IGT UNC Modification Panel Meeting

Draft Minutes

Wednesday 1st July 2026

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Talan	Code Administrator	Chair
Ben Giblin	BG	Talan	Observer	
Cher Harris	CH	Indigo Pipelines	Panel Member: Pipeline Operators	
Graeme Forbes	GF	Talan	Code Administrator	
Jenny Rawlinson	JR	BUUK	Panel Member: Pipeline Operators	
Kathryn Adeseye	KA	Xoserve	Observer	
Nadir Hafeez	NH	Ofgem	Authority	
Oorlagh Chapman	OC	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 apologies received prior to the start of the meeting from Ellie Osobina (EO) (Ofgem) and Paul McKie (PM) (Joint Office).

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). No items were raised.

3. Approval of the previous minutes (26-05 and 26-05 Reconvened)

The CA invited comments on the May 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:

26/05 – 01: Code Administrator to publish IGT UNC Panel Membership term dates on the IGT UNC website. TL advised that the IGT UNC Panel Membership term dates have been published on the IGT UNC website. Action closed.

Modification Business

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

TL took the Panel through the Final Modification Report (FMR) and consultation responses. TL noted that IGT181 mirrors UNC 0854, which was approved in May 2024, and this Modification seeks to align the IGT UNC with the UNC. LB explained that UNC 0854 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.

TL advised that four consultation responses were received: three from IGTs and one from NESO. All three IGT respondents agreed that the Modification should proceed via Self-Governance procedures. TL highlighted that respondents had been asked to consider Ofgem's previous statement that it had no current concerns with Self-Governance, whilst retaining the ability to call in the Modification for an Authority Review if required. NESO acknowledged the case for Self-Governance and did not identify any material impacts, although it noted that a light-touch review by the Authority would not be objectionable.

All respondents supported assigning the Modification a Standard Priority Category and unanimously supported implementation of the proposal. Respondents considered that the change would align the IGT UNC with equivalent UNC provisions, ensure consistent protections across IGT and GDN Supply Points, strengthen arrangements for managing risks associated with government sanctions, and support greater alignment between the Codes ahead of future Code consolidation.
There was unanimous agreement that the legal drafting accurately reflected the intent of the Modification. One respondent specifically endorsed the proposed two-phase implementation approach, which is necessary because some provisions depend on the implementation of related UNC and IGT UNC Modifications concerning National Transmission System (NTS) Direct Connect arrangements. Under this approach, the majority of the legal text changes would be implemented initially, with a small number of consequential provisions deferred until the related Modifications have a confirmed implementation date.
All three IGT respondents supported the proposed implementation approach. NESO did not express a view, noting that it was not directly impacted by the change. Respondents also agreed that the

Modification would not introduce any significant direct implementation costs or impacts. While NESO noted that there had been implementation activity associated with the original Modification and related XRN development, it did not identify any additional costs arising from this proposal.

Governance

TL noted that extensive discussion had taken place on the governance route for IGT181, noting that the Panel had been split during the initial assessment of the Modification. While some Workgroup members supported Authority Determination due to the need to assess the Modification independently of the UNC, others favoured Self-Governance but raised concerns around timing, geopolitical risks, and potential urgency. JR noted that the vast majority of consultation responses had supported Self-Governance and no new issues had been raised. NH advised that the Ofgem Gas Policy team had reviewed the Modification and were happy for it to proceed via Self-Governance.

The Panel unanimously voted that IGT181 should be subject to Self-Governance.

Prioritisation

The Chair advised that the Proposer had determined that IGT181 does not align with the Strategic Design Statement (SDS) and is deemed to be of low complexity and importance. Therefore, IGT181 should be categorised as a Standard Priority Modification. The Panel unanimously voted that IGt181 should be categorised as a Standard Priority Modification.

Impacts

TL advised that the Proposer and Workgroup had indicated no impacts to a SCR or other industry change projects. The Panel agreed that there are no impacts.

TL advised that the Proposer and Workgroup had identified positive consumer impacts, including lower bills for consumers, as this Modification would enable National Gas Transmission (NGT) to secure additional gas supplies at lower than usual costs, and benefits for society as a whole. The Panel had no comments on the identified consumer impacts.

TL advised that the Proposer and Workgroup had not identified any cross-Code impacts. The Panel agreed.

TL advised that the Proposer and Workgroup had not identified any environmental impacts. The Panel agreed.

TL noted that for the Relevant Objectives, the Proposer and Workgroup had identified a positive impact on Objective (F), as this Modification will further align the IGT UNC with the UNC. The Panel unanimously agreed with the views on the Relevant Objectives for IGT181.

Implementation

The Panel unanimously agreed with the proposed phased implementation approach, with the first phase being implemented following the 15-day Appeal Window, and the second phase being implemented alongside IGT176. TL noted that given the Panel have supported IGT181 being a Self-Governance Modification, the day following the appeal window ending will be 23rd July, which will be the proposed implementation date for the first phase of IGT181. TL noted that IGT176 is expected to be implemented in August, and the second phase will be implemented alongside this Modification.

Determinations:

The Panel unanimously agreed that:

- IGT181 does not have an impact on any SCRs or other industry projects;
- IGT181 is a Self-Governance Modification Proposal;
- the impacts and costs set out in the report are accurate and appropriate, and they had
- nothing new to add;
- IGT181 will have a positive impact on Objective (F);
- IGT181 should be treated as Standard priority;
- with the proposed phased implementation approach; and
- the legal text delivers the intention of the solution.

The Panel unanimously agreed that:

- that IGT181 should be implemented.

6. IGT182 - Alignment of the IGT UNC with the UNC definition of the Data Permissions Matrix

TL took the Panel through the FMR for IGT182. They explained that IGT182 is a housekeeping change to align the IGT UNC definition of the Data Permissions Matrix (DPM) with the equivalent definition already implemented through UNC 0921. UNC 0921 amended the definition by replacing a specific reference to the Supply Point Register with a broader reference to UK Link, ensuring the definition more accurately reflects the categories of data held within the system. As the IGT UNC contains the definition in full rather than referencing the UNC definition directly, a separate Modification was required to maintain alignment between the two codes.

TL explained that UNC 0921 had already been implemented in June, leaving the IGT UNC definition outdated and inconsistent. They therefore considered the proposal to satisfy the Fast Track Self-Governance criteria, as it simply corrected obsolete text and aligned the Code with an already approved and implemented UNC change.

Impacts

TL advised that no impacts were identified on Consumers, environmental objectives, Significant Code Reviews, or other industry Codes. The Modification was described as a mirror change with no material impacts.

TL noted that for the Relevant Objectives, the Proposer had identified a positive impact on Objective (F), as this Modification will further align the IGT UNC with the UNC. The Panel unanimously agreed with the views on the Relevant Objectives for IGT182.

Prioritisation

TL noted that the proposal had therefore been submitted as a Fast Track Self-Governance Modification and was not subject to the IGT UNC's prioritisation criteria process.

Implementation

Implementation was proposed for one working day after the expiry of the 15-working-day appeal window, aligning with the implementation approach used for IGT181 and allowing the change to be included within the planned extraordinary release on 23rd July. The Panel unanimously agreed with the implementation approach.

JR queried whether Fast Track Self-Governance Modifications required Ofgem's agreement under Section 12.3 of the IGT UNC. TL responded that they had interpreted the requirement as being fulfilled through the mandatory 15-working-day objection period, which was the reason the Modification had not been brought to the June Panel meeting. The Chair confirmed that Ofgem had been included as an affected party and had therefore received the Modification Proposal through the standard industry Codes communication process. JR requested that this Governance point be explicitly recorded within the FMR for completeness.

TL added that the extended objection period had been observed specifically to comply with the Fast Track Self-Governance process. It was also confirmed that no objections had been received during that period, either from Ofgem or any other affected party, regarding the proposal's Fast Track status. TL agreed to update the report to record that the required notice period had been completed and that no objections had been raised.

Panel members noted that Fast Track Self-Governance modifications are rare under the IGT UNC and acknowledged the value of recording the governance process clearly within the report. JR's observation was welcomed as a useful addition to ensure the decision-making process was fully documented.

Legal Text

TL took the Panel through the proposed legal text changes, confirming that the Modification consisted solely of replacing the term “Supply Point Register” with “UK Link” within the Data Permissions Matrix definition in Part N 2.5. They noted that the change mirrored UNC 0921 exactly and had been raised solely to maintain alignment between the two Codes.

Governance

TL reminded the Panel that the Modification had been raised as a Fast Track Self-Governance Proposal. The Chair advised that the Panel would need to approve this governance route for IGT182. The Panel unanimously agreed that IGT182 should proceed as a Fast Track Self-Governance Modification.

Determinations:

The Panel considered the IGT182 FMR and unanimously agreed that:

- IGT182 does not have an impact on any SCRs or other industry projects;
- IGT182 is a Fast Track Self-Governance Modification;
- impacts and costs set out in the report are accurate and appropriate;
- IGT182 will have a positive impact on Objective (F);
- with the proposed implementation approach; and
- the legal text delivers the intention of the solution.

The Panel unanimously agreed that:

- that IGT182 should be implemented.

7. RG009 – Introduction of Qualification Requirements for new Shippers

BG introduced the new Review request to the Panel. They advised that RG009 will look to examine the potential introduction of qualification requirements for new Shippers entering the gas market. BG explained that, under the current UNC and IGT UNC arrangements, there are no mandatory assurance checks on a prospective Shipper’s systems, business processes, staff knowledge, or operational capability before they begin operating in the market. Organisations can accede to the Code and establish system connections without any formal assessment of their readiness. RG009 therefore seeks to explore whether qualification requirements should be introduced to assess whether new entrants have appropriate systems, processes, competence, and resources in place before commencing operations.

BG noted that an equivalent UNC Review, UNC 0938R, had already been raised following work undertaken by the Performance Assurance Committee (PAC) to compare market entry requirements across industry Codes. That review found that the UNC and IGT UNC lacked mandatory qualification arrangements that were present in several other industry codes. As a result, the PAC requested further investigation, and the UNC Modification Panel agreed for the issue to be considered through a Review Group over a 12-month period. Given the planned consolidation of the UNC and IGT UNC under the Gas Network Code, it has been proposed that the IGT UNC undertake an equivalent review so that discussions could be progressed jointly.

BG outlined five key areas that the Review Group would examine. The first area is scope, including the level of capability, knowledge, competence, systems, and business arrangements that market entrants should be expected to demonstrate prior to entering the market. This would also consider whether practical testing should be undertaken to verify a participant's ability to process and submit settlement data accurately.

The second area concerns approach, including the methods by which compliance would be assessed and evidenced. This would involve consideration of the types of assessment that may be appropriate, the level of evidence required to demonstrate readiness, and how qualification activities should be funded.

The remaining areas relate to proportionality, approval, and ongoing assurance. The Review Group will consider whether qualification requirements should be risk-based, the extent to which a governance body such as PAC should have authority to prevent market entry where requirements are not met, and whether assurance activities should continue after a participant has entered the market rather than only being undertaken at the point of entry.

BG also provided examples of why qualification requirements may be beneficial. Historical analysis undertaken by PAC identified cases where significant performance issues persisted for extended periods before it became apparent that the underlying cause was a lack of knowledge or operational capability. Earlier assessment of competency could therefore have reduced the need for prolonged intervention and allowed PAC to focus resources on other settlement issues.

BG further highlighted examples from 2021 and 2022 when a number of Shippers entered and subsequently exited the market. In several cases, Suppliers that assumed responsibility for sites from failing Shippers experienced declining performance because of operational issues inherited from those organisations. BG suggested that introducing minimum qualifications relating to knowledge, systems, processes, and capability could improve industry resilience and reduce the negative impacts associated with future market exits or transfers of responsibility.

TL took the Panel through the Review Request Form. They clarified that, although the review would be conducted through a joint UNC and IGT UNC Review Group, the two reviews would technically remain separate because the Codes had not yet formally merged. As a result, any outputs, recommendations or future modification proposals would remain Code-specific until the implementation of the Gas Network Code. However, from an administrative perspective, the Joint Office and Talan would operate a shared Review Group process to enable all interested parties to participate through a single forum.

The Panel was advised that the Review Group would operate as a standalone group rather than under an existing governance structure. Meetings would be hosted by the Joint Office and scheduled alongside existing PAC meeting dates to maximise stakeholder participation. The first meeting was confirmed for 14th July, with meeting arrangements designed to allow PAC members and other interested parties to attend efficiently. TL explained that details, links and supporting information for the joint meetings would be published on both the IGT UNC and Joint Office websites to ensure transparency and accessibility.

To maintain oversight, TL confirmed that updates on the review's progress would be provided through the regular Workgroup summary reports presented to Panel. OC~~The Chair added that Paul McKie~~ requested that the matter also be included as a standing quarterly update item on future Panel agendas. TL agreed to take an action to introduce quarterly progress updates in addition to the Workgroup summaries.

NH asked about the equivalent UNC review. TL confirmed that UNC 0938R had already been raised and was proceeding on the same basis. BG added that discussions had already taken place with some Ofgem representatives to ensure alignment with wider Code reform activity and to avoid overlap or conflict with Ofgem's work. TL added that separate discussions were also taking place between Ofgem, the Joint Office and the Code Administrator regarding related aspects of Code reform, meaning there were several channels through which coordination was being maintained.

<u>Determinations:</u>
The Panel unanimously agreed that:

- RG009 should be sent to a Joint Review Group with UNC 0938R for assessment.

<u>Updates from Workgroup</u>

8. Workgroup Summary Report

TL advised that an update on IGT180 had been included within the Workgroup Summary. They added that due to a delay in DESNZ publishing their response to the Gas Shipper Obligation (GSO) consultation, there was no longer sufficient time to progress IGT180 ahead of the proposed go-live date in 2027. Instead, a new Modification will be raised, this will cover the enduring GSO solution. The Panel reviewed the Workgroup Summary Report and had no questions or comments to add.

Authority Updates

9. Authority Update

NH provided the following updates from the Authority:

Ofgem sought expressions of interest from any person interested in becoming a Code Manager candidate for the Consolidated Electricity Commercial Code and Gas Network Code in January 2026.

After careful consideration of all responses, Ofgem have decided the following:

- to consider the Retail Energy Code Company for selection on a non-competitive basis for the Electricity Commercial Code, and
- to consider Xoserve, in partnership with Encodar (as the Joint Office of Gas Transporters) and Talan, for selection on a non-competitive basis for the Gas Network Code.

Both candidates have now been invited to submit licensing assessment forms for the relevant Code. Ofgem will then consider this information and publish a notice stating whether they propose to grant them a Code Manager licence, which will be subject to stakeholder representations.

Ofgem also welcome the commitment of all incumbent Code Administrators to supporting a successful phase two transition. Their experience with phase one of energy code reform has demonstrated that the expertise and operational insight of these organisations, and their respective panels, will be critical to delivering a smooth and orderly transition. Ofgem will update in due course on their anticipated timescales for key activities.

10. Ofgem's Expected Decision Dates (EDD)

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

- There is an updated expected decision date of 31st August 2026 for CSL01 – Exclusion of Standalone Networks from IGT UNC.

AOB

11. Code Consolidation Update

GF reflected on the appointment of the Gas Network Code (GNC) delivery team, noting that whilst selection was a significant milestone, the real challenge now lay in demonstrating that the decision was well-founded through successful delivery. They emphasised the importance of Xoserve, Talan and Encoder working collaboratively to deliver a genuinely transformative outcome.

GF also highlighted two key priorities for industry stakeholders. Firstly, they stressed the need to bring the UNC and IGT UNC together as quickly as practicable, both in terms of Code content and the

supporting governance processes, to create a more cohesive, understandable and efficient market framework. Secondly, they urged IGTs to engage actively in the development of the new arrangements rather than remaining passive observers. They warned that failing to participate in the transition and governance design process could lead to adverse consequences in the future, despite any short-term resource savings.
JR agreed with these observations and noted that the RG008 work was already identifying and recording key differences between the Codes that would support future consolidation and rationalisation activities. They distinguished between Code consolidation, which would bring the UNC and IGT UNC together, and Code rationalisation, where the new Code Manager may seek to standardise areas where the IGT and GDN provisions currently differ. They added that any rationalisation should only take place where there was a clear and justified reason to do so.
GF agreed, suggesting that around 80% of future arrangements could likely be standardised through common processes, systems and approaches, while approximately 20% would remain unique to the gas sector and particularly to IGTs. JR reinforced this point using metering as an example, noting that while smart metering may eventually move away from Code governance, significant questions remained around the treatment of legacy metering arrangements, which were likely to become an important area of future discussion.

OC also echoed GF's call for engagement, stressing that Shippers must remain actively involved in the GNC development process alongside GDNs and IGTs to ensure their interests are represented and that information is effectively fed back to the wider Shipper community. JR agreed, noting that many IGT-specific processes, such as new connections, have direct implications for Shippers and therefore require their continued participation.

12. Update on IGT173 Non-Compliance

TL provided an update on IGT173 - Gateway Delivery for RPC Data, which introduced a requirement for Relative Price Control (RPC) backing data to be exchanged via the IX rather than email. Following implementation in 2024, concerns were raised about inconsistent compliance, prompting two Requests for Information (RFIs) to be issued to industry participants.

The initial RFI found a number of both Shippers and IGTs were not fully complying with the requirements. Issues included Shippers continuing to request data via email, IGTs not sending data through the IX, only partially providing the required information, or supplying data in a format that did not meet expectations.

The second RFI issued earlier this year generated stronger engagement and showed a reduction in non-compliance. No Shipper-related issues were reported by IGTs; however, five IGTs were still identified as either not providing RPC data through the IX, only doing so inconsistently, or supplying information that did not meet Shipper expectations.

As there are limited formal enforcement mechanisms available under the Code, TL undertook direct engagement with the parties involved. They contacted the five IGTs to make them aware of the concerns that had been raised and offered support where implementation difficulties remained. They also obtained agreement from one Shipper to engage directly with the affected IGTs.
This approach had largely produced positive results. Four of the five IGTs had actively engaged with the Shipper and appeared either to have resolved the issues raised or to be progressing discussions towards resolution. Only one IGT had not responded despite follow-up communications. TL noted that some IGTs had been unaware that Shippers were experiencing issues, suggesting that direct engagement had been valuable in improving understanding and compliance.

To assess whether the changes have resulted in tangible improvements, TL intends to seek feedback from the affected Shippers after sufficient time has passed for invoice runs to occur. They will also contact other Shippers who had reported similar issues to determine whether improvements have been seen more broadly across the market. A further verbal update is expected in approximately two months, with early indications suggesting that the direct-engagement approach has been effective and could be used again if similar compliance concerns arise in the future.

13. June 2026 IGT UNC Release Confirmation

TL confirmed that the latest IGT UNC release went live as scheduled on 26th June 2026. There was one Modification implemented in this release, IGT174 – Update of IGT UNC Code Communication Methods. There are minor changes to the IGT UNC Code and other Ancillary Documents to replace any references to fax with an alternate communication method (email).

14. IGT UNC Panel Membership Update

The Chair informed the Panel that following the closure of the Shipper Representative nomination period, one nomination had been received for Oorlagh Chapman (OC) (Centrica), and they had now been officially elected as a new Shipper representative on the IGT UNC Panel, commencing from 1st July 2026. The Chair noted that the other two Shipper Panel roles remain vacant and added that the CA have intermittently advertised the vacant Shipper Panel roles to their distribution list and will continue to do so.

JR informed the Panel that they had resigned from their role as IGT Representative on the IGT UNC Panel, and this would be their final meeting. They advised that Aleksis Butler (BUUK) would be covering the role as an alternate until the Independent Networks Association (INA) could hold an election for a new IGT Representative. The Panel thanked JR for their hard work and commitment to their role as IGT Representative and wished them well for the future.

GF informed the Panel that they were leaving Talan and subsequently leaving their role on the IGT UNC Panel, and this would be their final meeting. The Chair advised that updates on Code Consolidation at future Panel meetings will be provided by Paul McKie (Encodar/Joint Office) and TL would be covering the Data Best Practice work with Ofgem on behalf of the Code Administrator. The Panel thanked GF for their hard work and commitment to their role working on Code Consolidation and wished them well for the future.

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

Annex 1 – Actions Table

Reference	Action	Owner	Status
26/05 - 01	***Code Administrator to publish IGT UNC Panel Membership term dates on the IGT UNC website***	***Code Administrator***	***Closed***