

IGT UNC 26-05 Modification Workstream Meeting

Draft Minutes

Thursday 14th May 2026 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Talan	Chair
Aleksis Butler	AB	BUUK	Proposer for RG008
Alice Pigott	AP	Ofgem	
Ben Mitchell	BM	Xoserve	
Ben Mulcahy	BMU	Joint Office	
Catherine Fearon	CF	ES Pipelines	Proposer for IGT181
Ellie Rutherford	ER	Energy Assets	
Harry Davis	HD	CSL (CNG Services Ltd)	
Helen Gilbert	HG	NESO	
Lydia Bentley	LB	Talan	Code Administrator
Kathryn Adeseye	KA	Xoserve	
Oorlagh Chapman	OC	Centrica	
Richard Welsby	RW	Last Mile Gas	
Stuart Monk	SM	Xoserve	
Tim Davis	TD	CSL (CNG Services Ltd)	
Talia Lattimore	TL	Talan	Code Administrator
Harry Firth	HF	Talan	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting. There were no apologies received prior to the meeting.

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. No further items were raised.

3. Approval of the Previous Minutes 26-04

HF noted that comments on the minutes of the previous meeting had been raised by AB and BM on the discussions for RG008. 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 was one outstanding action for consideration:

26/04 – 01: Ahead of the next Modification Workstream meeting on 14th May 2026, RG008 Members to consider Part CIV and Part CV of the IGT UNC in support of the Phase One identification and logging IGT-specific provisions. Part CIV and CV were reviewed by Workstream members in this meeting as part of ongoing work on RG008. Further detail on this is covered under Item 6.

The Workstream agreed to close the action.

MODIFICATIONS

5. [IGT181 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#)

TL reminded the Workgroup that IGT181 mirrors [UNC0854](#), which was approved in May 2024, and this Modification seeks to align the IGT UNC with the UNC. TL 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.

KA took the Workgroup through the updated Business Rules (BRs) in the Modification's solution. They noted that UNC0854 had included National Transmission System (NTS) Direct Connect Supply Points within the solution. KA advised that these specific clauses had been removed from the IGT181 when it was raised as they knew this concept did not exist in the IGT UNC. However, these business rules have now been reinstated following discussions at a previous Workstream meeting surrounding [IGT176 - Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#). It was noted in that meeting that IGT176 and UNC0887 will introduce NTS Direct Connect Supply Points into the IGT UNC and UNC when implemented. KA advised that a third clause had been added to BR6 to include a reference to the relevant sections in UNC Transportation Principal Document (TPD) Section G. KA added that IGT181 will now have a two-stage implementation approach.

- **Stage One** will include all of the core IGT181 BRs and will go live shortly after the final decision is received (including the appeals window). Stage One excludes all NTS Direct Connect BRs.

- **Stage Two** will include additional BRs related to NTS Direct Connect Supply Points and will go live alongside/as soon as possible after IGT176.

TL added that if timings align, both stages could be implemented together. Otherwise, Stage One will be implemented first and Stage Two will be paused until we know the implementation date of IGT176. Communications to industry will reflect whichever scenario applies at the point of final decision, with updates provided as more detail on the IGT176 implementation timeline becomes available. The Chair confirmed that IGT176 has already been approved, with only the implementation date still to be determined. TL added that Xoserve had indicated a potential implementation timescale of August 2026. However, the exact date will be determined via the DSC Change process.

TL took the Workgroup through the proposed legal drafting for IGT181. They added that the legal drafting has been clearly split to reflect the staged implementation approach. Proposed changes in stage one are shown in red, with no proposed changes since the last Workstream meeting. Proposed changes in stage two are shown in blue, to reflect the inclusion of NTS provisions once IGT176 is implemented. These changes introduce a reference to the relevant NTS clause (UNC TPDG 4.8.12V) and adjust wording and punctuation to ensure this provision is included rather than inadvertently excluded.

CF asked if any further legal text changes will be required for when stage two is implemented alongside IGT176. TL clarified that no further legal text changes will be required after IGT176 goes live in relation to IGT181, as the stage two drafting already accounts for this. Stage one excludes NTS provisions because they are not yet active, while stage two ensures they automatically apply once IGT176 is implemented.

TL took the Workgroup through the draft Workgroup Report for IGT181. HG queried why the approach uses a two-stage implementation within a single Modification, rather than raising an alternative or a second Modification to complete the stage 2 changes. They expressed concern that this could leave IGT181 open for an extended period. The Chair explained that combining both elements into one Modification is more efficient, avoiding duplication of effort and multiple approval decisions, particularly if Ofgem involvement is required. They noted that IGT176 has already been approved, providing certainty it will be implemented, with only the timing outstanding. The staged approach ensures the legal drafting remains accurate and allows both elements to align when implemented. KA added that the staged approach also avoids delaying implementation of the current change while waiting for IGT176, which is important given current uncertainty. Implementing stage one earlier provides protection to IGTs in the interim.

Governance

The Chair 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.

Workgroup members discussed precedent, with the Chair noting that historically the governance route has typically aligned across UNC and IGT UNC, but that a split Panel decision is unusual. HG indicated a preference towards an Authority decision, on the basis that the two Codes should be treated separately and to ensure robust governance. AB also leaned towards an Authority decision, noting potential risks and the changing political context, while acknowledging the efficiency benefits of Self-Governance. KA noted that circumstances have evolved since IGT181 was originally raised as a Self-Governance Modification, including increased urgency and risk considerations, which may now support an Authority route. They confirmed the Proposer and Xoserve would accept either governance route based on the Workgroup's view. OC highlighted the importance of assessing the Modification based on the current position rather than its original context and suggested including the UNC 854 decision in consultation materials to support stakeholders' understanding.

The Chair suggested that despite several views being put forward by Workgroup members, that a consensus on the governance route had not been reached. They thanked the Workgroup for their views and noted that these would be reviewed by the Panel before they make the final decision on the governance route for IGT181.

TL noted that IGT181 had originally been submitted as a Self-Governance Modification and given that neither the Panel nor Workgroup had reached a majority view on the governance route, suggested it should remain as a Self-Governance Modification for now and that this be noted in the Workgroup Report. CF added that it may be sensible to progress it as is for now, to ensure no further delays for implementation. The Chair noted that Ofgem could decide to call the Modification in for Authority decision themselves if required. AP added that they were unable to provide a view at this meeting, but they would feed back to colleagues, and Ofgem should be in a position to provide a more substantial view at the next Panel meeting.

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 on lower bills and benefits on society as a whole. KA confirmed that this Modification will mitigate risk to the Total System in the event of a sanctioned user, reducing volatility and hopefully keeping costs lower. It is also expected to enable National Gas Transmission (NGT) to secure additional supplies at lower cost. The Workgroup agreed with the Proposer's view on consumer benefits for IGT181.

TL noted that the Proposer had not identified any direct cross-Code impacts, although added that as UNC 0854 was intended to apply to both GDN and IGT Supply Points, IGT181 allows for alignment between the two Codes. The Workgroup unanimously agreed with the Proposer's view.

TL noted that the Proposer had not identified any environmental impacts. The Workgroup agreed with the Proposer's view on environmental impacts for IGT181.

TL noted that for the Relevant Objectives, the Proposer had identified a positive impact on Objective (F) – Promotion of efficiency in the implementation and administration of the Code, as IGT181 will align the IGT UNC with the UNC following the implementation of UNC 0854. The Workgroup unanimously agreed with the Proposer's view on the Relevant Objectives.

Implementation

TL advised that the proposed implementation approach will occur in two stages. The first stage will exclude any NTS-related BRs, but the rest of the solution for IGT181 will go live following final approval and the appeals window, whether by the Panel or the Authority. The second stage will go live alongside IGT176, this will see the NTS-related sections of the solution become active. TL noted that depending on the implementation date of IGT176, it is possible that both stages could go live at the same time. The Workgroup unanimously agreed with this approach.

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.

6. 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 took the Workgroup through a presentation following Ofgem's April spring update on Energy Code Reform (ECR), which included early thinking on UNC and IGT UNC consolidation. Building on Ofgem's update and discussions at Panel, AB proposed that RG008 should support consolidation efforts by focusing on more complex sections of the IGT UNC, rather than prioritising only simpler sections. They identified several core areas identified by Ofgem where RG008 could contribute, including the common framework, definitions, general provisions, Modification processes, compliance, credit arrangements, disputes, and derogations. As a next step, AB suggested beginning with Part L (Modification rules), noting that recent changes (such as the prioritisation process) make this a timely area for review. The Workgroup agreed with this proposed approach.

The Workstream completed a collaborative review of IGT UNC Parts CIV and CV, with Members having an action to review this Part ahead of the meeting to identify IGT and IGT UNC-specific provisions.

The Workstream identified the following IGT UNC nuances within Parts CIV and CV:

- BM noted that the equivalent section of Part CIV Paragraph 2 in the UNC refers to non-Central Switching Service (CSS) Supply Points, whereas it does not in the IGT UNC. The Chair noted that whilst non-CSS Supply Points are currently not a concept in the IGT UNC, it will be introduced when IGT176 is implemented. TL advised that they would check the proposed legal text for IGT176 to see if this paragraph is amended. SM noted that there are other clauses relating to non-CSS Supply Points in the equivalent section of the UNC that have been omitted from the IGT UNC, which may need to be examined.
- BM noted that 3.1 points to UNC G 7.1 which refers to a live external management procedure document which is managed outside of the UNC. The Chair asked if this document specifically refers to IGTs or IGT sites. BM confirmed that it does. SM added that the document is managed by the Institution of Gas Engineers and Managers (IGEM).
- BM advised that 3.2 has an outdated reference to UNC G 7.1.3 and they believe it needs to be changed to 7.2.2. TL noted that 3.2 refers to Section H2 of the UNC. AB confirmed that it is referring to Section H, paragraph 2, and SM added that it is written as Section H2 in the UNC.
- BM noted that in 3.4, there is inconsistency with a clause stating paragraph 7.3.3 of Section G shall not apply, with how it is written in the rest of the IGT UNC. There was a similar clause in 6.1. AB noted that 7.3.3 refers to shared supply points.
- BM noted that 6.1 incorrectly refers to Annex 6-3 as Section Annex G-3. This occurs several times in this Part.
- SM noted that 6 omits some references in the equivalent UNC section made to non-CSS Supply Points which will need to be reviewed ahead of the implementation of IGT176.
- BM noted a missing quotation mark in a clause in 6.1 referencing NTS Exit Commodity Charges
- AB noted that Energy Balancing Charges and Siteworks Terms and Conditions are disapplied from 6.1
- BM noted that UNC Section G 7.5.2 has been omitted from 7, and is unsure why, as it refers to CSS Supply Points. TL responded that they would check this clause. The Chair noted that 7 does not point to the equivalent UNC section at all. AB noted that while similar wording appears elsewhere, CSS-related concepts are only lightly referenced in IGT UNC, and the relevant processes (e.g. synchronisation messages) are not clearly embedded, suggesting the omission may be accidental. The Chair queried whether the process is already being operationally performed despite not being in code, raising a potential misalignment between practice and governance. SM indicated this was likely happening but could not confirm and agreed to take this away to the operations team for clarification. The group agreed that, if such activities are being carried out in practice, the Code should be updated to reflect them, potentially via an earlier modification rather than waiting for wider consolidation work

- AB noted that in Part CV 1.2e, Connections Work is defined differently in the IGT UNC and UNC. TL suggested the variation may simply have evolved over time without alignment, while the Chair observed that the wording could imply a meaningful distinction—potentially differentiating between work undertaken by the Pipeline Operator and work carried out by other parties.
- AB noted that in 2.1(a), the UNC replicates the new Supply Meter Point and CDC notification, but does not replicate the effective date based on Siteworks.
- BM noted that 2.4 incorrectly references Paragraph 4.3.7(a) and suggested that it should be 3.4.7(a). There is also an incorrect reference to 5.13.16(a) which should be 5.13.17(a)
- AB advised that 2.4 disapples UNC clauses relating to non-CSS Supply Meter Points.
- AB noted a blank clause, 2.5. TL added that they would check to see if this clause was meant to be removed previously.
- TL noted that Xoserve have recently alerted the Code Administrator of a need for a Modification to amend Paragraph 3.
- BM noted that Paragraph 4 is not replicated in the UNC. The Chair explained that the provision relates to how IGTs manage capacity limits agreed with the distribution network. IGTs operate within a pre-agreed capacity threshold set with the GDN and are responsible for monitoring and managing the total capacity of all connected sites to remain within that limit. This may involve restricting additional capacity or new connections if limits are approached. The Chair noted that while GDNs also manage capacity, they do so by applying for and booking capacity, rather than being given a set threshold.

BM noted that they had taken an informal action to look into Interruptible Supply Points following discussions at the April Workstream meeting. They confirmed that Interruptible Supply Points still exist as a mechanism within the framework, but none are currently contracted, and historically none have been used for IGTs. It was also clarified that interruptible supply points and demand side response are distinct concepts. Interruptible Supply Points involve contractual rights for the GT to shut off gas during planned interruptions, whereas demand side response is a voluntary scheme where consumers reduce usage in return for payment during system constraints.

BM noted that certain legacy terms referenced in IGT UNC (such as Transco Nominated Interruptible (TNI) and Network Sensitive Load (NSL)) no longer exist in the UNC. They added that the underlying functionality has been absorbed into newer frameworks, but without direct replacement terminology, meaning like-for-like updates may not be appropriate. The Chair highlighted that, because the interruptible arrangements in UNC are open to IGT consumers, they should still be considered within the IGT UNC. However, the current drafting appears outdated and may require review or modernisation.

The Workstream agreed to review Part L of the IGT UNC in the June Workstream meeting as part of the next step in the work for RG008. The Chair raised a key caveat that Section L is heavily driven by Transporter Licence Conditions, which may change under Energy Code Reform. AP confirmed that

significant changes are expected as part of Energy Code Reform, but advised the review remains worthwhile to understand and document current differences and rationale, which will support future consolidation. TL added that the aim of the exercise is to identify where and why the codes differ, so this insight can inform Ofgem's consolidation work

Action 26/05 – 01: Ahead of the next Modification Workstream meeting on 11th June 2026, RG008 Members to consider Part L in support of the Phase One identification and logging IGT-specific provisions.

7. Harmonised Prioritisation Process in the Industry Codes

The Chair provided an overview of Ofgem's requirement for all Codes to introduce a formal Modification prioritisation process, noting that this is currently subject to statutory consultation under the Energy Act. Ofgem has confirmed that the required Code changes will take effect from 29th May 2026, after which Codes will have 28 days to adopt the required arrangements. The legal drafting for the IGT UNC will be mandated and non-negotiable, as consultation opportunities have happened outside of Code governance.

It was confirmed that the IGT UNC will mirror the UNC approach to prioritisation to support future alignment with the GNC. Under the proposed framework, Modifications will be categorised as either Standard Priority or High Priority. Standard Priority will remain the default position and reflects current practice, ensuring that no Modification is deprioritised or allowed to fall off the agenda. High Priority will apply only where faster development and implementation than the standard timetable is justified. The existing urgent Modification process remains unchanged and will continue to operate separately, with faster timelines than the high-priority route.

Prioritisation assessments will be based on three criteria: alignment with the Strategic Direction Statement (SDS), the complexity of the Modification, and its importance in terms of value delivery and risk mitigation for Consumers or stakeholders. Modifications aligned with the SDS "Act Now" category are more likely to qualify as High Priority. A scoring mechanism will be used, with reassessment points throughout the Modification lifecycle, including at Draft Modification Report (DMR) and Final Modification Report (FMR) stages, and a mandatory six-monthly review.

Proposers will be required to justify the proposed Priority Category within the Modification Proposal Forms, which have been added to the template. The Code Administrator will act as a Critical Friend in developing the recommendation, with final determination resting with the Panel. High Priority Modifications will receive enhanced scheduling, such as earlier placement on agendas and additional meetings where required, though standard Modifications will continue to progress as normal. An initial retrospective assessment of current Modifications suggested they should all be classified as Standard Priority, as none currently meet all criteria for High Priority.

It was noted that minor refinements to the UNC scoring approach are under consideration following governance discussions, particularly to simplify the assessment and ensure that only SDS "Act Now"

Modifications can be classified as high priority. The IGT UNC will adopt any final UNC changes once confirmed.

TL confirmed that the updated Modification Proposal form is now live and that website updates to accommodate prioritisation (e.g. registers and webpages) are being prepared ahead of the Implementation Date and that parties might start to see changes as early as next week.

STANDING ITEMS

8. Cross Code Modification Implications Tracker

TL provided the Workgroup with updates on in-flight UNC modifications:

Watch List

- [**0933 - Amendment to the designation arrangements outlined within TPD B4.7.16 – 4.7.21 to include a designate as 'Daily Metered' category.**](#) This Modification may have an impact on the IGT UNC as there is a cross reference to the impacted area of the UNC. Impact to IGT UNC Code provisions and Parties to be determined.
- [**0932 - Introduction of a Rolling Annual Quantity \(AQ\) backstop for Class 1 & 2 Supply Meter Points.**](#) This Modification is likely to impact IGTs as parties as a result of changes to the AQ process, which also apply to IGTs. Impacts to IGT UNC Code provisions and Parties is to be determined. Likely to be an automatic application under the IGT UNC due to extensive cross-referencing to UNC on AQ process.
- [**0931 - Introduction of an Escalation process for Transportation invoice payment.**](#) The Code Administrator recommended to UNC Panel that this Modification be marked as impacting the IGT UNC if the process is intended to also apply to IGTs. The IGT UNC has its own provisions that largely mirror TPD V3.3 for late payment but don't have the same for the TPD S3.5 (Value at Risk) so a Modification is needed to align the two Codes with regards to this escalation process.
- [**0926 - Maintenance criteria for Emergency Contact data held in Central Systems.**](#) BM took the Workgroup through a presentation on UNC 0926. The Modification aims to clarify how emergency contact details are managed for supply points, particularly where sites fall below the AQ threshold or where data is provided outside the mandatory scope. It proposes allowing contact details to be retained for up to 12 months in such cases and extending the approach to interruptible supply points for consistency.
- The UNC Modification is already progressing (with workgroup discussions underway and a decision expected later in the year), and alignment with IGT UNC is considered necessary given the intention for the solution to apply to all supply point types. Xoserve indicated they would support drafting and presentation but required a formal sponsor. OC volunteered to sponsor the IGT modification.

- There was discussion on timing, noting that an accelerated submission could enable inclusion in the May Panel cycle, though otherwise it would proceed via June. The group also noted that early discussion at Workgroup could help streamline progression and align timelines with the UNC modification.
- [0923 - Disapplication of TPD Section D7 \(DSR Options\) for 2026 only](#). This Modification is currently out for industry consultation. No impacts identified on the IGT UNC yet but the Code Administrator will check the final legal drafting.
- [0914 - Refining the Class 3 EUC1 read submission rules introduced through Modification 0700](#). The Code Administrator reached out to the Joint Office to discuss the legal drafting and requested that "not used" be put into Code instead of deleting paragraphs and renumbering. The Joint Office has confirmed a change to the UNC 0914 legal drafting and there is no longer a need for an IGT UNC Modification to be raised.

IGT UNC Equivalent Modifications

- [0922 - CDSP Obligations required for the introduction of the Gas Shipper Obligation](#). The first meeting for this joint Workgroup is has not been rescheduled yet, but the Code Administrator will provide an update when possible.
- [0921 - Broadening the definition of the Data Permissions Matrix to align with disclosure of UK Link Gemini data](#). An equivalent IGT UNC Modification has been raised and will be considered by Panel in June. It has been raised as a fast-track Modification.

9. IGT UNC Known Issues Register

TL advised the Workgroup that there were no new updates to the Known Issues Register.

10. IGT UNC Horizon Scanner

TL advised that all of the current Ofgem publications linked to the Code Reform programme have been added to the Horizon Scanner. These changes had also been reflected in the Milestone Timeline sheet.

AOB

The Chair asked the Workgroup to raise any other items for consideration. No items were raised and the Chair closed the meeting.

The next Workgroup meeting is scheduled for Thursday 11th June 2026.

Annex 1 – Actions Table

Reference	Action	Owner	Status
26/04 - 01	<i>Ahead of the next Modification Workstream meeting on 14th May 2026, RG008 Members to consider Parts CIV and CV in support of the Phase One identification and logging IGT-specific provisions.</i>	All	Closed
26/05 - 01	Ahead of the next Modification Workstream meeting on 11 th June 2026, RG008 Members to consider Part L in support of the Phase One identification and logging IGT-specific provisions.	All	Open

DRAFT