinate Code Consolidation. The Chair advised that the Code Administrator and Joint Office are considering holding joint working groups to support consolidation, particularly for Modifications affecting both the UNC and IGT UNC Codes. Ofgem has met with representatives from both the Joint Office and IGT UNC and expressed support for collaborative efforts. PM added that work is being scoped into short, medium, and long-term actions, including those that may be required once the Gas Code Manager license is awarded. The Chair added that regular check-ins with Ofgem are planned to ensure alignment and avoid duplication.

JR added that BUUK will be attending an informal working group co-ordinated by Cadent next week, primarily to agree the group terms of reference and noted that no further updates are available on the group since the September IGT UNC Panel meeting.

### **10. UNC 0854 IGT UNC Equivalent Modification**

The Chair raised concerns about the lack of a sponsor for the IGT UNC equivalent of [UNC 0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#). They added that the CDSP have expressed concern in multiple IGT UNC Workgroups that system changes may exclude IGT implications or consequences if the equivalent Modification is not raised. JR advised that Xoserve had raised this issue at the latest INA Regulatory Subcommittee meeting, but no IGT volunteered to sponsor. JR added that Xoserve intent to escalate the matter to the INA Board in November. JR added that BUUK offered to sponsor the modification if no other IGT steps forward but noted the need for broader support, as BUUK have raised five of the last six IGT UNC Modifications.

### **11. November 2025 IGT UNC Release**

TL confirmed that there will not be a November 2025 release in the IGT UNC.

### **12. Proposed IGT UNC 2026 Release Dates**

TL confirmed the current proposed dates for the three standard IGT UNC releases in 2026 are 27th February, 26th June and 6th November 2026. TL advised that these dates are based upon Xoserve's proposed release dates and will be subject to change as they require approval under the DSC change

process. TL advised that they will shortly update the IGT UNC Releases page to provide advanced notice of the current target dates.

### **13. Cross Code Digitalisation Steering Group (CCDSG) Update**

JR provided an update from the latest CCDSG meeting. They advised that Ofgem confirmed their decision that the obligation to apply Data Best Practice (DBP) will be placed on the Gas licensees, rather than the GNC Code Manager, as had been suggested. Ofgem feel that the gap is too great before the appointment of the Code Manager, and they don't want to lose time when this could be being applied.

JR added that Ofgem are planning to put out a decision document shortly and then a second consultation will be issued in a few weeks/months. The second consultation (and decision document) will include the transfer of obligations for gas on the Code Administrator, rather than Panel. This is likely to push out the Ofgem timeline for at least 6 months. JR advised that this means that the gap between the obligation on licensees and the Code Manager being in place is being greatly reduced. JR added that the CDSP are looking at bringing together the gas transporters to discuss the implications of DBP.

JR confirmed that the next CCDSG meeting is scheduled for Tuesday 4<sup>th</sup> November.

**The next IGT UNC Panel meeting is scheduled for Friday 28<sup>th</sup> November 2025.**

### Annex 1 – Actions Table

| Reference                                  | Action | Owner | Status |
|--------------------------------------------|--------|-------|--------|
| There are currently no open Panel actions. |        |       |        |

DRAFT