

## IGT UNC Modification Panel Meeting

### Draft Minutes

Friday 28th November 2025

Via teleconference

| Attendee        | Initials | Organisation     | Representing       | Notes                       |
|-----------------|----------|------------------|--------------------|-----------------------------|
| Anne Jackson    | AJ       | Talan            | Code Administrator | Chair                       |
| Alison Beard    | AB       | Talan            | Code Administrator |                             |
| Aleksis Butler  | ABU      | BUUK             | Observer           | Proposer for RG008          |
| Bradley Wood    | BW       | Centrica         | Pipeline Users     | Alternate for Lee Greenwood |
| Cher Harris     | CH       | Indigo Pipelines | Pipeline Operators |                             |
| David Addison   | DA       | Xoserve          | Observer           | Present for Item 10 only    |
| Eilidh McGrevey | EM       | Last Mile Gas    | Pipeline Operators |                             |
| Ellie Osobina   | EO       | Ofgem            | Authority          |                             |
| Graeme Forbes   | GF       | Talan            | Code Administrator |                             |
| Gerallt Hughes  | GH       | DESNZ            | Observer           | Present for Item 10 only    |
| Jamie Maule     | JM       | Ofgem            | Authority          | Present for Item 10 only    |
| Jenny Rawlinson | JR       | BUUK             | Pipeline Operators |                             |
| Natasha Brown   | NB       | DESNZ            | Observer           | Present for Item 10 only    |
| Paul McKie      | PM       | Joint Office     | Observer           |                             |
| Richard Welsby  | RW       | Last Mile Gas    | Observer           |                             |
| 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 Lee Greenwood (LG) (Centrica) and Talia Lattimore (TL) (Talan). It was noted that Bradley Wood (BW) was acting as an alternate for Lee Greenwood (LG).

### 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). Jenny Rawlinson (JR) added Item 11 - Cross Code Digitalisation Steering Group Update and the Chair added Item 12 – Eilidh McGrevey Panel Term.

### 3. Approval of the previous minutes (25-10 and 25-10 Reconvened)

The CA invited comments on the October 2025 meeting minutes noting that one comment had been received prior to the meeting from JR, clarifying that the Independent Networks Association (INA)

Regulatory Subcommittee Chair had proposed to escalate the matter of finding a sponsor for an IGT UNC equivalent Modification to [UNC 0854](#) to the INA Board. No comments were raised during the meeting, and the minutes (both standard and reconvened meetings) were approved as a true and accurate account of the meetings.

#### **4. Outstanding Actions**

The Panel were informed that there were no outstanding actions.

#### **Modification Business**

##### **5. [RG008 – IGT UNC Code Review in preparation for Code Manager and Code Consolidation](#)**

Aleksis Butler (ABU) took the Panel through the Review Request Form. JR and ABU explained that RG008 has been raised in anticipation of the appointment of a Licensed Code Manager and the upcoming Code consolidation of the IGT UNC and UNC into the Unified Gas Network Code (UGNC). ABU added that the aim of the Review is to ensure the IGT UNC is comprehensively assessed to ensure the Code is ready for consolidation, by conducting a line-by-line review of the Code and any related guidance and ancillary documents.

ABU outlined some key areas of focus for the Review Group, including corrections of any current errors in the IGT UNC, such as grammar or outdated references to the UNC. ABU stressed the importance of ensuring that IGT-specific governance provisions are preserved or appropriately adapted, and how IGT UNC governance interacts with the UNC, especially as some UNC Modifications may impact the IGT UNC.

ABU took the Panel through the proposed Terms of Reference (ToR) for the Review Group and suggested that these ToR may evolve based on initial Review Group discussions, or at the request of Ofgem. The Panel agreed.

Ellie Osobina (EO) highlighted Ofgem's interest in governance provisions, considering that Ofgem will be leading on some of the Code consolidation work directly, and encouraged ongoing dialogue with the Code Reform team. ABU confirmed the intention to keep Ofgem involved and to open the Review Group to all interested parties for broad participation.

Graeme Forbes (GF) suggested the idea of a broader event or forum to map out all ongoing Code reform and consolidation activities, ensuring visibility and reducing siloed efforts. They added that this would include UNC and Ofgem representatives, noting the work being currently undertaken by both parties. JR and EO supported this idea.

Paul McKie (PM) suggested that BUUK raise an identical Review request in the UNC, so that the UNC and IGT UNC can form a combined Review Group and work in harmony on the requirements for Code consolidation rather than in isolation. JR responded that the focus of RG008 is to tidy up the IGT UNC Code in preparation for consolidation, including the focus on IGT-specific processes. They noted that similar housekeeping work is underway in the UNC.

JR asked EO whether to expect the appointment of the Licensed Code Manager for the UGNC before or after the Code consolidation process has started. EO responded that they would refer the exact timeline question to their Ofgem colleagues who will be meeting with BUUK next week to discuss RG008 and Code consolidation in further detail.

#### Determinations:

The Panel **unanimously** agreed that:

- RG008 should be progressed to a Review Group for assessment.

The Chair advised that the introduction of the Review and discussion on the Review Group ToR will be discussed at the December 2025 Workstream meeting. ABE added that in the event of other Modification business limiting the time to discuss RG008 in the scheduled Workstream meetings, the Code Administrator can schedule ad hoc Review Group meetings, noting that RG008 will likely include attendees who are only interested in this Review.

**POST-MEETING NOTE:** *The Proposer of RG008 is unable to attend the December 2025 Workstream meeting, so the Review will be introduced at the January 2026 Workstream meeting instead.*

#### Authority Updates

##### **6. Authority Update**

EO provided Panel members with the following updates:

Ofgem have published a [statutory consultation](#) on Modifications to industry Codes to implement the harmonised Code Modification prioritisation process. This follows Ofgem's decision on the preliminary Strategic Direction Statement (SDS) and governance arrangements for industry Codes published in August 2025, when Ofgem decided to proceed to this statutory consultation. Building on previous industry engagement and publications, this statutory consultation provides opportunity to offer feedback on Ofgem's policy proposals, proposed guidance documents and proposed legal code text changes. This is ahead of Ofgem's intent to publish their decision in early 2026, subject to the outcome of this consultation. Therefore, Ofgem advise stakeholders with views on the consultation that it is important to submit a response to this consultation. Ofgem believe that the proposals will support industry in dedicating time and resource to focus on higher priority Modifications. It will also

support transition towards reformed Code governance arrangements and the implementation of the SDS.

This publication will explore four key policy areas that underpin the proposed harmonisation prioritisation process.

- A new prioritisation process.
- Prioritisation criteria and categories, definitions, interpretations, and how these should be applied to prioritisation determinations.
- Prioritisation governance, changes to the governance of prioritisation determinations including reviews and appeals.
- Policy implementation, how the new policy will interact with existing prioritisation processes.

Please send your responses to [industrycodes@ofgem.gov.uk](mailto:industrycodes@ofgem.gov.uk) by 12th January.

As with previous years, Ofgem will have in place a publishing moratorium over the festive period. The last publishing day will be Friday 12<sup>th</sup> December 2025 and Ofgem will begin to publish documents again as normal on Monday 5<sup>th</sup> January 2026.

## 7. 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 an expected decision date of 30<sup>th</sup> January 2026 for [IGT165 - Independent Shrinkage Expert and Independent Shrinkage Charge](#).
- There is an expected decision date of 30<sup>th</sup> November 2025 [IGT176 - Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#). This decision will be published on Monday 1<sup>st</sup> December.

**POST-MEETING NOTE:** *Ofgem published their decision to approve IGT176 for implementation on Monday 1<sup>st</sup> December.*

## AOB

### 8. **Code Consolidation Update**

GF advised that most of the updates on Code Consolidation have been provided under the items on RG008 and the Gas Shipper Obligation (GSO) Update. They reiterated the importance of all key parties involved in the Code consolidation process coming together to establish a common roadmap, to ensure transparency and alignment between these key parties and all impacted stakeholders.

JR provided an update on the Cadent-led working group involving Transmission and Gas Transporter (GT) parties. They advised that there has not been a meeting held since the last IGT UNC panel, but other progress has been made. Representatives from Transmission and the GTs have met with Ofgem and a letter has been drafted to Ofgem from Transmission, GTs, Encodar and Xoserve setting out the intentions of this working group to jointly design a proposal for the UGNC Manager Model. The ultimate aim for the model is to be tested with wider Gas Network Code constituencies right across the board before being shared with Ofgem for consideration as part of the expressions of interest process. The rationale behind the particular parties being involved is due to relevant licence obligations that both Transmission and the GTs have in terms of the Network Code. The intention is to undertake collaboration with all parties essential to the current operations of both current Gas Network Codes. These discussions will involve Shippers, albeit not necessarily as part of the working group.

JR advised that BUUK raised this matter at this week's Independent Networks Association (INA) meeting to make other IGTs aware and have received some feedback and support from other IGTs.

#### **9. UNC 0854 IGT UNC Equivalent Modification Update**

The Chair provided an update on the proposed IGT UNC equivalent of [UNC 0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#). They noted that UNC 0854 has already been implemented in the UNC and that the Code Administrator has been working with the INA to establish whether an IGT UNC equivalent Modification is required. They have determined that the Transmission Modification works for IGTs as they will be charging for gas that passes through the IGT networks. The Chair added that final checks are ongoing to determine whether IGT Supply Point level data is required by the Transmission proposal.

The Chair advised that another matter is whether IGTs want to have the same facility to enable charges to Suppliers in the event that a Shipper is sanctioned or suspended. They advised that current provisions in the IGT UNC allow IGTs to do this when a Shipper is terminated, but a tweak to the Code may be required to allow for when a Shipper is sanctioned or suspended instead. JR and the Chair agreed that "suspending" a sanctioned Shipper is preferable to termination, as it will allow IGTs to charge Suppliers whilst the Shipper is sanctioned, and then for IGTs to resume business with said Shipper once sanctions are lifted. The Chair added the work is ongoing with the INA's agreed proposer and Xoserve to determine what would be required in a potential Modification.

#### **10. Gas Shipper Obligation Update**

NB provided an overview of the GSO to the Panel. NB explained that the GSO is designed to provide long-term funding for hydrogen production projects under the Hydrogen Production Business Model, with the Low Carbon Contracts Company (LCCC) expected to administer the scheme. The GSO will operate as a volumetric levy, charging Shippers in proportion to the quantity of gas shipped, and will

rely on data from Xoserve. The government response to the GSO consultation is expected by the end of the year, finalising policy details.

NB outlined a two-step modification process: an initial implementation/testing phase allowing Xoserve to share data with LCCC for system validation before regulations are in force, followed by an enduring modification for ongoing data sharing and cost recovery once the GSO is operational. The first modification will include a sunset clause, and the second will align with the final regulations.

JR asked about the nature of costs recovered from Shippers. NB clarified that Xoserve will recover its own operational and implementation costs directly from Shippers, while LCCC will bill Shippers for GSO payments. DA confirmed that they expect that the NTS exit commodity charge, including the IGT component, will be used for the levy, and that IGTs will not need to take additional action for their sites. This is subject to the final position in the government response to the GSO consultation.

The Chair asked about requirements for shippers to recover costs from suppliers. NB responded that while the expectation is for costs to be passed through to Suppliers and ultimately Consumers, the government cannot dictate commercial arrangements.

NB requested a proposer for the required IGT UNC modification, and JR volunteered BUUK to sponsor it. DA offered support in drafting the IGT UNC modification, leveraging the existing UNC proposal. PM suggested that a combined work group for UNC and IGT UNC modifications would be efficient, given the alignment required between the codes. The Chair agreed.

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

GF and JR provided an update from the latest CCDSG meeting. They advised that the group, originally driven by Ofgem, is transitioning to industry control, with Terms of Reference being updated. The group agreed to continue in its current form to leverage existing expertise and discussions, and Ofgem's continued attendance was requested to ensure alignment with broader Code reform.

GF has provided the Code Administrator with the minutes taken from the last CCDSG meeting and these minutes will be published on the IGT UNC website page for the November 2025 Panel meeting.

#### **12. Eilidh McGrevey Panel Term**

The Chair reminded the Panel that this was EM's last Panel meeting as a Pipeline Operator Representative. They added that RW will be starting their term at the December IGT UNC Panel meeting. The Panel thanked EM for their time as member and wished them well for the future.

**The next IGT UNC Panel meeting is scheduled for Friday 19<sup>th</sup> December 2025.**

### Annex 1 – Actions Table

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

DRAFT