

IGT UNC Review	At what stage is this document in the process?
RG008: IGT UNC Code Review in preparation for Code Manager and Code Consolidation	01 Request 02 Workgroup Report 03 Final Modification Report
Purpose of Review: This Review looks to commence IGT UNC preparatory activity ahead of the Code Manager appointment and the subsequent Code Consolidation work that will be undertaken as part of Code Reform and the introduction of the Unified Gas Network Code (UGNC).	
	The Proposer recommends that this Review should be assessed by a Review Group. This Review will be presented by the Proposer to the Panel on 28th November 2025.
	High Impact: IGT UNC
	Medium Impact: IGTs, Shippers, Suppliers
	Low Impact: CDSP

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About this document:

This document is a Review Proposal request, which will be presented by the Proposer to the Panel on **28th November 2025**.

The Panel will consider the Proposer's recommendation and agree whether this Review should be referred to a Review Group.



Any questions?

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1 Review

Why is the Review Request being made?

The purpose of this Review is to commence IGT UNC preparatory activity ahead of the Code Manager appointment and the subsequent Code Consolidation work that will be undertaken as part of Code Reform and the introduction of the UGNC. Collaborative working by the Review Group will define the most effective approach and it is expected that the approach might include the following:

- A review of the entirety of the IGT UNC in consideration of Code Consolidation. Work is already being undertaken in the UNC, with housekeeping changes being made to essentially 'clean up' the Code ahead of the Code Manager being introduced.

The Review Group would look to assess and consider the following:

- Correcting errors – be this pointing to UNC, grammatical, which would fall into housekeeping changes.
- A view to ensuring that any IGT specific governance within the IGT UNC, when transitioning to the new UGNC, is prepared and able to standalone as schedules in the new Code.
- Ensuring that the governance works where it refers to the UNC. This would look to explore whether the direct referencing of the UNC within the IGT UNC still works and is aligned.¹

The work this Review Group would look to achieve would be at the benefit of the Gas Code Manager and the Authority. The groundwork we would look to deliver would allow the Code Manager an easier start in undertaking the Code Consolidation work that will come after their appointment.

Scope

We would recommend that the scope of this Review is the entirety of the IGT UNC (including Ancillary Documents, guidance and process documents).

Impacts & Costs

The Review is not expected to create system costs. The main impact is administrative, requiring the Code Administrator and Workgroup to review and recommend changes.

It would be worth noting that benefits could include a cleaner, more robust Code, which could help reduce the risk of errors or misinterpretation during and after Code Manager implementation, and Code Consolidation.

Recommendations

It is recommended that this Review is progressed to a Workgroup for review to ensure that any possible preparatory work can be undertaken to the IGT UNC in advance of the Code Manager appointment, and Code Consolidation.

¹ This will likely have to be completed last, given the changing nature of the UNC, and worth keeping in mind.

Additional Information

This Review will support the wider industry programme of Code Governance Reform, helping to reduce complexity and fragmentation by ensuring the IGT UNC is aligned where needed with the UNC.

2 Impact and Costs

Consideration of Wider Industry Impacts

The Review supports gas Code consolidation and wider Ofgem objectives for Code simplification. It will deliver industry benefit by ensuring smooth transition without duplicative or inconsistent provisions.

Impacts

Impact on Central Systems and Process	
Central System/Process	Potential impact
UK Link	No direct system changes anticipated
Operational Processes	No direct operational process changes anticipated

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	Positive impact – correction of errors and providing clarity on governance. Impact would be purely administrative rather than operational.
Development, capital and operating costs	N/A
Contractual risks	N/A
Legislative, regulatory and contractual obligations and relationships	TBC

Impact on Transporters	
Area of IGT business	Potential impact
System operation	N/A
Development, capital and operating costs	N/A
Recovery of costs	N/A
Price regulation	N/A
Contractual risks	N/A
Legislative, regulatory and contractual obligations and relationships	TBC
Standards of service	N/A

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	N/A
IGT UNC Panel	N/A
General administration	Positive – better readiness for consolidated governance

Impact on Code	
Code section	Potential impact
	TBC – corrections, and updates expected across the IGT UNC sections

Impact on IGT UNC Related Documents and Other Referenced Documents	
Related Document(s)	Potential impact
	TBC – corrections, and updates expected across the IGT UNC sections

Other Impacts	
Item impacted	Potential impact
Security of Supply	N/A
Operation of the Total System	N/A
Industry fragmentation	N/A

2 Terms of Reference

Objective of the Review Group

The proposed objective of the Review Group is to commence IGT UNC preparatory activity ahead of the Code Manager and the subsequent Code Consolidations work that will be undertaken including, but not limited to, the following:

- Development of solutions to assist Code Manager in their work to consolidate Codes;
- Consideration of potential changes required at the request of Ofgem for Code Reform;
- Assessment of potential impacts of the Review; and
- Assessment of legal text.

Work Approach

- **Phase 1:** Identify IGT UNC nuances to those of the UNC. For example, Metering, New Connections process, invoicing; and

- **Phase 2:** Correcting errors (i.e. housekeeping changes) and ensuring that the governance works where it refers to the UNC. This would look to explore whether the direct referencing of the UNC within the IGT UNC still works and is aligned.

Scope

- **In Scope:** The scope of the Review will cover, as minimum, the main IGT UNC document, Ancillary, Guidance, Process documents and templates used by IGT UNC parties. It is likely that Modifications could be raised whilst progressing the review, Consideration to be given to potential changes required at the request of Ofgem for Code Reform.
- **Out of Scope:** The Review will not look to change existing and/or future governance, unless deemed relevant as the Review Group progresses.

Outputs

Produce a Review Report for submission to the Modification Panel, containing the assessment and recommendations of the Review Group including a draft Modification(s) where appropriate.

We would suggest that feedback and updates are provided to IGT UNC Panel on a monthly basis, with the ability to raise draft Modifications where needed.

Composition and operation of Review Group

The Workgroup is open to any party that wishes to attend or participate but will be dependent on the direction the Review Group decides to take in terms of operation.

It is proposed that the Review Group should comprise of attendees at the regularly scheduled Modification Workstream meetings, plus others who wish to attend. The Review Group will not require quoracy as it is not a decision-making group. Review Group meetings will still proceed, even if a full Workstream is not in attendance.

Meeting Arrangements

Meetings will be administered by the Code Administrator and conducted in accordance with the Code Administration Code of Practice.

3 Recommendation

The Proposer invites the Panel to determine that:

- Review 008 progress to Workgroup for review.