

IGT UNC Modification Panel Meeting

Draft Minutes

Friday 27th February 2026

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Talan	Code Administrator	Chair
Catherine Fearon	CF	ES Pipelines	Observer	Proposer for IGT181
Cher Harris	CH	Indigo Pipelines	Panel Member: Pipeline Operators	
Ellie Osobina	EO	Ofgem	Authority	
Graeme Forbes	GF	Talan	Code Administrator	
Jenny Rawlinson	JR	BUUK	Panel Member: Pipeline Operators	
Lee Greenwood	LG	Centrica	Panel Member: Pipeline Users	
Richard Welsby	RW	Last Mile Gas	Panel Member: Pipeline Operators	
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 no apologies received prior to the start of the meeting.

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). LG added Item 11- Non-Compliance with IGT173.

3. Approval of the previous minutes (26-01 and 26-01 Reconvened)

The CA invited comments on the January 2026 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 were no outstanding actions.

Modification Business

5. IGT181 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers

CF provided the Panel with an introduction of the Modification. They noted that IGT181 mirrors [UNC 0854](#), which was approved in May 2024, and this Modification seeks to align the IGT UNC with the UNC. CF explained that UNC0854 introduced the concept of a User Premises Termination Notice (UPTN) to address situations where a Supplier is subject to UK Government sanctions, which provides a mechanism to suspend a Supplier's Licence and trigger associated processes. IGT181 seeks to introduce the same concept into the IGT UNC, addressing a current gap in the Code.

Under the proposed changes, the introduction of a UPTN in the IGT UNC would allow for activation of the Supplier undertaking to trigger the Virtual Last Resort User (VLRU) and contingent procurement of supplier demand, where relevant criteria are met.

CF noted that, at present, the IGT UNC does not adequately cover Government sanctions under existing "user default" provisions, meaning IGTs would not be captured if such a scenario arose. IGT181 therefore closes this gap and ensures IGTs are treated consistently with Gas Distribution Networks (GDNs).

CF added that without this Modification, IGTs would need to be handled separately, despite the original intent of UNC0854 being applied across both GDNs and IGTs.

TL advised that the plan is for IGT181 to be taken to three Workgroup meetings. The intention is to review the detail of the Modification at the first meeting, develop draft legal text shortly thereafter, which will be refined at a second meeting, and aim to conclude the Workgroup Report by the third meeting. On this basis, IGT181 could return to Panel for a decision in July 2026.

TL added that IGT181 is intended to enable the IGT UNC to utilise existing mechanisms already introduced under UNC0854, rather than introduce new policy or materially change impacts on parties. It was noted that while the Modification mirrors UNC0854, there may be value in reviewing the Final Modification Report (FMR) from the UNC Modification to identify any issues or discussions that may be particularly relevant for IGTs. TL agreed to review the FMR ahead of the Workgroup and highlight any points for consideration.

In terms of impacts, it was noted that there is no additional central systems impact if the Modification is approved, as changes implemented to deliver UNC0854 were applied to both GDNs and IGTs. However, if the Modification were not approved, there could be a requirement for systems changes to be backed out for IGTs, and this has been acknowledged in the Modification Proposal Form.

Governance

The Chair noted that the Proposer had indicated this Modification should be subject to Self-Governance. JR raised concerns that IGT181 did not meet the criteria for a Self-Governance Modification. They noted that while the Modification mirrors UNC0854, which has been previously approved by Ofgem, Ofgem has also previously made clear that all Modifications must progress on their own merits, regardless of the progression of related Modifications elsewhere. While the history of UNC0854 is relevant context, the Panel must be satisfied that IGT181 independently meets the Self-Governance criteria. JR questioned whether IGT181 had an impact on competition, given the Modification's purpose is to enable intervention in the event of sanctioned Shippers. CH agreed with this view. CH and JR both voted for IGT181 to be subject to an Authority Decision, while LG and RW voted for Self-Governance. This resulted in a split decision.

TL clarified that the governance route for a Modification can be changed at any point and suggested that the IGT Workstream could deliberate this matter as part of the Modification assessment. The Chair agreed and suggested that Ofgem could also provide their views on the matter ahead of the March IGT Workstream meeting. EO responded that they would take this away for internal feedback.

Significant Code Review

The Chair noted that the Proposer had indicated no impact from the Modification on an SCR or other significant industry project. The Panel unanimously agreed with this approach.

Determinations:

The Panel **unanimously** agreed that:

- IGT181 should be progressed to the IGT UNC Workstream for further assessment.

6. Workgroup Summary Report

The Panel reviewed the Workgroup Summary Report.

JR asked whether the CSL01 - Exclusion of Standalone Networks from IGT UNC would return to the IGT Workstream in March and whether Ofgem's input was being sought on whether the Modification should proceed as a licence change, or IGT UNC Modification. The Chair confirmed that the issue had been discussed at the February Workstream meeting, particularly around potential licence implications, but no conclusion had been reached. The Modification will therefore return to the next Workstream meeting for further discussion.

EO explained that discussions had begun internally ahead of the next Workstream meeting, but no firm position had yet been reached on licence changes versus IGT UNC Modification. They clarified

that Ofgem had not given broad support to the proposal itself, only an indication that some elements may require an IGT Modification. A clearer position is expected for the March Workstream meeting. The Chair added that the Modification proposal has raised significant transparency concerns, making it difficult for the Workstream to assess. In particular, the proposal appears to remove requirements on Shippers without clearly relocating those obligations elsewhere in the CSL Network Code, resulting in more questions than anticipated about its practical effect.

TL noted that the proposer has since provided written responses by email to outstanding questions raised in the February Workstream meeting, and that engagement has been constructive. This should enable the Workstream to address several of the outstanding issues at the next meeting.

Authority Updates

7. Authority Update

EO provided the following updates from the Authority:

- On 26th January 2026, Ofgem launched an Expression of Interest (EOI) process seeking Code Manager candidates for the Consolidated Electricity Commercial Code (ECC) and the Consolidated Gas Network Code (GNC). This is as part of Phase Two of Ofgem's Energy Code Reform programme.
- Ofgem intend to use this process to inform their decision on selection routes by asking potential candidates to submit an eligibility assessment form for Ofgem to consider with their choice between competitive versus non-competitive selection based on the number of candidates that are deemed to be eligible. The EOI will close for responses on 20 March 2026.
- More information on the EOI can be found [here](#). If you have any questions about the process or if you are interested in expressing interest, please email Ofgem at industrycodes@ofgem.gov.uk.

8. Ofgem's Expected Decision Dates (EDD)

EO confirmed there is currently one IGT UNC Modification awaiting an Authority decision on the EDD table. EO advised that:

- There is an expected decision date of 16th March 2026 for [IGT165 - Independent Shrinkage Expert and Independent Shrinkage Charge](#).

AOB

9. Code Consolidation Update and Gas Network Code Collaborative Model Webinar

GF provided an update on work relating to Code Consolidation. They explained that, over the past year, there has been increased collaboration between Xoserve, the Joint Office, and Talan to support consolidation planning and transition arrangements. While Talan does not intend to bid to become the licenced Code Manager, as it does not meet the criteria, it has an obligation as the IGT UNC Code

Administrator to protect the interests of the IGT UNC during transition and would support the appointed Code Manager of the new Gas Network Code (GNC).

GF advised that Xoserve, the Joint Office and Talan are working together on a joint proposal to apply for the licenced GNC Code Manager role, aiming to provide continuity, retain expertise, and enable a smoother transition. A webinar is being hosted jointly by the three organisations and is scheduled for 6th March to outline proposals and allow initial engagement, and an EOI, led by Xoserve, is expected to be submitted next month.

GF emphasised the importance of:

- maintaining business-as-usual delivery alongside transition activity and establishing separate workstreams for these areas;
- recognising and addressing funding requirements for transition, an issue already raised with Ofgem; and
- improving communications, particularly with Shippers, who need greater visibility of plans and impacts.

They noted that the upcoming webinar is intended to be the start of engagement, with further communications and potentially a follow-up paper to capture questions and current gaps. A single, unified transitional workgroup was suggested as the most efficient approach, rather than multiple parallel groups.

Panel members were encouraged to attend the webinar, and it was agreed that the invite should be circulated more widely due to gaps in existing distribution lists. GF also offered to hold follow-up sessions with Panel members after the webinar to address questions or concerns.

Post-Meeting Note: The Code Administrator issued industry communications providing details of the webinar and directing parties to the [dedicated Joint Office webpage](#) where further details, including dial in details for the webinar, could be found.

10. February 2026 IGT UNC Release

TL confirmed that the February 2026 IGT UNC Code Release was live as of 05:00 27th February 2026. TL noted that release communications have been issued and noted that the following changes were included within the Release:

- [IGT178 - PC4 Read Submission Window Extension](#)
- [IGT179 - NExA Tables Clarification Update and Related Documents](#). As part of the implementation of IGT179, [changes to the CSEP NExA tables and related ancillary documents](#) were also included in the Release
- [NExA AQ Value Table for 2026/27](#).

JR welcomed the updates to the NExA Table Process, adding that it will bring added clarification to IGTs. TL agreed and added that the timing of implementation is beneficial given that stakeholder queries always increase in the build up to the annual review cycle beginning in spring/summer. TL added that they would speak to the Independent Networks Association (INA) about providing clear industry communications on the changes to the NExA process. JR asked if the Code Administrator would send out comms to all parties. TL responded that this could be an option but reminded Members that the NExA process is run by the INA.

11. Non-Compliance with IGT173

The Panel discussed ongoing concerns regarding compliance with [IGT173](#), which requires the sending of Relative Price Control (RPC) data files from IGTs to Shippers via the Information Exchange (IX). The Modification was implemented in November 2024, and issues of non-compliance have previously been raised at both Workgroup and Panel.

It was noted that some parties continue to not fully comply with the requirements of the Modification. LG advised that Centrica had raised a complaint of non-compliance by some IGTs, which had been discussed at the February Workstream meeting. The issues raised included partial implementation, continued use of email rather than the IX, and a lack of engagement or response from certain parties when contacted directly. LG reported that this results in inefficiencies and additional manual intervention, undermining the intended uniformity and efficiency benefits of the Modification. CH added that some Shippers have requested IGTs to continue sending RPC files via email, noting that some Shippers are also not complying with IGT173.

The Panel acknowledged that this constitutes a code compliance issue but noted that such matters fall outside the scope of the Performance Assurance Committee (PAC) and that the IGT UNC has limited mechanisms for enforcing compliance. The Panel discussed the difficulty of addressing non-compliance under the current Code framework and recognised this as a broader governance gap relevant to future Code reform.

The Panel agreed that further evidence was required to understand the scale and impact of the issue. It was agreed that the Code Administrator will issue a Request for Information (RFI) to both IGTs and Shippers to:

- confirm whether IGT UNC parties had fully implemented the solution as per IGT173;
- identify any partial implementation or non-implementation;
- capture experiences of non-compliance by other parties; and
- assess the impacts of non-compliance, including operational or manual effort.

The Panel agreed that non-compliant party names provided in the RFI will be used by the Code Administrator to assess the breadth of the issue but will not be shared publicly, including with Panel members. Responses will be collated by the Code Administrator and anonymised for Panel consideration.

The Panel noted that, depending on the outcome of the RFI, potential next steps may include escalation to Ofgem, including the possibility of providing Ofgem with the names of non-compliant parties if issues persist. The Panel also noted that evidence of impacts would be important should escalation be required.

It was agreed that the findings from the RFI will be brought back to the April Panel meeting for further consideration.

The Panel unanimously supported the proposed approach.

26/02 – 01: Code Administrator to issue a Request for Information to IGT UNC parties on ongoing examples of non-compliance with IGT173 – Gateway Delivery for RPC Data, with responses to be reviewed at the April Panel meeting.

The next IGT UNC Panel meeting is scheduled for Friday 27th March 2026.

Annex 1 – Actions Table

Reference	Action	Owner	Status
26/02 – 01	Code Administrator to issue a Request for Information to IGT UNC parties on ongoing examples of non-compliance with IGT173 – Gateway Delivery for RPC Data, with responses to be reviewed at the April Panel meeting	Code Administrator	Open

DRAFT