

IGT UNC 26-03 Modification Workstream Meeting

Draft Minutes

Thursday 12th March 2026 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Talan	Chair
Aleksis Butler	AB	BUUK	Proposer for RG008
Ben Mitchell	BM	Xoserve	
Catherine Fearon	CF	ES Pipelines	Proposer for IGT181 Item 6 only
Cher Harris	CH	Indigo Pipelines	Items 1-7
Ellie Rogers	ERo	Xoserve	Item 7 only
Ellie Rutherford	ERu	Energy Assets	Items 1-7
Harry Davis	HD	CSL (CNG Services Ltd)	
Helen Gilbert	HG	National Energy System Operator	
Joseph Glews	JG	Ofgem	Items 1-7
Kathryn Adeseye	KA	Xoserve	Item 6 onwards
Matthew Smith	MS	Xoserve	Item 7 only
Stuart Monk	SM	Xoserve	Item 5 only
Tim Davis	TD	CSL (CNG Services Ltd)	Proposer for CSL01 Item 7 onwards
Talia Lattimore	TL	Talan	Code Administrator
Harry Firth	HF	Talan	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting. Apologies had been received from Ellie Osobina (Ofgem).

The Chair acknowledged that there were no Shipper representatives present at the meeting. The Chair explained that there were no quoracy rules which would prevent the meeting from proceeding without a Shipper present. However, the Chair offered the opportunity for attendees to raise a challenge if they considered this to cause significant issue. Attendees unanimously agreed that the meeting could proceed in the absence of a Shipper representative, providing that the circumstances were noted in the meeting minutes.

2. Confirmation of Agenda

The Chair confirmed the items for discussion outlined in the Final Agenda and asked for any additional items of business to be raised. TL added items 8 - Gas Network Code Collaboration Model Webinar and 9 - Sponsors Required for IGT UNC Modifications.

3. Approval of the Previous Minutes 26-02

HF noted that no comments on the minutes of the previous meeting had been raised in advance. AB praised the summary of RG008 discussions in the minutes. The Workgroup had no further comments to add to the minutes, which were consequently approved as a true and accurate record of the meeting.

4. Outstanding Actions

The Chair noted that there were four outstanding actions for consideration:

26/02 – 01: Harry Davis (CSL) to provide further clarity with respect to the following questions raised regarding the detail of the solution for CSL01, ahead of the next meeting of the Modification Workstream scheduled for 12th March 2026. TL noted that CSL had provided responses to the questions ahead of the meeting, which have been set out below:

- **If no commercial Shippers will be involved on the standalone network, why does the INC require changes as it is a contract between the IGT and a Shipper?**

Apologies if this was not clear at the meeting, but it is incorrect that there will be no Shipper. Slide 8 of the [pack](#) we provided ahead of the meeting confirmed this: "Shippers/Suppliers required as per Gas Act ".
- **Why was a sandbox solution not considered?**

Neither ourselves nor Ofgem suggested a sandbox solution might be appropriate. What we are proposing builds on existing provisions and does not require regulatory change.
- **How would switching and competition work on the standalone network?**

The proposal is silent on how switching and competition would work. We would expect the arrangements in any particular case to reflect the circumstances and be dictated by the parties concerned. From our perspective as the IGT, if a consumer wishes to change Shipper/Supplier, they are free to do so at any time. This would be a commercial decision based on negotiation and agreement, with no need to codify the process. This is how the change of Shipper occurs for biomethane entry - unlike exit, the UNC is silent on the change of Shipper process.

The Workstream noted CSL's responses to the outstanding questions. KA asked if the Proposal was aimed at just commercial consumers. TD responded that there would be no domestic consumers on the standalone network, as it would be impractical. The Proposal for CSL01 does not mention domestic consumers so as not to exclude them, but in practice, all the consumers connected will be commercial consumers.

The Workstream agreed to close the action.

26/02 – 02: Code Administrator to engage with Ofgem with respect to its position regarding CSL01, ahead of the next meeting of the Modification Workstream scheduled for 12th March 2026. TL noted that the Code Administrator had reached out to Ofgem following the February

Workstream meeting. While Ofgem had provided a direct response to the points raised, JG attended the meeting and provided Ofgem's view on the Modification. The detail of this is covered under Item 7.

The Workstream agreed to close the action.

26/02 – 03: Ahead of the next Modification Workstream meeting on 12th March 2026, RG008 Members to consider Part CI in support of the Phase One identification and logging IGT-specific provisions. Part CI – Supply Points was reviewed by Workstream members in this meeting as part of ongoing work on RG008. Further detail on this is covered under Item 5.

The Workstream agreed to close the action.

26/02 – 04: The Code Administrator to raise Missing/Invalid RPC Files onto the agenda for the next Modification Panel meeting scheduled for 27th February 2026. TL advised that the issue of missing/invalid Relative Price Control (RPC) Files raised at the February Workstream meeting was discussed at the February IGT UNC Panel meeting. TL advised that Lee Greenwood (Centrica), who had first raised the issue of non-compliance with [IGT173 – Gateway Delivery for RPC Files](#), had informed the other Panel members of some of the issues these examples of non-compliance had caused their organisation.

TL advised that the Panel had decided to proceed with a Request for Information (RFI) to all IGT UNC parties to obtain more details on examples of non-compliance. TL added that the Code Administrator would be issuing the RFI in due course and encouraged the Workstream to submit responses. The Chair advised the Workstream that responses would be anonymised for Panel review, although the Panel reserve the right to pass on the full responses to Ofgem.

The Workstream agreed to close the action.

MODIFICATIONS

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

As the Proposer for the Review Group, AB reminded the Workstream of the intent of the Review, explaining that RG008 proposes a proactive, collaborative tidy-up of the IGT UNC, so documentation handed to a future Code Manager of the Gas Network Code (GNC) is “consolidation-ready”.

AB presented some [slides](#) on the intent of the Review. They defined an IGT UNC “nuance” as any provision or definition that is unique to the IGT UNC Code or materially different from the UNC, and advised the Workstream that identifying these nuances will form the first section of RG008.

AB also mentioned Individual Network Codes (INCs), noting a question in the previous meeting asking whether these were within the scope of RG008. AB confirmed that BUUK had not intended to include INCs within RG008 but encouraged IGTs to review their INCs ahead of Code Consolidation, suggesting that Ofgem could consider removing the Licence obligation for Transporters to have an INC.

The Workstream completed a collaborative review of IGT UNC Part CI (Supply Points), with Members having an action to review this Part ahead of the meeting to identify IGT and IGT UNC-specific provisions. BM advised that they had identified some required housekeeping changes in Part CI. AB suggested that these could be sent to the Code Administrator to be included with the RG008 tracker and suggested that housekeeping changes would be discussed in further detail as part of the second phase of RG008.

The Chair asked how RG008 will pick up changes to the UNC which could affect cross-Code references in the IGT UNC. TL advised that they currently investigate the cross-Code impacts of every UNC Modification as part of the work required for the Cross Code Modification Implications tracker and for general engagement with the UNC. TL suggested that the Review Group could be used to raise and progress any Modifications to implemented required changes to the IGT UNC, and they could engage with the UNC through existing channels to keep the Review Group informed of cross-Code impacting changes.

AB added that they do not want RG008 to go on longer than necessary and suggested that an ad hoc meeting could be organised to discuss any additional cross-Code changes at a later date. TL advised that there is no set time period for a Review Group to last, and RG008 could stay open until Code Consolidation is completed.

The Workstream identified the following IGT UNC nuances within Part CI:

- CH noted that 1.2 states that only one Pipeline User may be registered at a Supply Point, and the IGT UNC does not allow for shared Supply Points, unlike the UNC.
- AB noted that 1.5 (d) states that all Supply Meter Points are Central Switching Service (CSS) Supply Meter Points. They added that while this is currently a nuance, [IGT176 - Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#) which is pending implementation, will introduce non-CSS Supply Meter Points into the IGT UNC and therefore this will no longer be a nuance. AB also noted similar impacts on Paragraphs 4 and 8. TL responded that this reference, along with many others, will need to be re-examined ahead of IGT176 implementation.
- CH noted the Service Level Agreement (SLA) in 2.8, that Pipeline Operators will use reasonable endeavours to visit a Supply Point premises within 15 Supply Point Systems Business Days. They asked whether the timeframe was the same under the UNC. TL responded that the UNC will need to be checked to see if this matches. AB and SM also noted the slight difference in the definition of Business Days in the UNC and IGT UNC, which is covered in Paragraph 5 of Part CI. TL added that the only difference is 5.3(b) which defines a Business Day as any day, other than the day which would be the first Business Day after 1st January. The Chair advised that this is because it is a Scottish Bank Holiday.
- SM noted that in 3.1, it states that paragraph 2.1.4 of UNC Section G shall not apply. This paragraph states that if the Transporter determines and notifies the Registered User, that it would not be practicable or economic for the Class 1 Meter Read Requirements to be

satisfied, in respect of a particular supply point, the Class 1 Requirement shall not apply. SM asked why the IGT UNC has not included this clause. The Chair responded that this could have been as a result of re-numbering in Section G, causing this reference to be outdated. They asked SM to send over the entirety of Paragraph 2.1. BM added that there is some overlap in this section with the legal text for IGT176, which should also be checked to see if that reference has been provisionally removed.

- AB noted that 3.2 (c) defines Class 1 Read Provider, which is not defined in the UNC.
- AB noted the Local Distribution Zone (LDZ) LDZ Connected System Exit Point (CSEP) Ancillary Agreement in 3.3, adding that it is referenced in the UNC, but asked if this would be an IGT UNC nuance. The Chair and SM responded that it should be included as a nuance, adding that the Agreement was put into the UNC to help support arrangements between an IGT and an End User, and is not used by the Gas Distribution Networks (GDNs), although this may change after Code Consolidation.
- SM noted that 6.2 and 6.4, on Annual Quantity (AQ), which includes the RPC Entry AQ, are not included within the UNC. The Chair asked how the starting AQ of a new premise is determined in the UNC. SM responded that they are not completely sure. The Chair suggested that this could lead to two active methods in use under the GNC. CH advised that GDNs using Network Exit Agreement (NExA) tables have been floated previously and could be considered again under Code Consolidation.
- AB noted that for 8.2, the provisions of Section G5.1 of the UNC shall apply. They noted that Section G5 is focused on CSS Supply Points and Supply Point Registration and asked why the IGT UNC only refers to G5.1 here. TL suggested that the IGT UNC may cross-reference other areas of Section G5 elsewhere. SM added that they also believed that the whole of Section G5 should apply here and suggested that it would be useful to check any other instances where the IGT UNC references Section G5.
- CH noted 9.1 (a) and 10.1 (a) which specifically reference the developer, they suggested that these are likely unique to the IGT UNC and should be checked. CH also noted 9.2 and 10.2 which reference the New Connections Ancillary Document and Project Summary Report. SM added that 9 and 10 do not exist in the UNC, but suggested that these may have been specifically adapted from Section G5 for the IGT UNC, hence why only Section G5.1 is applied for 8.2.
- TL noted the definition of New Supply Meter Point in 9.4 and the need to check the term with what may be in the UNC. SM confirmed that it is defined in the UNC. AB also called out Project Summary Notification in the same clause.
- SM noted in 11.1 (a) that Terminated Supply Meter Points is defined in the IGT UNC, but not the UNC.
- SM noted in 22.2 the IGT UNC references Paragraph 10.2.3(a) in the UNC but added that this does not exist. They added that they believe the correct reference is Paragraph 10.3.2(a).

The Workstream agreed to review Parts CII and CIII of the IGT UNC in the April Workstream meeting as part of the next step in the work for RG008.

Action 26/03 – 01: Ahead of the next Modification Workstream meeting on 9th April 2026, RG008 Members to consider Parts CII and CIII in support of the Phase One identification and logging IGT-specific provisions.

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

On behalf of the Proposer for IGT181, KA provided an overview of the Modification Proposal. They noted that IGT181 mirrors [UNC0854](#), which was approved in May 2024, and this Modification seeks to align the IGT UNC with the UNC. KA 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. The Workgroup was advised that the current IGT UNC user default provisions do not explicitly capture sanctions-based scenarios and therefore do not provide sufficient protections or mechanisms to manage such events. It was noted that legal advice and Government sanctions cannot be relied upon as a trigger under the existing IGT UNC framework. As a result, a specific Code change is required to enable appropriate suspension and contingency arrangements to be applied in a manner that is legally robust and operationally effective. CF noted the ongoing events in the Middle East show the importance of ensuring a robust framework is place for sanctioned Users.

Governance

KA noted that the Panel had a split view when voting on the Governance route for IGT181. They advised that the Proposer had opted for Self-Governance initially, due to the Modification looking to align the IGT UNC with UNC following the implementation of UNC0854, which has also been approved by Ofgem. TL explained that two Panel members had agreed with this rationale and voted for Self-Governance. They added that the other two Panel members had voted for IGT181 to be subject to an Authority Decision, as they felt enabling intervention in the event of a sanctioned Shipper would have an effect on competition, as well as ensuring that IGT181 is assessed as an individual Modification. TL advised that Panel would make the final decision on the Governance route, but were keen for the Workgroup to discuss this matter in further detail. KA added that they and CF would be happy to change their view if the Workgroup decided that IGT181 should be subject to an Authority Decision,

AB supported an Authority Decision, referencing the current affairs that have made this Modification more urgent, and so it would be sensible for Ofgem to make a decision on IGT181. CH and KA agreed with the rationale, adding that the global situation has changed since the Modification was drafted. The Workgroup's initial view was taken that IGT181 should be subject to an Authority

Decision, though it was noted that a final view will be taken before the Workgroup Report is submitted to Panel.

TL took the Workgroup through the proposed timeline for IGT181. They advised that the plan is for the Workgroup Report to be completed and reviewed by the IGT UNC Panel in May 2026.

KA took the Workgroup through the proposed Business Rules (BRs) for IGT181. The Chair suggested that Workgroup attendees should review the BRs ahead of the April Workgroup meeting.

CH asked that when a user's sanction concludes, will the Supply Points that were removed from the User as part of the sanction be transferred back or remain with the new User. KA responded that National Gas Transmission (NGT), the Proposer for UNC0854, had chosen not to include such a provision within the Modification. This was because NGT felt in any eventuality, a determination would swiftly follow the suspension. Following discussions in the UNC Transmission Working Group, a decision was taken that in the event of a suspension being lifted prior to termination, an urgent Modification would be raised to establish a process. KA added that NGT had provided their view that in the event that a suspension was lifted on a User, that User would be able to re-enter the market under the same legal entity, but their previous Supply Points would not be returned. The Chair added that in the event that the Shipper has been sanctioned, but the Supplier has not, the Supplier would have almost certainly transferred the Supply Points to a new Shipper. They asked about a scenario where the Supplier and Shipper are the same entity. KA responded that this had been discussed under UNC 0854 but would pull together some information for the April Workgroup meeting.

AB asked about the legal drafting. TL responded that they would be looking to directly reference the UNC, where possible to future-proof the IGT UNC ahead of Code Consolidation. They added that for new defined terms in the IGT UNC, these will have to be pulled out of the UNC.

7. [CSL01 – Exclusion of Standalone Networks from IGT UNC](#)

TL took the Workgroup through the Workgroup Report for CSL01. TL noted that CSL01 had been raised to make an amendment to the CNG Services Ltd. (CSL) Individual Network Code (INC) to exclude the provisions of the IGT UNC from applying to standalone networks (defined as pipelines with no connection to the main gas grid). TL noted the outstanding actions relating to CSL01 from the February Workstream meeting. HD took the Workgroup through CSL's answers to the outstanding questions in **26/02 – 01**.

There was a discussion on the Xoserve's presentation on potential scenarios and Central System impacts at the February Workstream meeting. KA apologised to TD that the presentation was submitted as a late paper, and engagement was not possible prior to the meeting. They noted that discussions have taken place offline since the February Workstream between CSL and Xoserve, which have been useful in understanding the scope of the Proposal. TD added that CSL have engaged with Xoserve on this Proposal for over a year. The Chair asked for clarity on the discussions that have taken place between CSL and Xoserve, noting that this information will need to be captured in the Workgroup Report. KA confirmed that following further review, Xoserve can confirm that CSL01

has no impact to Central Systems. ER apologised to any Workgroup members who felt misled by the presentation at the last meeting, noting that the scenarios discussed had been raised at an early stage of Xoserve's impact assessment of CSL01. Following further review and discussions with CSL, ER added that Xoserve were happy to confirm CSL01 has no Central System impacts. They apologised to TD again for not engaging with CSL on the presentation prior to the February Workstream meeting. ER added that they felt the presentation had led to valuable discussions in the last meeting. TD advised that they were keen to go through the scenarios in this meeting to discuss why they are incorrect. HG agreed that this would be the best approach to resolve this issue.

The Workgroup went through the four scenarios raised by Xoserve in the February Workstream meeting. TD advised that the first scenario, "No entry to the Total System", is the only applicable scenario, and does not have a Central System impact. The third scenario, "Entry only to Total System and offtake of biomethane by the End Consumer", is theoretical and would be impractical in practice. The Workgroup agreed that the second and fourth scenarios are not relevant to this Modification and are already being done under Code.

The Chair noted the second outstanding action related to CSL01, **26/02 – 02**, with the Code Administrator to engage with Ofgem on their position on CSL01. JG advised that they had prepared a response. They noted that discussions had been held on whether CSL01 is better to be progressed as a change to licence rather than an IGT UNC Modification. They added that usually the best solution is a change to license, rather than a derogation when looking to establish long-standing frameworks or obligations. However, JG noted that changes to license are complex and time-consuming. They added that in this particular case, Ofgem are happy for CSL01 to continue to be progressed as an IGT INC Modification. Although it is not ideal to have a licence that mandates compliance with a network code while the code itself creates an exception, JG noted that there is a legal logic to this approach. They added that this approach has also allowed for significant industry engagement through the IGT UNC Workstream. JG suggested that the Licence could potentially be reviewed and adjusted later to remove unnecessary or complicating requirements. They advised that they would not comment further on the Modification, conscious that Ofgem will make an Authority Decision on CSL01 at a later date.

TL took the Workgroup through the pre-drafted Workgroup Report. TD mentioned a comment made in the February Workstream discussing a potentially required License change and asked for that comment to be clarified to note that a change to license is not required. TL responded that all discussions that took place on CSL01 need to be included, but they would clarify that the outcome was determined that a License change is not required for CSL01.

Impacts

TL advised that the Proposer had indicated no impacts to a Significant Code Review or other industry change projects. The Workgroup unanimously agreed with this view.

TL advised that the Proposer had identified positive consumer impacts, including reduced environmental harm and broader benefits for society.

. They noted that the Proposer had identified both positive and neutral impacts on lower bills for consumers and asked TD for rationale. TD responded that there would be no benefits of lower bills for existing consumers, but new consumers may get a bill reduction.

CH asked that given CSL01 seeks to disallow the application of the IGT UNC on standalone networks, how could it be impacting consumers under Code. AB agreed and asked how this would apply to the Relevant Objectives. TD responded that the Relevant Objectives still apply as CSL01 is still assessed against them. They added that there will be no impact to existing consumers under Code, which is the purpose of the Modification.

HG queried the benefits for the end consumer on the standalone network, suggesting that as this is setting a new precedent, the impacts will initially be largely unknown. TD responded that the end consumer has invested significant funds into the Anaerobic Digestion (AD) plant and standalone network, which would not happen if they did not believe they would be positively impacted by this network.

The Workgroup agreed with the Proposer's view on consumer benefits for CSL01.

TL noted that the Proposer had not identified any cross-Code impacts. The Workgroup unanimously agreed with the Proposer's view.

TL noted that the Proposer had identified positive environmental impacts. The standalone network will support increased biomethane production, supporting net zero by displacing fossil fuel usage. The Chair noted previous discussions regarding flaring and whether there was a possibility for that to take place. TD responded that there is always a risk of flaring, and the chances of flaring associated with a standalone biomethane network connected to an AD plant is much the same as any other network. The reasons for flaring would also be the same.

The Workgroup agreed with the Proposer's view on environmental impacts for CSL01.

TL noted that for the Relevant Objectives, the Proposer had identified positive impacts on Objectives (D) – Securing of effective competition and (F) – Promotion of efficiency in the implementation and administration of the Code. CH agreed with the Proposer's view, noting that disapplying the IGT UNC to standalone networks will minimise the impacts on existing Code parties and Code arrangements. The Workgroup unanimously agreed with the Proposer's view on the Relevant Objectives.

Implementation

TL advised that with no systems or process changes required, the implementation can be immediate once the proposal is accepted or be completed as part of a schedule release. TD asked what implementation activities would be required for this Modification. TL responded that although there will be no change to the IGT UNC Code itself, any changes to an INC will have to be published by the

Code Administrator and notice of the formal implementation date given in the same way it would be for an IGT UNC Modification.

TL suggested an implementation approach of one working day after the 15-day working day appeal has ended following Ofgem's published decision, noting that they would need a word version of the updated CSL Code to be provided ahead of the implementation date. The Workgroup unanimously agreed with this approach.

Governance

TL advised that the Proposer has suggested that CSL01 be subject to an Authority Decision. The Workgroup unanimously agreed with the Proposer's view.

The Chair asked the Workgroup if they were happy to submit the Workgroup Report to Panel for review. The Workgroup agreed that the Workgroup Report had been completed.

STANDING ITEMS

The Chair suggested that due to the low remaining Workstream attendance and time constraints, that updates to the standing items should be postponed until the April Workstream meeting. The Workstream agreed.

Interested parties can view the latest version of the standing items on the [Workstream meeting page](#).

AOB

8. Gas Network Code Collaboration Model Webinar

TL reminded the Workstream about the Gas Network Code Collaboration Model Webinar jointly hosted by Xoserve, Encodar and Talan on 6th March. They advised that the Joint Office would be publishing materials from the Webinar in due course, including the Webinar recording, slide deck, and Q&A.

POST-MEETING NOTE: *The Joint Office have published the post-meeting materials from the Webinar [here](#).*

9. Sponsors Required for IGT UNC Modifications.

TL advised that the Code Administrator are looking for IGT UNC parties to sponsor a required IGT UNC Modification due to cross-Code impacts associated with the following UNC Modifications:

- [0914 - Refining the Class 3 EUC1 read submission rules introduced through Modification 0700](#)
- [0921 - Broadening the definition of the Data Permissions Matrix to align with disclosure of UK Link Gemini data](#)

TL advised that any interested parties should contact the Code Administrator via email at IGTUNC@talan.com.

The next Workgroup meeting is scheduled for Thursday 9th April 2026.

Annex 1 – Actions Table

Reference	Action	Owner	Status
26/02 – 01	<i>Harry Davis (CSL) to provide further clarity with respect to the following questions raised regarding the detail of the solution for CSL01, ahead of the next meeting of the Modification Workstream scheduled for 12th March 2026:</i> <i>If no commercial Shippers will be involved on the standalone network, why does the INC require changes as it is a contract between the IGT and a Shipper?</i> <i>Why was a sandbox solution not considered?</i> <i>How would switching and competition work on the standalone network?</i>	CNG Services	Closed
26/02 – 02	<i>Code Administrator to engage with Ofgem with respect to its position regarding CSL01, ahead of the next meeting of the Modification Workstream scheduled for 12th March 2026.</i>	Code Administrator	Closed
26/02 – 03	<i>Ahead of the next Modification Workstream meeting on 12th March 2026, RG008 Members to consider Part CI in support of the Phase One identification and logging of differences between IGT UNC and UNC.</i>	All	Closed
26/02 – 04	<i>The Code Administrator to raise Missing/Invalid RPC Files onto the agenda for the next Modification Panel meeting scheduled for 27th February 2026.</i>	Code Administrator	Closed
26/03 - 01	Ahead of the next Modification Workstream meeting on 9 th April 2026, RG008 Members to consider Parts CII and CIII in support of the Phase One identification and logging IGT-specific provisions.	All	Open