

IGT UNC Modification Panel Meeting

Final Minutes

Friday 29th August 2025

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Talan	Code Administrator	Chair
Aleksis Butler	AB	BUUK	Observer	Proposer for IGT177, IGT178 and IGT179
Eilidh McGrevey	EM	Last Mile Gas	Pipeline Operators	
Ellie Osobina	EO	Ofgem	Authority	
Graeme Forbes	GF	Talan	Code Administrator	
Jenny Rawlinson	JR	BUUK	Pipeline Operators	Alternate for Cher Harris
Lee Greenwood	LG	Centrica	Pipeline Users	
Nick King	NK	CNG Services	Observer	Proposer for IGT176
Paul McKie	PM	Joint Office	Observer	
Paul Witton-Dauris	PWD	Talan	Code Administrator	
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). It was noted that Jenny Rawlinson (JR) was acting as alternate to CH.

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).

3. Approval of the previous minutes (25-07 and 25-07 Reconvened)

The CA invited comments on the July 2025 meeting minutes noting that no comments had been received prior to the meeting. 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 was one outstanding action:

25/07 – 01: Code Administrator to request feedback from IGT UNC parties on draft response to Ofgem Data Best Practice Consultation.

HF confirmed that the Code Administrator had asked for feedback on the draft consultation response from IGT UNC parties as per the request of the Panel at the July meeting. They added that one comment was received and a minor amendment was made to the draft response as a result, which was approved by Panel members. HF confirmed that the consultation response had been submitted to Ofgem ahead of the deadline of 11th August.

The Chair added that the legal drafting proposed by Ofgem did not fully align with the gas governance framework under the licence, and this had been highlighted in the covering letter.

Action closed.

Modification Business

5. IGT165 - Independent Shrinkage Expert and Independent Shrinkage Charge

TL took the Panel through the Final Modification Report (FMR) and consultation responses for IGT165. They reminded the Panel that this Modification seeks to align the IGT UNC with [UNC 0843](#) by introducing provisions for an Independent Shrinkage Expert (ISE) and an Independent Shrinkage Charge (ISC). The Modification includes two business rules: the first ensures that there is no conflict within the IGT UNC that would prevent jurisdiction over IGT pipelines and parties in relation to the ISE; the second enables the submission of required data to the ISE, which will in turn ensure that IGT Supply Point level data, which falls under the remit of the IGT UNC, can be provided should the ISE require it.

Consultation

TL took the Panel through the consultation responses. They advised that five consultation responses were received. One Shipper supported the implementation of the Modification but agreed with the Workgroup's view that the Modification did not positively impact the Relevant Objectives. The remaining four respondents, including three IGTs and the National Energy System Operator (NESO), opposed the implementation of the Modification. Their concerns included the complexity of the proposal, the potential for unknown costs, and the lack of clarity regarding the benefits. Some respondents questioned whether the Modification was the most direct approach to addressing Shrinkage issues and suggested that existing mechanisms should be reviewed first. All of the respondents supported the Modification being subject to an Authority decision. JR queried the respondent in support of the Modification but also mirroring the Workgroup's view of the Modification negatively impacting the Relevant Objectives. TL confirmed that they reached out to the party following review of their response as their support for implementation seemed to be in conflict with their view that the mod has negative impacts on the Objectives. TL referenced the additional context added to the consultation response section of the FMR. This was added with agreement from the respondent. The respondent felt that whilst they supported implementation the views expressed by the Proposer were not necessarily strong enough.

TL also noted the range of responses from the consultation regarding the Relevant Objectives and presented a table with all the different views, which has been included in the FMR. JR responded that

the table presents the range of views effectively and added that they had nothing to add. Other Panel members agreed.

The Panel agreed that after considering all consultation responses, that no further work was required by the Workgroup and there were no new issues identified.

Legal Text

TL advised that one comment had been made on the legal text from a respondent to the consultation, which identified a minor typographical error. No further comments were received and the Panel agreed that the legal text fulfilled the intent of the Solution.

Governance

The Panel agreed with the views of the Workgroup and all consultation responses that IGT165 should remain subject to an Authority decision.

Solution

After reviewing the consultation responses, the Panel agreed that no further work is required by the Workgroup on the Solution.

Impacts

TL noted that the Workgroup had previously considered whether Code Reform would be impacted but had decided that Ofgem would be in the best position to determine this as part of the Authority decision. The Panel agreed with the views of the Workgroup and all consultation responses that there are no impacts on a Significant Code Review (SCR) or other significant industry change project.

TL noted the differences in the views of the Proposer and Workgroup on Consumer impacts. This included the Proposer identifying positive benefits for improved safety and reliability, lower bills, reduced environmental damage and benefits to society, whilst the Workgroup identified a neutral impact. The Panel considered the Consumer impacts identified by the Proposer and Workgroup and had nothing further to add.

TL noted that the Panel had previously agreed with the Workgroup that although there is no direct cross-Code impact on the UNC, the link between the two Modifications was worth highlighting. JR questioned the cross-Code impact and queried whether IGTs would have to adhere to the data requests of the ISE if IGT165 was not implemented. The Chair responded that IGTs would still have to adhere to the ISE, but the relationship would be impeded. JR raised a question regarding the governance of the Independent Gas Transporter Arrangements Document (IGTAD). The Chair confirmed that the IGTAD details the relationship between IGTs and Gas Distribution Networks (GDNs) but is governed under the UNC. The Panel agreed that no further work is required on cross-Code impacts.

The Panel noted the previous discussions that had taken place on the environmental impacts and the costs identified in the Rough Order of Magnitude (ROM) for UNC0843 and agreed that no further work is required in either area.

Objectives

TL took the Panel through the views of the Workgroup and the Proposer on the Relevant Objectives, and the differing views voiced both from the Workgroup and in the consultation responses. The Panel considered all consultation responses and agreed unanimously with the Workgroup's views on the Objectives and that this Modification will have an impact on the Objectives as follows: Objectives (A), (B), (E), (F) and (G) all negative, the rest neutral.

Implementation

TL advised that pre-consultation, the implementation approach agreed by Panel and Workgroup was that IGT165 should be implemented at the same time as UNC 0843 and should only be implemented if UNC 0843 is implemented, and when the required Licence changes are put in place. The Panel agreed with the proposed implementation approach.

Recommendations

The Panel **unanimously** agreed that:

- 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 Relevant Objectives (A), (B), (E), (F) and (G);
- with the proposed implementation approach; 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.

LG advised that they were in support of IGT165 being implemented. JR advised that both they and, on behalf of, CH were not in support of IGT165 being implemented. EM also advised that they were not in support of IGT165 being implemented. LG asked for it to be recorded that this Panel meeting is not quorate as part of the recommendation to Ofgem. TL confirmed that this context will be added in the FMR.

6. IGT176 – Changes to IGT UNC to enable UNC0887 ‘Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS’

TL took the Panel through the Final Modification Report. TL explained that IGT176 is an enabling Modification for [UNC 0887 - Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS](#).

Consultation

TL took the Panel through the consultation responses. They advised that seven consultation responses were received. TL advised that five responses supported the Modification being subject to an Authority decision, although one of these, a Shipper, initially felt that the Modification met the Self-Governance criteria, but acknowledged that the linked Modification UNC 0887 had been subject to an Authority decision and that it made sense for IGT176 to follow suit. TL added that the other two respondents, biomethane producers, had supported Self-Governance, with one respondent stating that the Modification is not significant enough to warrant engagement from Ofgem.

TL advised that all respondents supported the implementation of the Modification. They added that all respondents identified a positive impact on relevant Objective (D), four respondents identified positive impacts on (A), three identified positive impacts on (B), and two on (F). No negative impacts were identified. There were no issues highlighted with the potential implementation approach, although one respondent identified a need for rapid implementation in order for biomethane producers to be able to take advantage of industry schemes such as the Green Gas Support Scheme. TL added that only one respondent identified any costs associated with the implementation of IGT176, which was the cost to a biomethane producer to employ an IGT, so no costs were identified to IGT UNC parties. A biomethane producer also identified a new benefit regarding a potential to reduce the land area required (for pressure changing plant) as part of the implementation of the Modification, thus reducing their costs.

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.

Solution

The Panel agreed unanimously that no further work was required by the Workgroup.

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 noted that a potential impact on the ongoing Code Reform project had been discussed, but this would be up to Ofgem to fully consider when submitted to them as an Authority Decision Modification. The Panel agreed that there were no expected impacts on an SCR or significant industry change project.

TL advised that the Proposer and Workgroup's views were aligned on Consumer benefits, and both had identified positive impacts on reduced environmental damage and benefits for society as a whole.

TL added that the benefits aligned with those identified in UNC 0887. The Panel agreed with the Proposer and Workgroup's identified Consumer impacts and felt sufficient debate had taken place in the Workgroup.

TL advised that while the Workgroup Report indicated a cross-Code impact on the UNC the Workgroup had not identified any direct impact to the Code that would require any action by the UNC. TL added that discussions had taken place, and it was decided that highlighting the dependency of IGT176 being implemented to enable the full delivery of UNC 0887 warranted a tick in the box within the reports table. The Panel agreed with the Workgroup's view.

TL advised that the Workgroup had agreed with the Proposer's view that IGT176 will have positive environmental impacts. The Panel agreed with the Proposer and Workgroup.

TL advised that the Proposer and Workgroup had been aligned on the Relevant Objectives and both had agreed there were positive impacts on (A) - Efficient and economic operation of the pipe-line system, (B) - Co-ordinated, efficient and economic operation of the pipeline system and (D) - Securing of effective competition. The Panel agreed with the Proposer and Workgroup.

Governance

TL advised that the Proposer believed IGT176 meets the requirements for an Authority Decision Modification Proposal and noted that UNC 0887 is also an Authority Decision Modification Proposal. They added that the Workgroup agreed with the Proposer and their rationale. The Panel unanimously agreed that the Modification still meets the Authority Decision criteria.

Implementation

TL advised that the Workgroup had recommended for IGT176 to be implemented alongside UNC 0887 and should only be implemented if UNC 0887 is. TL added that this is a standard approach for an enabling Modification. The Panel unanimously agreed with the proposed implementation approach.

Legal Text

The Panel unanimously agreed that no further work was required on the draft legal text and agreed the legal text had been extensively discussed and delivered the intent of the solution.

Recommendations

The Panel **unanimously** agreed:

- that IGT176 does not have an impact on any SCRs or significant industry change projects;
- that IGT176 is an Authority Direction Modification Proposal;
- that impacts and costs set out in the report are accurate and appropriate and there is nothing more to add;
- that IGT176 will have a positive impact on Relevant Objectives (A), (B), and (D);

- with the proposed implementation approach; and
- that the legal drafting delivers the intention of the solution.

The Panel **unanimously** agreed to recommend to the Authority:

- that IGT176 should be implemented.

7. IGT177 - Aligning IGT “must read” obligations within the IGT UNC

TL took the Panel through the Final Modification Report. TL explained that IGT177 aims to retain the “must read” obligations for IGTs in light of the UNC proposal [UNC 0908 - Removal of DNO meter reading obligations resulting from non-provision of a Valid Meter Reading](#), which proposes to remove such obligations for Large Transporters. The Modification ensures that the IGT UNC continues to reflect the current obligations independently, by removing references to UNC Transportation Principle Document (TPD) Section M 5.10 and incorporating the relevant provisions directly into the IGT UNC.

Consultation

TL took the Panel through the consultation responses. They advised that two consultation responses were received. TL added that both agreed that the modification should be Self-Governance. Both supported the implementation of the Modification, agreed that the Modification would have a positive impact on Relevant Objective (F) and were in line with the views of the Proposer and Workgroup. Both consultation responses agreed that the legal text delivered the intent of the solution and with the proposed implementation approach.

TL added that both consultation responses agreed that there would be no direct costs resulting from IGT177, although it was noted by one respondent that should UNC 0908 be implemented, IGTs may incur additional CDSP costs by retaining the ‘must read’ service and therefore becoming sole users of the CDSP service. LG corrected this view by adding that as Shippers would still be using the service, IGT UNC parties would not be the sole users of the service. The Chair reminded the Panel that this would be a direct impact of UNC 0908, not IGT177. JR agreed. The Panel agreed that there may be impacts under the UNC Modification and that these may fall on Shippers as well as IGTs.

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

Governance

TL noted that pre-consultation, the Panel had agreed with the Workgroup that IGT177 should proceed as a Self-Governance Modification. The Panel unanimously agreed that the Modification continue to meet the Self-Governance criteria.

Solution

The Panel agreed unanimously that no further work was required on this Modification.

Impacts

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

TL noted the differences in views on consumer benefits between the Proposer and Workgroup. The Proposer identified positive benefits in lower bills and improved quality of service, whilst the Workgroup identified neutral benefits for all areas. The Panel noted the differing views on consumer benefits resulting from IGT177.

The Panel reviewed the Workgroup discussions on cross-Code impacts and agreed that no cross-Code impacts were identified for this Modification. The Panel also agreed with the Workgroup that no environmental impacts were identified for this Modification.

The Panel agreed with the Proposer and Workgroup that there is a positive impact on Relevant Objective (F).

Implementation

TL advised that the current implementation approach is for IGT177 to be implemented as part of an Extraordinary IGT UNC Release and that this Release should take place as soon as possible following approval and the closure of the 15 Working Day Appeal Window.

TL added that if the Modification was approved by Panel in this meeting, the appeal window would close on 19th September. TL confirmed that they were aiming deliver this release on 26th September, which would be 5 working days following the closure of the appeal window. The Panel unanimously agreed with the proposed timeline and implementation approach.

Legal Text

The Panel unanimously agreed that no further work was required on the draft legal text and agreed the legal text had been extensively discussed.

Recommendations:

The Panel **unanimously** agreed:

- that IGT177 does not have an impact on any SCRs or other significant industry projects;
- that IGT177 is a Self-Governance Modification Proposal;
- that Impacts and costs set out in the report are accurate and appropriate, and they had nothing new to add;
- that IGT177 will have a positive impact on Relevant Objective (F);
- with the proposed implementation approach; and

- that the legal drafting delivers the intent of the solution.

The Panel **unanimously** agreed that:

- that IGT177 should be implemented

8. IGT178 - PC4 Read Submission Window Extension

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

LG asked about the impact on IGTs for the timeline to submit their 'must reads'. JR responded that the Modification is looking to extend the current windows on IGTs for submitting their 'must reads'. The Chair added that the current window for 'must read' submissions introduced into the IGT UNC by [IGT159](#) is 'hard coded' to 25 Days and will be changed to marry up with the UNC read submission window being introduced in UNC 0884.

AB advised that they had suggested that IGT178 be subject to an Authority Decision, in line with UNC 0884.

TL took the Panel through the proposed timeline for the Modification, adding that the Proposer had suggested the Modification is assessed for one Workgroup meeting before returning to Panel in September and then out for consultation. The Panel unanimously agreed with the proposed Modification timeline.

Determinations:

The Panel **unanimously** agreed:

- that the Modification should be subject to an Authority Decision; and
- that the Modification should be referred to the Workgroup for further assessment.

9. IGT179 - NExA Tables Clarification Update and Related Documents

AB provided an introduction of the Modification to the Panel. AB explained that IGT179 aims to clarify the publication of NExA tables and correct errors in variance reporting. The Modification includes updates to ancillary documents, specifically the NExA CSEP Ancillary Agreement and the NExA Procedures Document, to improve clarity and ensure accurate representation of data.

AB 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.

AB recommended that the Modification be treated as a Self-Governance Modification Proposal, that it should be assessed by a single workgroup before returning to Panel in September to be issued out to consultation.

AB advised that they had prepared a presentation on IGT179 but due to time constraints, could not present it in this meeting but would present it at the September Workgroup. LG asked if they could send the presentation to Panel members. The Chair agreed to this and added that the Code Administrator would publish it as part of the meeting papers for the Panel meeting, as well as the Workgroup meeting in September.

Determinations:

The Panel **unanimously** agreed:

- that the Modification should be subject to Self-Governance; and
- that the Modification should be referred to the Workgroup for further assessment.

Authority Updates

10. Authority Update

EO provided the Panel with the following updates:

- On Thursday 13th August, Ofgem hosted a workshop focused on the implementation of their proposed prioritisation policy, which followed the publication of the decision document on 1st August. This was issued alongside the Strategic Direction Statement, which confirmed Ofgem's intention to proceed with further consultation under Schedule 12 of the Energy Act 2023.
- Ofgem have now published their preliminary Strategic Direction Statement (SDS) to help coordinate and prioritise strategic change across industry codes. The SDS contains a strategic assessment of government policies and developments in the energy sector that Ofgem consider will or may require code modifications. This is a precursor to the SDS, it will be published annually following designation of industry codes. Ofgem recognise the value placed on early engagement during development of the SDS and intend to maintain this approach going forward. Ofgem's preliminary SDS consultation decision document has been published alongside the final preliminary SDS. This outlines Ofgem's rationale and development process for the implementation and content of the preliminary SDS. It also details their conclusions, rationale for positions, next steps on the development and introduction of a harmonised prioritisation process.
- Ofgem have published their proposals to grant Code Manager licences to Elexon and the Retail Energy Code Company (RECCo) for the Balancing and Settlement Code (BSC) and the Retail Energy Code (REC) respectively. These documents set out the reasons for

Ofgem's decision and are open to stakeholder representation for a period of 28 days until 29 August. Ofgem are pleased to be making continued progress towards granting the first Code Manager licences for the BSC and REC scheduled for 2026.

- Alongside this, Ofgem are advancing their broader work on the Code Manager selection process for future phases. This includes Ofgem's intention to consult on draft guidance and criteria on the competitive process in due course, alongside plans to begin a selection process for phase two Codes later this year.
- If you have any questions related to Energy Code Governance more generally, please contact Ofgem at industrycodes@ofgem.gov.uk

JR asked whether Codes should start adhering to the approach outlined in the SDS prior to the new Code Managers coming in. EO responded that this could be a useful approach, and added that there will be more adjustments for certain Codes, particularly in those where there is no current prioritisation process.

11. Ofgem's Expected Decision Dates

EO confirmed there were currently no IGT UNC Modifications awaiting an Authority decision on the EDD table.

The Panel noted that UNC 0887 had been approved by Ofgem and set for implementation, with Ofgem choosing not to wait for IGT176 to make a joint Authority Decision.

AOB

12. Code Consolidation

GF and PM provided an update on efforts to coordinate Code Consolidation. They reported ongoing discussions planned with Ofgem and other Code bodies to ensure alignment and a smooth transition. The meeting with Ofgem is planned for October to discuss coordination thoughts. The Panel supported the idea of a gas cross-Code meeting in the autumn to improve communication and collaboration.

The next IGT UNC Panel meeting is scheduled for Friday 26th September 2025.

Annex 1 – Actions Table

Reference	Action	Owner	Status
25/07 - 01	<i>Code Administrator to request feedback from IGT UNC parties on draft response to Ofgem Data Best Practice Consultation.</i>	<i>Code Administrator</i>	<i>Closed</i>