

IGT UNC Modification Panel Meeting

Draft Minutes

Friday 25th September 2026

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Talan	Code Administrator	Chair
Aleksis Butler	AB	BUUK	Panel Alternate: Pipeline Operators	Alternate for Jenny Rawlinson, BUUK
Cher Harris	CH	Indigo Pipelines	Panel Member: Pipeline Operators	
Oorlagh Chapman	OC	Centrica	Panel Member: Pipeline Users	
Richard Welsby	RW	Last Mile Gas	Panel Member: Pipeline Operators	
Stacey Harris	SH	Joint Office of Gas Transporters	Observer	
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 Jenny Rawlinson (JR) (BUUK) and Nadir Hafeez (NH) (Ofgem). AB was acting as the alternate for JR.

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). TL added Item 12 – CACoP Survey.

3. Approval of the previous minutes (26-08 and 26-08 Reconvened)

The CA invited comments on the 28th August 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 true and accurate accounts of the meetings.

4. Outstanding Actions

The Panel were informed that there was one outstanding action:

26/08 – 01: Code Administrator to issue industry communications encouraging IGT UNC Party engagement with the proposed 2026/27 NEXA AQ Review Tables ahead of the September

Workgroup meeting. It was confirmed that in the industry communications issued for the publication of the draft and final agendas for the September Workstream meeting, the Code Administrator encouraged Parties to attend for a discussion on the proposed 2026/27 Network Exit Agreement (NExA) Annual Quantity (AQ) Review Tables.

Action closed.

Modification Business

5. IGT184 - RG008 Housekeeping: Parts CI-CV, L, O, and IGT UNC Derogations Guidance

TL took the Panel through the Final Modification Report (FMR) for IGT184. They advised that this is a Fast Track Self-Governance Modification Proposal. AB explained that IGT184 only contains non-material changes identified as part of [RG008 – IGT UNC Code Review in preparation for Code Manager and Code Consolidation](#), including correcting cross-references, addressing drafting errors, and fixing minor inconsistencies. The proposed amendments had already been reviewed in detail by the RG008 Review Group and did not introduce any new policy or substantive amendments.

Solution

TL emphasised that the Code sections within scope of the Modification had undergone extensive paragraph-by-paragraph review through RG008, with all proposed legal text changes having been scrutinised and agreed as housekeeping items before being included in the Modification. The Panel were reminded that, due to the Modification being considered Fast Track, this meeting was the sole opportunity to raise concerns before a decision was made. TL confirmed that the Modification had been raised and issued to industry to fulfil the 15 Working Day objection window, and no objections were received. The Panel had no comments on the solution.

Impacts

TL advised that the Proposer and Review Group had indicated no material impacts for this Modification. The Panel agreed that there were no impacts.

TL noted that for the Relevant Objectives, the Proposer had identified a positive impact on Objective (F) – *Efficiency in the implementation and administration of the Code*. The Panel unanimously agreed with the Proposer's views on the Relevant Objectives for IGT184.

Implementation

TL advised that the Proposer raised the Modification suggesting an implementation dated of one Working Day following the closure of the 15-day Working Day Appeal Window. They noted that this date would be Monday 19th October, subject to Panel approval in this meeting. TL added that the next scheduled standard Release for the IGT UNC is on 6th November, and asked Panel members if they

would prefer for IGT184 to be implemented on this date instead. AB asked what else will be implemented in the standard November Release. TL responded that there is nothing targeted for that release so including IGT184 in it would cause no issues. CH supported using the standard November release for implementation, adding that they would prefer to stick with using the standard IGT UNC releases for Modification implementation unless an extraordinary release is necessary. RW agreed with this view.

The Panel unanimously agreed to proceed with a revised implementation date of 6th November 2026 for IGT184.

Prioritisation

TL asked if the Panel agreed that the legal text delivers the intent of the Modification and is fit for purpose. The Panel unanimously agreed that this is the case.

Governance

TL advised that the Proposer had determined that IGT184 should be subject to Fast Track Self-Governance, due to the lack of material impacts. The Panel unanimously agreed with this governance route.

Determinations:

The Panel considered the IGT184 Final Modification Report (FMR) and unanimously agreed:

- that IGT184 does not have an impact on any Significant Code Reviews (SCRs) or other industry projects;
- that IGT184 is a Fast Track Self-Governance Modification Proposal;
- that Impacts and costs set out in the report are accurate and appropriate;
- that IGT184 will have a positive impact on Objective (F);
- with the revised implementation approach; and
- that the IGT184 legal text delivers the intent of the Modification.

The Panel unanimously agreed that:

- IGT184 should be implemented.

AB raised a point about how RG008 outputs are being communicated to Ofgem. They noted that recent conversations with Ofgem suggested a desire for more visible and accessible outputs from RG008, particularly through interim reporting and summary documents that clearly demonstrate progress and achievements.

TL explained that IGT184 would be reflected in future RG008 reporting and that the review tracker would be updated to distinguish completed items from those still under review. They confirmed that

they were not planning an interim report at the next meeting because the review of Part K had not yet concluded. Instead, they intended to issue a more comprehensive update once Part K had been completed, incorporating both the latest RG008 outcomes and details of the recently approved Modification. They also noted that Ofgem had been advised that interim updates could be provided at any time if specifically requested.

The Chair suggested that Ofgem may be more interested in substantive policy and process findings, and that it would be helpful for Ofgem to clarify exactly what information and outcomes it wished to receive. TL observed that, if Ofgem was looking for specific industry recommendations on future Code arrangements rather than lists of discussion points, that would require a different and potentially more resource-intensive approach from the Review Group.

Panel members also discussed Ofgem's indication that a dedicated representative may join for the RG008. It was agreed that their attendance would provide an opportunity to better understand their expectations and desired outputs, enabling the Review Group to tailor its reporting and work programme more effectively. AB noted that Ofgem had expressed support for the work being undertaken through RG008 and welcomed the detailed consideration of Code nuances and legacy issues. TL advised that they would raise the matter with Ofgem through their regularly scheduled meetings with its representative, seeking greater clarity on reporting expectations and encouraging attendance at future RG008 meetings.

Panel Business

6. [NExA AQ Review Tables](#)

TL presented the proposed revised 2027/28 NExA AQ Review Tables to the Panel. They advised that an amended set of the proposed NEXA AQ Review Tables had been submitted following the discovery of an error in an IGT's data submission. The issue related to the submission of incorrect source data rather than the AQ calculation methodology itself. The amended values were reviewed by the Workstream at their September meeting and were recommended for approval without comment.

The Panel unanimously agreed that they were happy to approve the proposed 2027/28 NExA AQ Review Tables, which will be implemented as part of the standard IGT UNC release in February 2027.

Updates from Workgroup

7. [Workgroup Summary Report](#)

HF presented the Workgroup Summary Report. TL noted that an update on [RG009 - Introduction of Qualification Requirements for new Shippers](#) had been included within this report. They added that the Panel had previously requested quarterly updates on RG009. They explained that an interim report had not been presented at this meeting because the Review Group had not yet progressed far

enough to produce a meaningful update. The initial meeting had primarily focused on introducing the review, while the subsequent meeting had been postponed. As a result, the most recent meeting was the first occasion on which participants had been able to undertake a detailed discussion of the review's substantive issues. During that meeting, the group considered responses received through the Information Request process and reviewed the resulting outputs. The volume of discussion generated meant that not all planned agenda items could be completed, with a number of points being taken away for further consideration ahead of the next meeting in October. TL also reminded the Panel that RG009 was progressing alongside a UNC Review and that the meetings were joint. They added that they were reticent to produce a report that didn't have a UNC Report to sit alongside it. The Panel had no further comments to add.

Authority Updates

8. Authority Update

TL advised that NH provided the Code Administrator with the following Authority update ahead of the Panel meeting:

SDS-2

"We published our [Second Preliminary Strategic Direction Statement](#) on 15th September on the Ofgem website.

This will become the first SDS that future Code Managers will be obliged to consider in delivery plans, upon publication of the conversion letter (or letters) later this year. This should now be the SDS used when undertaking the harmonised approach to Code Modification prioritisation.

This means that Code Administrators and Panels will be required to show consideration of SDS-2 in their prioritisation decisions.

REC EA23 Decision & REC code text consultation.

On 4th September we published our statutory consultation on proposed [modifications to the Retail Energy Code \(REC\) and affected energy licences](#).

The consultation forms part of the implementation of Energy Code Reform and seeks views on the code and licence changes required to implement the new governance framework established under the Energy Act 2023 and prepare the REC for designation. The proposed Modifications implement previously consulted-on policy decisions and are intended to align the REC and affected licences with the Code Manager licensing framework.

GA86/EA89 licence statutory consultation & Stat Con Notice

On 2 September Ofgem published the [energy code reform phase 1: code manager licence modifications](#). We are consulting on proposed modifications to certain standard conditions of the Code Manager licences for the Balancing and Settlement Code (BSC) and Retail Energy Code (REC), and the introduction of special conditions. The proposed changes include arrangements to address transitional issues relating to budgets, budget appeals, cost recovery and delivery plans, measures to support further development of the Code Manager performance framework, as well as special conditions to support the transfer of certain code governance responsibilities to the Code Managers.

Phase 1 Decision

On 1 September we published our decision on the [phase 1 consultation on transitional measures and code changes](#).

The decision sets out our intention to take forward proposals on the policy areas consulted on in that consultation, namely proposed changes to the BSC and REC, Code Manager licence terms, and bespoke and transitional licence arrangements for Code Managers of the BSC and REC.”

9. [Ofgem’s Expected Decision Dates \(EDD\)](#)

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

- There is an expected decision date of 30th September 2026 for [CSL01 – Exclusion of Standalone Networks from IGT UNC](#).

AOB

10. Code Consolidation Update

The Chair provided an update on Ofgem's gas Code consolidation work. They noted that three recent Ofgem workshops had considered future governance arrangements, including accession arrangements, credit arrangements and areas of common governance across the gas Codes.

AB who also attended reported that the discussions were generally positive, with Ofgem presenting comparisons between the UNC and IGT UNC, identifying key differences and outlining its initial thinking while remaining open to stakeholder feedback. OC added that they had also attended and noted that engagement improved across the workshop series, with later sessions providing greater opportunity for discussion and collaboration.

The Panel discussed ongoing uncertainty regarding the future governance model, particularly around day-one implementation arrangements, ownership structures, decision-making responsibilities and funding arrangements. The Chair highlighted that several significant issues, including future Code

funding and financial governance, remain unclear and will require further development as the consolidation programme progresses.

The Chair noted that industry engagement with Ofgem remains ongoing and agreed that further clarity will be required on governance, funding and implementation arrangements as the programme develops. OC also noted the forthcoming publication of Xoserve budget and business plan information and the importance of understanding how future industry costs may be recovered under the new framework.

11. Potential IGT UNC Modification – Enhanced Transparency and Itemisation of IGT Charges

OC advised that they had contacted the Code Administrator about a potential Modification intended to support future electronic billing requirements by improving the transparency and structure of invoicing data. OC explained that the proposal would seek to ensure bundled charges are itemised and supported by sufficient detail to facilitate automated validation and processing.

CH asked whether the scope of the Modification intends to cover both invoices and supporting backing data. OC confirmed this. CH asked for more detail on the proposed changes to IGT charges. OC responded that the intention is not to introduce detailed charging breakdowns but to ensure individual charge types can be identified where services are currently bundled together.

The Panel supported further exploration of the proposal through the Workgroup. CH highlighted previous work to standardise invoice backing data and the potential benefits of extending this approach more broadly. The Panel also noted the importance of considering any system impacts and aligning future arrangements with wider UK electronic invoicing requirements expected to be brought in by 2029.

The Panel agreed that the potential Modification should be brought to the Workgroup for further consideration. TL advised that an updated discussion paper will be circulated in advance of the meeting, incorporating feedback from the Panel and enabling other IGT UNC stakeholders to provide further input.

12. CaCoP Survey

TL advised that the Code Administration Code of Practice (CACoP) have issued their [2026 annual stakeholder survey](#), seeking feedback from Parties on how effectively Code Administrators are delivering CACoP Principles and Standards. Responses can be submitted to box.CACoP@neso.energy until the deadline of Friday 2nd October.

The next IGT UNC Panel meeting is scheduled for Friday 23rd October 2026.

Annex 1 – Actions Table

Reference	Action	Owner	Status
26/08 - 01	<i>Code Administrator to issue industry communications encouraging IGT UNC Party engagement with the proposed 2026/27 NExA AQ Review Tables ahead of the September Workgroup meeting.</i>	<i>Code Administrator</i>	<i>Closed</i>

DRAFT