

IGT UNC Interim Review Report		At what stage is this document in the process?
RG008: IGT UNC Code Review in preparation for Code Manager and Code Consolidation		01 Review Request 02 Draft Review Report 03 Final Review Report
Purpose of Request: This Review looks to commence IGT UNC preparatory activity ahead of the Code Manager appointment and the subsequent Code Consolidation work that will be undertaken as part of Code Reform and the introduction of the Unified Gas Network Code (UGNC).		
	This document is an Interim Review Group Report which provides an update on the progress of RG008. This report will be presented to the Panel for information on 24th July 2026.	
	High Impact: IGT UNC	
	Medium Impact: IGTs, Shippers, Suppliers	
	Low Impact: CDSP	

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About this document:

This document is an Interim Review Group Report which provides an update on the progress of RG008.

This report will be presented to the Panel on 24th July 2026 for information.



Any questions?

Contact:

Code Administrator



IGTUNC@talan.com



02070901044

Proposer:

Insert name



email address



telephone

Other:

Insert name



email address.



telephone

Other:

Insert name



email address.



telephone

Other:

Insert name



email address.



telephone

1 Summary of Review

Why is the Review Request being made?

The purpose of this Review is to commence IGT UNC preparatory activity ahead of the Code Manager appointment and the subsequent Code Consolidation work that will be undertaken as part of Code Reform and the introduction of the UGNC. Collaborative working by the Review Group will define the most effective approach and it is expected that the approach might include the following:

- A review of the entirety of the IGT UNC in consideration of Code Consolidation. Work is already being undertaken in the UNC, with housekeeping changes being made to essentially 'clean up' the Code ahead of the Code Manager being introduced.

The Review Group would look to assess and consider the following:

- Correcting errors – be this pointing to UNC, grammatical, which would fall into housekeeping changes.
- A view to ensuring that any IGT specific governance within the IGT UNC, when transitioning to the new UGNC, is prepared and able to standalone as schedules in the new Code.
- Ensuring that the governance works where it refers to the UNC. This would look to explore whether the direct referencing of the UNC within the IGT UNC still works and is aligned.¹

The work this Review Group would look to achieve would be at the benefit of the Gas Code Manager and the Authority. The groundwork we would look to deliver would allow the Code Manager an easier start in undertaking the Code Consolidation work that will come after their appointment.

Scope

We would recommend that the scope of this Review is the entirety of the IGT UNC (including Ancillary Documents, guidance and process documents).

Impacts & Costs

The Review is not expected to create system costs. The main impact is administrative, requiring the Code Administrator and Workgroup to review and recommend changes.

It would be worth noting that benefits could include a cleaner, more robust Code, which could help reduce the risk of errors or misinterpretation during and after Code Manager implementation, and Code Consolidation.

Recommendations

It is recommended that this Review is progressed to a Workgroup for review to ensure that any possible preparatory work can be undertaken to the IGT UNC in advance of the Code Manager appointment, and Code Consolidation.

¹ This will likely have to be completed last, given the changing nature of the UNC, and worth keeping in mind.

Additional Information

This Review will support the wider industry programme of Code Governance Reform, helping to reduce complexity and fragmentation by ensuring the IGT UNC is aligned where needed with the UNC.

2 Impacts and Costs

Consideration of Wider Industry Impacts

The Review supports gas Code consolidation and wider Ofgem objectives for Code simplification. It will deliver industry benefit by ensuring smooth transition without duplicative or inconsistent provisions.

Impacts

Impact on Central Systems and Process	
Central System/Process	Potential impact
UK Link	No direct system changes anticipated
Operational Processes	No direct operational process changes anticipated

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	Positive impact – correction of errors and providing clarity on governance. Impact would be purely administrative rather than operational.
Development, capital and operating costs	N/A
Contractual risks	N/A
Legislative, regulatory and contractual obligations and relationships	TBC

Impact on Transporters	
Area of IGT business	Potential impact
System operation	N/A
Development, capital and operating costs	N/A
Recovery of costs	N/A
Price regulation	N/A
Contractual risks	N/A
Legislative, regulatory and contractual obligations and relationships	TBC
Standards of service	N/A

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	N/A
IGT UNC Panel	N/A
General administration	Positive – better readiness for consolidated governance

Impact on Code	
Code section	Potential impact
	TBC – corrections, and updates expected across the IGT UNC sections

Impact on IGT UNC Related Documents and Other Referenced Documents	
Related Document(s)	Potential impact
	TBC – corrections, and updates expected across the IGT UNC sections

Other Impacts	
Item impacted	Potential impact
Security of Supply	N/A
Operation of the Total System	N/A
Industry fragmentation	N/A

3 Terms of Reference

Objective of the Review Group

The proposed objective of the Review Group is to commence IGT UNC preparatory activity ahead of the Code Manager and the subsequent Code Consolidations work that will be undertaken including, but not limited to, the following:

- Development of solutions to assist Code Manager in their work to consolidate Codes;
- Consideration of potential changes required at the request of Ofgem for Code Reform;
- Assessment of potential impacts of the Review; and
- Assessment of legal text.

Work Approach

- **Phase 1:** Identify IGT UNC nuances to those of the UNC. For example, Metering, New Connections process, invoicing; and
- **Phase 2:** Correcting errors (i.e. housekeeping changes) and ensuring that the governance works where it refers to the UNC. This would look to explore whether the direct referencing of the UNC within the IGT UNC still works and is aligned.

Scope

- **In Scope:** The scope of the Review will cover, as minimum, the main IGT UNC document, Ancillary, Guidance, Process documents and templates used by IGT UNC parties. It is likely that Modifications could be raised whilst progressing the review, Consideration to be given to potential changes required at the request of Ofgem for Code Reform.
- **Out of Scope:** The Review will not look to change existing and/or future governance, unless deemed relevant as the Review Group progresses.

Outputs

Produce a Review Report for submission to the Modification Panel, containing the assessment and recommendations of the Review Group including a draft Modification(s) where appropriate.

We would suggest that feedback and updates are provided to IGT UNC Panel on a monthly basis, with the ability to raise draft Modifications where needed.

Composition and operation of Review Group

The Workgroup is open to any party that wishes to attend or participate but will be dependent on the direction the Review Group decides to take in terms of operation.

It is proposed that the Review Group should comprise of attendees at the regularly scheduled Modification Workstream meetings, plus others who wish to attend. The Review Group will not require quoracy as it is not a decision-making group. Review Group meetings will still proceed, even if a full Workstream is not in attendance.

Meeting Arrangements

Meetings will be administered by the Code Administrator and conducted in accordance with the Code Administration Code of Practice.

Topics for Discussion

- Understanding the objective
- Assessment of alternative means to achieve objective
- Development of Solution (including business rules if appropriate)
- Assessment of potential impacts of the Request
- Benefit of alignment with UNC
- Assessment of legal text.

Outputs

Produce a Workgroup Report for submission to the Modification Panel, containing the assessment and recommendations of the Workgroup including a draft modification where appropriate.

Composition of Workgroup

The Workgroup is open to any party that wishes to attend or participate.

A Workgroup meeting will be quorate provided at least two Transporter and two User representatives are present.

Meeting Arrangements

Meetings will be administered by the Code Administrator and conducted in accordance with the Code Administration Code of Practice.

4 Review Group Discussions & Conclusions

February 2026

The Proposer introduced the Review to the Workgroup. They added that they met with Ofgem in December 2025 to discuss the Review and there was positive engagement, with Ofgem not foreseeing any conflicts with their own Energy Code Reform (ECR) timeline.

The Proposer took the Workgroup through what will be covered under the Review and the subject of cross-references was discussed, with points regarding the importance of reviewing and identifying cross references noted.

NESO noted work being undertaken by the UNC under the Governance Workgroup and added that it would be worth keeping an eye on this to ensure that RG008 work aligns with the ongoing UNC governance work.

The Proposer suggested a spreadsheet would be useful for capturing all of the changes passed through to the IGT UNC Review falling out of the UNC Governance Workgroup, as any change could have an impact on one of the cross-references which RG008 hopes to cover, continuing good practices from previous IGT UNC Reviews. The Code Administrator agreed that this would be a good approach. The Chair added that a risk register is also required. The Code Administrator added that this could be included within the same document as the Review progresses.

A Shipper noted a letter sent out by Energy UK the previous week on the Unified GNC collaboration piece with Ofgem and asked whether this review is linked to that wider piece of work. The Chair responded that this review is a separate piece of work being undertaken in both Codes under the current governance. The new Code Manager will be appointed prior to consolidation, so RG008 will look to ensure that all documents forwarded to the new Code Manager are as clean as possible.

The Proposer suggested that the Workgroup should focus first on the review approach, the makeup of the group, the outcomes of this to be then included within the Terms of Reference (ToR) which will be reviewed first.

The Proposer outlined their view for the initial approach of the review, beginning with a page turner to pull out all of the required housekeeping changes, followed by a secondary phase focused on cross-references to the UNC, and a final phase focused on IGT specific processes and provisions. The Chair asked whether in-person meetings were envisaged for the page turner. The Proposer responded that although page turners are more efficient in person, this may limit engagement, noting difficulties with in-person meetings these days. They suggested doing the page turner virtually, pulling up the UNC and IGT Codes side by side. They noted the importance of engagement with IGTs and Shippers as part of the review process.

A Shipper asked how long the Proposer foresees each of these three phases taking. The Proposer responded that the first two phases could be quite laborious. They noted that some work had been done on both Codes to help identify housekeeping and UNC referencing errors but added that it would be useful for a second person to undertake the same task to ensure the Codes have been thoroughly covered. They added that it was likely that page turners would be required for the first two phases, although potentially they could be covered in one.

The Code Administrator suggested that areas of Code could be issued to industry for review if the Review Group felt that certain areas of Code required further work or insight. The Proposer responded that this may be useful, although raised a concern over how much engagement this would get from parties not already attending the Review Group. A Shipper also raised concerns on the time required by parties to commit to the Review Group.

A Shipper asked about approach taken by the UNC in the Governance Workgroup. The Proposer responded that GDNs have been running through the legal text with Dentons, which has highlighted errors within the Code, such as proposed changes from Modifications have never been included as they have been superseded by different Modifications. They suggested that the first phase should focus on IGT UNC specific processes and provisions, noting that it will be the shortest section, and allow the Review Group to get into a flow ahead of the more laborious sections requiring page turners. The Review Group agreed.

There was discussion on the cadence of Review Group meetings and the Proposer suggested that a four-hour session monthly would be sufficient to get through the required work. They asked whether these meetings should be separated from the existing Workgroup meetings, noting that it may be better to use the Workgroup meetings when the agenda is lighter. It was suggested that a flexible approach should be included within the ToR, allowing the Code Administrator to either schedule a separate meeting or include within a scheduled Workgroup agenda, depending on other Modifications currently in progress. It was agreed to start the Review meetings as part of the Workgroup, to be reviewed periodically.

A Shipper asked whether the Review Group could meet and proceed without the presence of a certain party, such as a Shipper. The Proposer responded that the Review Group would have to proceed regardless and added that this should be recorded as a risk. As there is no decision making, the review sessions will not have quoracy.

NESO added that although they would not have the same knowledge of IGT processes as other parties, they were keen to be involved and help out with the Review Group meetings. They suggested it would be sensible to announce which sections would be covered ahead of each meeting, allowing for attendees to do some pre-reading.

The group discussed how to manage housekeeping issues arising from the review. There was agreement that creating a separate log or spreadsheet specifically for review-related housekeeping changes would be the cleanest approach. This would prevent duplication or inconsistencies between the main housekeeping log held in the Known Issues Register. The Proposer asked whether to circulate or hold the list of housekeeping issues they had discovered as part of their work on the review. The Code Administrator agreed to draft this log and bring it to the February Workgroup meeting.

The Review Group went through the proposed Review Group ToR and made amendments based on the discussions and agreements made previously in this meeting. The Code Administrator was asked about the proposed attendees for the Review Group. The Proposer suggested that the group should comprise of usual Workgroup attendees, plus any others who wish to attend. There was discussion on the objectives and topics of discussion for the Review Group, and which sections would need to be agreed again as part of the first meeting at the February Workgroup.

The Review Group covered the scope of the Review as set out in the ToR, which includes the main IGT UNC Code, Ancillary, Guidance and Process documents. Consideration will also be given to potential changes required at the request of Ofgem for Code Reform. The Code Administrator and the Proposer clarified in the ToR that changes to existing and future governance is out of scope, unless deemed relevant as the review proceeds.

The Proposer asked about the inclusion of a priority matrix within the IGT UNC Modification templates, as per the ongoing Ofgem consultation, and whether this would need to be called out specifically as part of this review. The Code Administrator responded that if it needs to be picked up, it will be, but the required changes to the Modification templates could be taken to Panel for approval separately from the review. They added that the templates will always have to hit the minimum standard for Codes, in which the priority matrix is likely to be included in due course. There was a discussion on the potential standardisation of all templates between the UNC and IGT UNC but it was agreed that this would be kept separate from both the prioritisation work being undertaken by Ofgem, and any minimum standards work to be done by the Code Administrators Code of Practice (CaCoP) Forum.

The Review Group discussed the outputs of the review. It was noted that one of the final outputs is always a Review Report to Panel containing assessment and recommendations from the group including draft Modification(s) if required/appropriate. The Code Administrator suggested monthly updates be provided to IGT UNC Panel as part of the Workgroup Summary Report with the ability to raise draft Modifications where needed. It was also suggested that RG008 could be kept open after the final review report to deal with any lingering issues that crop up afterwards. The Review Group agreed to these outputs.

The Review Group agreed for the Code Administrator to finalise the draft ToR ahead of them being published for paper day of the January IGT UNC Panel meeting should the Panel wish to review, with the aim to commence the Review Group at the February Workgroup meeting.

March 2026

The Proposer provided the Review Group with an overview of the intent of RG008, explaining that they seek to take a proactive, collaborative approach to tidying up the IGT UNC, so documentation handed to a future Code Manager of the Gas Network Code (GNC) is “consolidation-ready”.

The Code Administrator proposed a methodology to support of the work of the Review Group and presented a spreadsheet template intended to assist in capturing any identified changes to the IGT UNC or the UNC as the Review progresses.

They added reminded the Review Group that a two-phase approach had been proposed at the January Workgroup meeting:

- **Phase One:** High-level identification of IGT UNC-specific provisions and differences (nuances) to the UNC; and
- **Phase Two:** Identify and address housekeeping changes, cross-referencing errors, and legal text alignment.

In line with Phase One, and the discussion at the last Review Group meeting, it was proposed that the Review Group agree an area of the IGT UNC to focus on at that the next meeting. After some discussion, it was agreed that at the March 2026 meeting, the Review Group would complete a collaborative review of Part CI (Supply Point) with the aim of identifying IGT-specific provisions (or nuances). The Review Group agreed that Part CI was the preferred starting point as:

- An initial review had already been carried out by the Proposer.
- It was an area of the Code that contained differences that were already known to exist.
- It was a familiar and widely used area of the Code that would allow the Review Group to validate its approach before moving into more complex areas.

The Review Group also agreed that:

- All members would review Part CI in advance of the meeting so that any nuances could be highlighted in the meeting.
- The Code Administrator would maintain the RG008 Tracker Spreadsheet to log findings and facilitate the ongoing work of the Review Group.
- The Code Administrator would update the tracker after each Review Group meeting and publish it ahead of each meeting.
- Further meetings of the Review Group would focus on additional Parts of the IGT UNC and the explicit order of the Parts in scope of examination would be identified during the next meetings.

April 2026

The Proposer reminded the Review Group of the intent of the RG008 and 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 Review Group that identifying these nuances will go towards completing the work under Phase One.

The Proposer made reference to Individual Network Codes (INCs), noting a question in the previous meeting asking whether these were within the scope of RG008. They confirmed that they 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 Review Group completed a collaborative review of IGT UNC Part CI (Supply Points). Xoserve advised that they had identified some required housekeeping changes in Part CI. It was suggested that these could be sent to the Code Administrator to be included with the RG008 tracker and noted that housekeeping changes would be discussed in detail as part of Phase Two of RG008.

The Chair asked how RG008 will pick up changes to the UNC which could affect cross-Code references in the IGT UNC. The Code Administrator 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. They suggested that the Review Group be used to raise and progress any Modifications to implement 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.

The Proposer 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. The Code Administrator advised that there is no set time period for a Review Group and that RG008 could stay open until Code Consolidation is complete.

The Review Group identified the following IGT UNC nuances within Part CI:

Part CI – Supply Points	
Clause	Review Group Discussions
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.
1.5(d)	States that all SMPs are Central Switching Service (CSS) Supply Meter Points. This is currently a nuance but IGT176, which is pending implementation, will introduce non-CSS SMPs into the IGT UNC and therefore this will no longer be a nuance.
2.8	- Pipeline Operators will use reasonable endeavours to visit a premises within 15 Supply Point Systems Business Days. - Need to consider what the timeframe is for this under the UNC. - There is a slight difference in the definition of Business Days in the UNC and IGT UNC, which is covered in Paragraph 5 of Part CI. Noted that 5.3(b) 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.
3,1	- States that paragraph 2.1.4 of UNC Section G shall not apply. - This UNC 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. Need to consider why the IGT UNC has not included this clause. - Noted that this could have been as a result of re-numbering in Section G, causing this reference to be outdated. - Noted that there is some overlap with the legal text for IGT176, which should also be checked to see if that reference has been provisionally removed.
3.2	Noted that 3.2 (c) defines Class 1 Read Provider, which is not defined in the UNC
3.3	Noted that Local Distribution Zone (LDZ) LDZ Connected System Exit Point (CSEP) Ancillary Agreement is an IGT nuance. 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.

Part CI – Supply Points

6.2 & 6.4	With regards to Annual Quantity (AQ), it was noted that it includes the RPC Entry AQ, which is not included within the UNC. It was questioned how the starting AQ of a new premise is determined in the UNC. The Review Group agreed this should be checked as it could not be confirmed in the meeting. It was suggested that having different approaches could lead to two active methods in use under the GNC. It was advised that GDNs using Network Exit Agreement (NExA) tables has been floated previously and could be considered again under Code Consolidation.
8.2	Noted that the clause allows for the provisions of Section G5.1 of the UNC to apply. Noted that Section G5 is focused on CSS Supply Points and Supply Point Registration and it was questioned why the IGT UNC only refers to G5.1 here. It was suggested that the IGT UNC may cross-reference other areas of Section G5 elsewhere. It was suggested that the whole of Section G5 should apply here and that it would be useful to check any other instances where the IGT UNC references Section G5.
9 & 10	- Noted that these clauses specifically reference “Developer”. It was suggested that these are likely unique to the IGT UNC and should be checked. It was also noted that 9.2 and 10.2 reference the New Connections Ancillary Document and Project Summary Report. It was 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. - Noted that 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. It was also called out that Project Summary Notification used.
11	Noted that Terminated Supply Meter Points is defined in the IGT UNC, but not the UNC.
22.2	Noted that noted in 22.2 the IGT UNC references Paragraph 10.2.3(a) in the UNC but added that this does not exist. It was added that they believe the correct reference is Paragraph 10.3.2(a).

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

May 2026

The Proposer reminded the Review Group of the intent of the Review, explaining that RG008 proposes a productive, collaborative tidy-up of the IGT UNC, so documentation handed to a future Code Manager of the GNC is “consolidation-ready”.

The Proposer suggested that the Review Group review the RG008 tracker to consider nuances and changes that have been identified so far. The Chair advised the Review Group that the Code Administrator will publish the RG008 tracker every month so members can review it ahead of the meeting.

The Joint Office Representative advised that they had taken a question away from the March Review Group, in which members stepped through Part CI and were seeking information on what GDNs do in terms of determining an AQ for new domestic sites, instead of the NExA tables. They advised that where the Shipper has not provided an AQ, the GDNs use a table that sits outside of the UNC to determine this. This table is reviewed and updated annually, like the NExA tables for IGTs. They suggested this information should be captured in the tracker, potentially to review in the future if these

processes are merged as part of Code Consolidation. The Proposer and Code Administrator agreed it was useful to record this as a “nuance” in the tracker, even if decisions on alignment sit outside the immediate scope of the Review Group, as it provides valuable context for future consolidation work.

The Chair highlighted that the UNC itself simply requires the AQ to be notified by the Shipper to the CDSP, with no default defined in-Code, and that the GDN default table is only used in the absence of a shipper-provided AQ. In contrast, the IGT process relies on the NExA tables as the standard input rather than a fallback. An IGT member indicated that IGTs would be reluctant to move away from NExA due to its wider use across multiple processes and suggested that any harmonisation might more logically involve GDNs moving towards the IGT approach. There was general agreement that a standardised process across Networks would be desirable. The Chair also noted that Shipper views are likely to be important on this topic and should be sought at a later stage, as no Shippers were present in the discussion.

The Code Administrator took the Review Group through the RG008 tracker, explaining its use, how its updated and the content of each tab.

The Review Group completed a collaborative review of IGT UNC Parts CII and CIII, with Members having had an action to review this Part ahead of the meeting to identify IGT and IGT UNC-specific provisions.

The Review Group identified the following IGT UNC nuances within Parts CII and CIII:

Part CII – DM Capacity and Offtake Rate	
Clause	Review Group Discussions
1.1	A member noted that this clause disapplies certain requirements in the IGT UNC relating to seasonal large supply points, particularly in the context of DM and seasonal LDZ capacity. The reference relates to paragraph 7.5C of Annex B3 of the UNC, which appears to deal specifically with seasonal large supply points. Their understanding is that it is a GDN-specific concept. A Member suggested that it is important to note the specific disapplication, the Chair agreed.
1.1	- A member highlighted a clause in Para - graph 1 relating to paragraph 4.2 of Annex B3 of the UNC, which they believe is in incorrect quotation marks, as the paragraph looks to be a statement within the Code rather than replacement text. The Chair and TL responded that they would look into this further.
2	Members identified shared Supply Meter Points and applicable commodity rates being referenced in Paragraph 2, which do not apply in the IGT UNC.
3.1	A member noted in Paragraph 3, that there is a disapplication of a section relating to non-CSS Supply Meter Points (Paragraph 4.7 of Annex B-3). TL responded that this will be important to check against the legal drafting for IGT176, as this Modification will introduce non-CSS supply meter points into the IGT UNC.
4.1	- A member highlighted a potential housekeeping amendment in Paragraph 4, noting that there is a reference to Paragraph 5(c) of Annex B3 of the UNC which does not exist, and suggested that it means to refer to Paragraph 5.1(c). - A member noted the reference to Paragraph 5.4 of Section B Annex B-3 of the UNC shall not apply and that this relates to shared supply points. - A member noted the reference to the LCAA.

Part CII – DM Capacity and Offtake Rate

5	- A number of references to LCAA. - A member highlighted a potential housekeeping amendment in Paragraph 5, noting an incorrect reference in 5.1(b)(i), which is currently showing as 5.1(b)(j).
5.1(b)(j)	A member highlighted a potential housekeeping amendment in Paragraph 5, noting an incorrect reference in 5.1(b)(i), which is currently showing as 5.1(b)(j).
5.2	A member queried in 5.2, whether the correct defined term should be “New Supply Meter Point” rather than “Proposed Supply Meter Point”. TL clarified that, under the definitions, a new Supply Point is any proposed Supply Point, and that this explicitly includes a New Supply Meter Point.
5.2(a)	A member noted in 5.2(a), Prevailing Supply Meter Point is capitalised, but is not a defined term in the UNC. TL confirmed that it is not a defined term in the IGT UNC either. AB noted that Prevailing is defined in the UNC. AB and TL agreed that it is likely that two defined terms, “Prevailing” and “Supply Meter Point”, have been pushed together. TL noted that the IGT UNC points to the UNC definition of Prevailing.
Defined Term	The Proposer noted the defined term Provisional Maximum Supply Point Capacity, and that there is a difference to the definition in the UNC. While the UNC definition refers to the LDZ CSEP Ancillary Agreement (LCAA), the IGT UNC definition refers to NExA.
5.4(b)	A member noted a reference to Annex B3, Paragraph 6.4 of the UNC in 5.4(b). They added that the referenced clause includes the word “Transporter” and asked if the IGT UNC needs to stipulate that Transporter means Large Transporter in this scenario, which has been done in other sections of the IGT UNC. BM noted a similar amendment to be made in 6.1.
5.5	A member queried in 5.5 whether firm DM Supply Point was a defined term. TL responded that they would check that, noting that firm Supply Point is a defined term.
5.5 - 5.10	A member noted that from 5.5 to 5.10, there are a lot of differences between the UNC and IGT UNC, in relation to Ratchet. TL added that they have been looking into this area of Code for Xoserve in relation to a new UNC Modification that has been raised. AB noted that the only IGT UNC nuance in this section is 5.10, as it has been done in IGT UNC invoicing style. TL noted that this area of Code may need checking as 5.5 – 5.10 differs in its wording compared to the UNC.

Part CIII – Interruptible Supply Points

Clause	Review Group Discussions
1 Defined Term	A member asked about Interruptible Supply Points, a defined term mentioned in Part CIII Clause 1. The Chair advised that they were historically used as a mechanism to support network security at capacity pinch points. Under the scheme, organisations could offer to curtail their gas usage, typically through an auction like process where they set a price at which they were willing to give up gas supply. GDNs could then choose to interrupt those supplies if needed, particularly during capacity constraints. They added that interruptible supply was once common at known capacity pinch points but is now rarely used, primarily because networks have reinforced capacity in those areas. In relation to IGTs, these networks typically have newer infrastructure with capacity well in

Part CIII – Interruptible Supply Points

	excess of demand, meaning the same constraints are unlikely to arise. A member noted that, regardless of current usage, interruptible supply definitions and related provisions still exist in the UNC and therefore it would be sensible to retain the existing carve out. The Chair agreed. The Proposer noted that this had been a point of debate within UNC discussions and suggested that its long term value would likely need to be considered during future code consolidation, rather than resolved immediately. • References to LCAA.
1.3(b)	• Noted that 1.3 (b) refers to Part CII and its application of DM Capacity. This in turn is the disapplication of Seasonal Large Supply Points compliance with Seasonal LDZ Capacity.
2.1	• A member raised a query under 2.1 regarding why a registered user on an IGT network would be expected to provide certain details to the Large Transporter. The Chair explained that, for large sites, there is often a more complex, behind the scenes relationship between parties. They noted that arrangements such as tripartite or local agreements can exist between the registered user, the IGT, and the Large Transporter. While the site may sit on an IGT network, its operation can have impacts on the connected GDN, meaning the Large Transporter may need visibility of certain information.
2.2	• A member noted the definitions of Transcode Nominated Interruption (TNI) and Network Sensitive Load (NSL) in 2.2 but added that these are no longer defined terms in the UNC, and they could only find reference to them in the transition document. The Chair suggested that it would be good to gain more knowledge of the interruptible supply point scheme ahead of the next Workgroup meeting. BM responded that they would be happy to take an informal action to reach out to a network for more information.
3.1(e)	• References to LCAA. • The Proposer noted 3.1(e), noting that it appears to exclude liability for a range of factors relating to Interruptible Supply Points. They were unsure whether this provision remains appropriate or needs updating, particularly given the ongoing uncertainty and earlier discussion around the current relevance and use of Interruptible Supply Points.

The Joint Office offered to reach out to Code Administrator and the Proposer around further coordination to ensure that any work undertaken as part of RG008 is not left outdated by updates to the UNC. The Code Administrator and the Proposer both agreed that this would be useful. The Code Administrator responded that if the Joint Office lets them know of anything of value to be discussed in UNC Workgroups, they would be happy to attend those. The Joint Office agreed to the Code Administrator and the Proposer updated.

The Review Group agreed to review Parts CIV and CV of the IGT UNC in the April Workstream meeting as part of the next step in the work for RG008.

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The Review Group reviewed the RG008 spreadsheet. They considered introducing a new tab to track consequential actions, such as Modifications and agreed next steps for particular nuances. There was a wider discussion a result and agreement that Review Group members should identify and document issues and gaps but also consider when to raise formal Modifications. The Proposer suggested that work be grouped together for any Modification to limited the number that need to be raised. They used the example of housekeeping changes and that are large number could be put into one Modification to

minimise administrative burden. A staged approach was suggested by one member and felt that this might limited the need to avoid rapidly opening Code Sections. The Proposer agreed.

OC suggested that a structured and staged approach is needed to avoid repeatedly opening and closing code sections, ensuring each area is reviewed comprehensively before progressing. AB agreed and the Code Administrator suggested an offline review of actions and changes that could be compiled into future Modifications. These could then be run past the Review Group at a future meeting. The Chair emphasised the need to balance consolidation with transparency, ensuring external parties can still follow and understand the changes.

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Clause	Review Group Discussions
All	There are expected differences in referencing standard vs special Licence Conditions, reflecting Code-specific contexts.
1	The IGT UNC references Standard Condition 9(5) of the Licence whereas the equivalent section of the UNC does not
2	- Contains a list of definitions, with several differences identified from the UNC. For example, the IGT UNC includes a definition for Affected Person, whilst the UNC defines Affected Party. Several items such as Alternate and Alternative Proposal are not defined in the UNC, although some of these are referenced in the UNC Modification Rules. The UNC also defines some terms in its equivalent section which are omitted from the IGT UNC, such as the Independent System Operator and Planner (ISOP). - IGT UNC-specific documents are referenced, like the Best Practice Guidelines and Chairperson's Guidelines. A member clarified that Chairperson's Guidelines is referenced once in the UNC, 12.9.3(C), but is not a defined term. Another member noted that the UNC has a UNC Panel Chair Appointment Document. It was also noted that the closest equivalent to the Best Practice Guidelines is a Modification Proposal Guidelines document. - The Chair noted that a definition of Consumers' Representative includes the National Consumer Council, which is now defunct, so this definition will need to be reviewed. - The Chair raised a concern regarding the definition of Code of Practice, noting that it appears to be tied specifically to the Code Administrator's Code of Practice (CaCoP) and could unintentionally restrict the term's use elsewhere in the IGT UNC. The Code Administrator clarified that the definition is explicitly limited to Part L only, meaning it does not apply more broadly across the IGT UNC. - The Code Administrator advised that Fast Track Self-Governance Modification Report is not a defined term in the UNC, though there is a reference in the UNC to a fast-track Special Licence Condition, in A11 Paragraph 24A. - The definition of IGT Shipper Standing Work Group was questioned, suggesting that this should have been updated previously to IGT UNC Workstream. The Code Administrator noted a separate defined term of Work Group, which includes the IGT Shipper Standing Work Group. They highlighted the need to move towards a single defined term, with a clearer definition better reflecting current IGT UNC practices. - The definition of Panel Chairperson was referenced, the UNC includes explicit provisions for appointing the Panel Chair, including that the individual requires approval from Ofgem,

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	whereas this is not the case in the IGT UNC. The Chair and Code Administrator noted the difference in voting arrangements. In the UNC, the Chair is generally a non-voting member but can exercise a casting vote in the event of no majority, whereas in the IGT UNC, the Chair is explicitly a non-voting member with no casting vote provision. The Review Proposal definition was noted to reference 18.1.1, which is not an existing UNC clause. They suggested that the correct reference should be to 22.1.1.
3	Clause three has some equivalent provisions to what is in the UNC, but the UNC does not define Critical Friend. 3.1(e) and (f) were also referenced and I was noted that the UNC does not refer to assisting on Derogation Applications.
4 & 5	While the IGT UNC and UNC Panel structure is broadly similar there are notable differences in representation, seat numbers and appointment. In the UNC there is also a fixed appointment cycle, this is not the case in the IGT UNC.
6 & 7	There are equivalent provisions in the UNC on Meeting management, particularly in the notice period for meetings and paper dates. However, there are some differences. For example, the IGT UNC is flexible when reconvening non-quorate panel meetings while the UNC is more strict on when these can be rescheduled.
8	With regards to minutes and recordings both Codes have similar expectations in practice but while the UNC requires meeting minutes are published 5 WDs after a meeting, the IGT UNC requires 10 WDs. However, the IGT UNC does publish in 5 WDs. There is also currently no provision under either Code for the use of AI for administrative purposes. However, both Codes use AI to aid in the production of meeting minutes.
9	Incorrect reference highlighted, pointing to 28.7 when it should be 28.6.
10	- There are several structure inconsistencies and different definitions. Also, there are differences regarding the CCSG and the ability for them to raise change in the IGT UNC vs the UNC. - References to European Modification Proposals is also defined in IGT UNC and not the UNC.
10 - 12	For Content of Modification Proposals, Fast Track and Self-governance, the equivalent UNC sections have more detailed and extensive provisions, particularly for Self-Governance. The wording/structure differs enough that a targeted comparison exercise is needed to understand practical impacts.
13	Both Codes include similar high-level provisions on Significant Code Reviews (SCRs), but UNC makes more frequent cross-references to these within other sections.
14	- Circulation requirements for Modifications are largely consistent although UNC includes additional provisions (e.g. ISOP-related content) and is structured differently. - On Panel handling of Modifications, UNC contains more explicit wording on discussion and determinations, whereas IGT UNC appears to capture similar intent but across different sections.

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15	A key difference is in Alternative Modification Proposals. Under IGT UNC, alternatives can be raised and considered directly by the Workgroup, potentially without needing explicit Panel involvement, subject to notice periods. UNC also supports alternatives, but the terminology is less formally defined, and provisions are structured differently.
16	Further differences were identified in withdrawal and variation of Modifications. IGT UNC includes a formal definition of “variation request”, whereas UNC references it without defining it. IGT UNC also allows for withdrawn Modifications to be adopted by another party and continue, although this is not commonly observed in practice and there is no clear UNC equivalent.
17	On Urgent Modifications, both Codes are broadly aligned in timelines, but UNC includes additional detail and references (e.g. ISOP, CDSP). The Chair noted that, in practice, the formal urgent process can be supplemented by informal/preparatory discussions with Ofgem to ensure efficiency. The Chair also clarified that IGT UNC does not include ISOP provisions by design, following earlier guidance that this was not required, as ISOP relates more to network-level (UNC) rather than retail-level (IGT UNC) decisions.
18	For Panel discussions, UNC Panel will need to consider other aspects that are not relevant to the IGT UNC, such as National Transmission System (NTS) Charging Methodology. The wording is thus very different and will require further review.
19	- There are minor differences on Workgroup assessment/development, mainly on the number and makeup of members in attendance. Both Workstream and Workgroup meetings are terms within IGT UNC, which adds confusion. It was agreed that there needs to be a move to one clear name and definition for all Workgroup meetings. - Some terms in Clause 19 are not replicated in the UNC, such as insufficient business and subgroup.
21	In terms of legal text drafting, there are differences between the Codes. The IGT UNC places responsibility for legal text drafting on IGTs, but this is typically discharged in practice via contractual arrangements with the Code Administrator. UNC has additional supporting material, such as a legal text guidance document, which IGT UNC does not have.
22	The Review process is largely similar for both Codes, although in the UNC, these are called Requests instead.
23 - 25	- The core consultation framework is broadly aligned. However, several key differences were identified. The UNC includes additional detailed provisions involving CDSP and ISOP, particularly around responsibilities for preparing and submitting consultation materials, which are not present in IGT UNC. UNC also contains more extensive procedural detail overall, including how consultation inputs are managed. The IGT UNC includes references to self-governance classification, which were not evident in the equivalent UNC section (though may exist elsewhere). - The processes for Draft and Final Modification Reports (D/FMRs) are largely

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	aligned, excluding common differences in stakeholders between the Codes. The main differences occur in the later stages of the FMR, where UNC includes additional implementation and decision-making detail and more extensive content requirements (e.g. references to licence conditions, charging methodologies, and backstop timelines). IGT UNC is comparatively simpler and less prescriptive in these areas.
26	There is a clear section on Authority send-back provisions in the IGT UNC, with no equivalent section in the UNC, instead referencing the concept more loosely via licence conditions.
27 - 31	- On Modification implementation, IGT UNC includes more detailed and prescriptive provisions, particularly around implementation dates and sequencing. UNC appears less prescriptive and more flexible, with fewer explicit rules and there was no clear like-for-like UNC equivalent identified for the IGT UNC implementation section. - On pre-release and publication, IGT UNC includes a provision allowing up to 30 days post-implementation to publish updated Code, likely as a backstop in case of delays. In practice, publication typically occurs on the implementation date, and no equivalent UNC provision was identified. This requirement may reflect a legacy safeguard and is not current practice.
32	IGT UNC contains a dedicated section for SCR Modifications, whereas UNC does not have a single equivalent section, instead referencing SCRs in multiple areas.
33	UNC does contain a cross-code change section, but it is structured very differently to IGT UNC. UNC uses different terminology and defined terms (e.g. “principal energy code”, “lead code”, “relevant EC body”), whereas IGT UNC uses its own terminology. IGT UNC appears to include more explicit provisions around CCSG involvement, including roles in raising or progressing Modifications, which UNC does not clearly replicate. The Chair highlighted that IGT UNC CCSG provisions were introduced via SCR, meaning any differences are likely intentional and driven by policy decisions, rather than drafting anomalies.

The Ofgem representative commended the work being taken on by the Review Group. They advise that identifying and documenting the differences between the two Codes, particularly with regards to Modification and general governance, is highly valuable from Ofgem’s perspective. They highlighted that, while it may not be worthwhile making immediate changes where differences will ultimately be encapsulated through Code consolidation, understanding and evidencing why those differences exist is critical and strongly beneficial.

The Chair asked about future work to be potentially undertaken by the Review Group on Part L. Ofgem advised that they would confirm with Ofgem’s Code Consolidation team before committing and would provide an update shortly. The Proposer asked about the Code Consolidation Workgroups being run by Ofgem. Ofgem responded that invites for the Workgroups had not yet been issued but were expected soon.

The Proposer suggested that the Review Group progress the review by moving on to Part O (Derogations), confirming he would finalise initial work and share it with the Code

Administrator for further annotation. They noted this aligns with upcoming Ofgem work on derogation processes and suggested focusing on areas relevant to that programme. They also acknowledged limited participation due to availability and his own upcoming absence, and suggested the group retain flexibility to revisit other sections if progress slows.

The Code Administrator proposed producing an interim report compiling all agreed outputs to date for circulation on paper day, both to maintain a clear record of progress and to invite feedback from the Panel on structure and content, with a view to providing a formal interim update in July. The Review Group agreed.

5 Modifications

Insert text here

[Insert text here]

6 [Insert text here]

Insert text here

[Insert text here]

7 Recommendations

The Review Group invites the Panel to:

- REVIEW the report and provide any comments or questions.