

IGT UNC Modification Panel Meeting

Final Minutes

Friday 27th March 2026

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Talan	Code Administrator	Chair
Cher Harris	CH	Indigo Pipelines	Panel Member: Pipeline Operators	
Ellie Osobina	EO	Ofgem	Authority	
Graeme Forbes	GF	Talan	Code Administrator	
Harry Davis	HD	CSL	Observer	Representing Proposer for CSL01
Jenny Rawlinson	JR	BUUK	Panel Member: Pipeline Operators	
Oorlagh Chapman	OC	Centrica	Panel Member: Pipeline Users	
Paul McKie	PM	Joint Office	Observer	
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 apologies received prior to the start of the meeting from Lee Greenwood (LG) (Centrica). It was noted that Oorlagh Chapman (OC) would be acting as LG's alternate.

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). JR added Item 12 – Cross Code Digitalisation Steering Group.

3. Approval of the previous minutes (26-02 and 26-02 Reconvened)

The CA invited comments on the February 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 was one outstanding action:

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. TL advised that the Request for Information (RFI) regarding the implementation of IGT173 was issued on 13th March and will close for responses at 5pm on 27th March. They reminded the Panel that the Code Administrator will collate and analyse all RFI responses received. The anonymised response analysis will then be presented to the Panel at their April 2026 meeting. Panel discussions on the RFI can be found under Item 11. **Action Closed**

Modification Business

5. [CSL01 - Exclusion of Standalone Networks from IGT UNC](#)

TL took the Panel through the Workgroup Report and Draft Modification Report (DMR). 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).

JR queried whether “standalone network” is a formally defined term within the IGT UNC and raised concern about the potential for ambiguity. HD explained that a standalone network is understood to mean a network without a connected System Entry Point (CSEP), i.e. with no connection to the wider GB gas grid. TL confirmed that “standalone network” is not currently a formally defined capitalised term in the IGT UNC or the INC, although the report describes such networks as having no connection to the GB gas grid and shared a supporting diagram provided by the proposer for additional context, which the Proposer took the Panel through.

Further discussion highlighted the risk of future misinterpretation if the term were left undefined. JR and OC suggested that the Modification would be strengthened by explicitly defining “standalone network” in the legal drafting, to future-proof the Code and avoid scope creep. TL confirmed that this could be achieved by amending the legal text, subject to Proposer agreement, without raising a separate Modification. It was agreed that the Modification should return to the Workgroup at its April meeting to refine and agree a clear, standardised definition. CSL01 would then return to Panel in April ahead of potentially being issued for consultation. HD asked about the impact of deferral on the CSL01 timetable. TL confirmed this would delay progress by approximately one month and undertook to confirm revised dates offline.

The Panel reviewed the rest of the CSL01 Workgroup Report, to capture any other areas of the Modification which also may require further Workgroup assessment.

Impacts

TL advised that the Proposer and Workgroup:

- had indicated no impacts to a Significant Code Review or other industry change projects.
- had identified positive consumer impacts, including reduced environmental harm and broader benefits for society.
- had identified both positive and neutral impacts on lower bills for consumers, as existing consumers would not be impacted, only new consumers on the standalone network.
- had not identified any cross-Code impacts.
- 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 noted the Proposer's rationale 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.

TL noted that for the Relevant Objectives, the Proposer and Workgroup had identified positive impacts on Objectives (D) – Securing of effective competition and (F) – Promotion of efficiency in the implementation and administration of the Code.

The Panel had no comments on the impacts or Relevant Objectives for CSL01.

Implementation

TL advised that with no systems or process changes required, the implementation can be immediate once the proposal is accepted and could be implemented as part of a standalone Release or a scheduled Release. TL added 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 noted that the Workgroup had agreed on an implementation approach of one working day after the 15-day working day appeal has ended following Ofgem's published decision.

The Panel had no comments regarding the implementation approach for CSL01.

Governance

TL advised that the Proposer and Workgroup had suggested that CSL01 be subject to an Authority Decision. The Panel had no comments regarding the governance route for CSL01.

Determinations

The Panel unanimously agreed to:

- send CSL01 back to the April Workgroup meeting for further assessment of the legal text.

6. Workgroup Summary Report

The Panel reviewed the Workgroup Summary Report and had no comments to add.

Authority Updates

7. Authority Update

EO provided the following updates from the Authority:

Several key publications in the coming weeks will move the programme forward:

- **Energy code reform: Government and Ofgem response to the consultation on code manager licence conditions and code modification appeals to the CMA** – a joint-DESNZ-Ofgem publication that sets the regulatory foundations of the reform, including the new code manager licence conditions. Planned date: By the end of March 2026
- **Energy code reform phase 1: transitional measures and consequential changes** – establishing the transitional measures required to ensure a smooth move to the new model and day-one readiness, seeking stakeholder views on the required code changes. Planned date: By the end of March 2026
- **Consultation on the second preliminary Strategic Direction Statement (SDS)** - In April Ofgem will consult on their second Strategic Direction Statement (SDS), setting a clear and ambitious direction for industry on how codes must evolve to deliver strategic priorities for consumers and support the transition to net zero in the years ahead. Planned date: By end of April 2026
- Ofgem are also aiming to publish the EA23 decision notice on prioritisation by early May.

On 16 March, Ofgem published their decision on competitive Code Manager selection and updated their guidance on Code Manager selection. The decisions set out in this document are intended to enable Ofgem to run competitive Code Manager selection exercises in the second and third phase of Energy Code Reform, if they determine that a competition would be in the best interests of the industry and consumers. [Energy code reform: competitive code manager selection | Ofgem](#)

On 6th March 2026, Ofgem issued a call for expressions of interest to join the code consolidation workgroups (CCW) for phase 2, which are planned to begin later this summer. Ofgem are seeking participation from any person who is interested in helping them develop the modifications required to create a consolidated electricity commercial code or a consolidated gas network code. If you would like to express interest in participating in the CCW, please review the draft terms of reference and then let Ofgem know by emailing industrycodes@ofgem.gov.uk by 17 April 2026.

[Implementation of energy code reform: template code text | Ofgem](#)

On 6th March 2026, Ofgem published the Implementation of Energy Code Reform: second decision. This decision sets out their approach to implementing the industry code governance reforms as set out in the Energy Act 2023. This document summarises respondents' views on the Implementation of Energy Code Reform: Second consultation and sets out their decisions. It also consults on the proposed code text for the future code modification process and the Stakeholder Advisory Forum (SAF), which reflects the policy positions in this document. Response deadline: 17 April 2026

<https://www.ofgem.gov.uk/consultation/energy-code-reform-second-implementation-consultation>

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 updated expected decision date of 15th April 2026 for [IGT165 - Independent Shrinkage Expert and Independent Shrinkage Charge](#).

AOB

9. **Code Consolidation Update**

GF and PM provided an update on work relating to Code Consolidation. GF explained that Xoserve, in partnership with Encoder (the Joint Office) and Talan, has submitted an expression of interest to Ofgem to become the licensed Code Manager for the new unified Gas Network Code (GNC). They emphasised that this proposal sits alongside multiple parallel workstreams, noting in particular that business-as-usual (BAU) activities must continue for both the UNC and IGT UNC until any formal handover occurs, regardless of who is appointed as the licensed Code Manager. They also confirmed that work to bring the two codes together will progress independently of the outcome of the licensed Code Manager process, potentially over the next couple of years.

PM highlighted related activity within the UNC Governance Workgroup, to consider BAU arrangements and Code reform. They noted that early discussions had taken place and that the Workgroup is open to all interested parties. JR confirmed they had attended the session, reporting strong attendance and productive discussions, with outputs intended to feed into Ofgem-led work. They acknowledged that some Shipper representatives were absent due to clashes or leave but noted general support among those Shippers present.

The Chair asked about the scope of the governance workgroup and its relevance to IGT UNC. JR explained that while the terms of reference are primarily UNC-focused, there is clear overlap with IGT UNC, particularly for gas transporters, and added that they believed that the IGT UNC Code Administrators' participation would be valuable. The Chair queried whether parties to the IGT UNC should be explicitly informed, to ensure awareness that discussions were taking place which could affect them. There was agreement that further coordination between the Joint Office and the Code Administrator would be helpful and that a single, joined-up group was preferable to separate UNC and IGT UNC forums. The Chair advised that they would follow up directly with the Joint Office.

GF stressed that the current stage is not a formal procurement but an expression-of-interest process, giving industry parties an opportunity to contribute views on the future shape of the licensed Code Manager, including governance and funding arrangements. They encouraged stakeholders, particularly IGTs, to engage early, noting that the opportunity to influence direction is likely to narrow if the process moves into a formal competition or award phase. They offered to engage directly with

stakeholders and the Chair added that proactive outreach to parties was planned to support awareness and engagement.

10. Updates to CaCoP Principles

TL took the Panel through the proposed updates to the Code Administrator Code of Practice (CaCoP) Principles document. They advised that the updated had not been published ahead of the meeting as Ofgem do not wish to make the proposals public yet and are just requesting early feedback from Code Panel members. The Chair asked HD, a meeting Observer, to leave the meeting for this item.

TL explained that the proposals would be discussed at the CaCoP Forum meeting in April and asked for any Panel comments by 10th April. They outlined that feedback would be reviewed by CaCoP Forum members, refinements made as appropriate, and the amended document then submitted to Ofgem for consideration through its usual approval process. While no formal timeline had been provided by Ofgem, TL suggested that past decisions had been received within a few months of submission. They invited Panel Members to raise questions either during or after the meeting and confirmed availability to respond to queries ahead of the deadline.

11. IGT173 RFI Update

TL advised that the Request for Information (RFI) regarding the implementation of IGT173 was published on 13th March and will close for responses at 5pm on 27th March. They reminded the Panel that the Code Administrator will collate and analyse all RFI responses received. The anonymised response analysis will then be presented to the Panel at their April 2026 meeting.

OC confirmed that from Centrica's perspective, there is no issue with receiving RPC data via the IX when it is compliant, and that problems only arise where the data submitted by other parties is faulty or non-compliant. TL acknowledged this.

TL reported that six responses had been received to date: four from IGTs and two from Shippers. They noted that this was fewer than in the previous RFI, despite reminders being issued. They explained that responses would be anonymised but categorised (for example by IGT or Shipper grouping) to allow trends to be identified without naming parties. They noted that some feedback suggested certain Shippers were requesting RPC data by email rather than via the IX. At the time of the meeting, detailed analysis had not yet been completed. TL confirmed they could follow up with known non-respondents, including via IGT contract managers or individual Shipper contacts, if the Panel wished.

OC asked about the next steps following the closure of the RFI. TL explained that, as with the previous RFI, the main option available would be to consider escalation to Ofgem. They noted that the IGT UNC Code contains no non-compliance provisions, meaning there is no formal enforcement action available to the Panel or Code Administrator. The review would therefore focus on whether

non-compliance has persisted since implementation and whether the same parties continue to be involved. They outlined that further follow-up questions could be issued to respondents if greater detail was required.

JR asked whether there is any obligation on parties to respond to RFIs. TL confirmed there is no mandated requirement, though they reiterated that they could attempt further engagement with non-responding parties. TL indicated that they would time any follow-up activity to allow parties sufficient opportunity to respond following the bank holiday period.

CH asked whether the absence of compliance provisions prevents the Panel from taking informal steps, such as inviting persistently non-compliant parties to attend Panel to explain their position. The Chair confirmed there is nothing preventing such invitations, but equally no obligation for parties to attend. The Chair noted that escalation to Ofgem remains an available route and suggested that informing parties of an intention to escalate could be considered if non-compliance continues. The Chair also observed that current performance assurance arrangements focus on settlement accuracy and do not address this type of non-compliance, but that this gap is likely to be addressed through future Code Reform. They noted that the current situation demonstrates the need for stronger governance arrangements. There was general agreement that the appropriate response would depend on the outcomes of the RFI analysis, including whether non-compliance is widespread or persistent.

12. Cross Code Digitalisation Steering Group

JR provided an update to Panel on the latest meeting of the Cross Code Digitalisation Steering Group (CCDSG) held in early March. They explained that the meeting focused on stakeholder views regarding barriers to adopting Data Best Practice (DBP), with attendees invited to share issues from their respective Codes. The session also included the usual updates from industry participants on digitalisation activity within their organisations.

JR reported that an update was provided on Ofgem's decision published on 14 January, following consultation on applying licence conditions related to DBP. They explained that, rather than applying these obligations to Code Administrators, Ofgem has decided they will instead apply to licensed Code Managers. These requirements will be implemented on a staggered basis as Code Managers are licensed.

The Chair suggested that it would be useful to ensure the Code Administrator continues to be represented at future CCDSG meetings.

The next IGT UNC Panel meeting is scheduled for Friday 24th April 2026.

Annex 1 – Actions Table

Reference	Action	Owner	Status
26/02 – 01	<i>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</i>	Code Administrator	Closed