IGT UNC 26-10 Modification Workstream Meeting

Draft Minutes

Thursday 8th October 2026 via teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Talan	Chair
Aleksis Butler	AB	BUUK	Proposer for RG008
Oorlagh Chapman	OC	Centrica	Present for items 1-5
Nadir Hafeez	NH	Ofgem	
Ben Mitchell	BMi	Xoserve	
Ben Mulcahy	BMu	Joint Office	
Cher Harris	CH	Indigo Pipelines	
Alice Pigott	AP	Ofgem	Present for item 5
Baldip Singh	BS	Ofgem	Present for items 6-12
Talia Lattimore	TL	Talan	Code Administrator
Paul Rocke	PR	Talan	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting. There were apologies received from Richard Welsby (Last Mile Gas).

2. Confirmation of Agenda

The Chair confirmed the items for discussion outlined in the Final Agenda and asked for any additional items of business to be raised. TL added Item 10 – Fast Track Modifications.

3. Approval of the Previous Minutes 26-09

TL noted that no comments on the minutes of the 26-09 meeting had been raised ahead of this meeting. The Workgroup had no comments to add to the minutes, which were consequently approved as a true and accurate record of the meeting.

4. Outstanding Actions

The Chair noted that there were two outstanding actions for consideration:

26/09 – 01: RG008 Members to review and provide comments on the Part M document ahead of the next Modification Workstream meeting on 8th October. Discussion on the Part M review document took place as part of ongoing work on RG008. Further detail on this is covered under Item 5. **Action closed.**

26/09 – 02: Ahead of the next Modification Workstream meeting on 8th October 2026, RG008 Members to consider Part K Clauses 24-46 and appendices K1 and K2 in support of the Phase

One identification and logging IGT-specific provisions. Part K, Clauses 24-46 were reviewed by Workstream members in this meeting as part of ongoing work on RG008. Further detail on this is covered under Item 5. **Action closed.**

MODIFICATIONS & REVIEW

5. RG008 – IGT UNC Code Review in preparation for Code Manager and Code Consolidation

As the Proposer for the Review Group, AB reminded the Workstream of the intent of the Review, explaining that RG008 proposes a proactive, collaborative tidy-up of the IGT UNC, so documentation handed to a future Code Manager of the Gas Network Code (GNC) is "consolidation-ready".

AB, BMu and TL presented findings from the ongoing review of defined terms within Part M. They confirmed that the work had started on a subset of 25 definitions where the IGT UNC references UNC definitions that either no longer exist or are no longer explicitly defined. BMu noted that significant historical investigation had been required to trace changes, including several instances where Modifications associated with Project Nexus altered or removed original UNC definitions. The following definitions were reviewed by Members:

- **Agency Charging Statement**

The Workstream noted that the definition historically existed within the UNC but was removed following Project Nexus-related changes. References within the IGT UNC may now be redundant. Further consideration is required regarding whether the term remains necessary within the Code.

- **Bottom Stop**

The Workstream noted that the defined term no longer exists in the UNC. References within the IGT UNC appear only within the definitions section. Removal of the term from the IGT UNC may be appropriate, subject to further verification.

- **Class 1 Requirement**

The Workstream noted that the UNC contains a definition for "Class 1 Meter Read Requirement" but not "Class 1 Requirement". Several potential solutions exist, including defining the term directly within the IGT UNC or referencing alternative UNC provisions. It was agreed that current UNC developments in this area should be monitored before determining a final approach.

- **Contract Management Committee**

The Workstream noted that the term exists within UNC provisions but is not separately defined. The relevant UNC provisions sit under the broader Data Services Contract (DSC) Committee framework. Options will be explored to consider whether the IGT UNC could cross reference provisions more transparently.

- **DM Output Nomination**

It was confirmed that the definition remains present within the UNC. No immediate action is required.

- **DM Supply Point**

The Workstream noted that the concept remains described within the UNC but is not a formally defined term. Existing IGT UNC references remain functional. The possibility of improving reference transparency will be explored.

- **DRN**

The Workstream confirmed that DRN refers to "Definitive Registration Notification", noting that the defined term referred to the acronym as opposed to the fully expanded description. A potential housekeeping amendment would be considered to clarify this definition within Part M.

- **Firm CSEP**

Discussion identified uncertainty regarding whether the concepts of Firm and Interruptible Connected System Exit Point (CSEPs) remain operationally relevant. The Workstream agreed this should be explored further through the Independent Gas Transporter Arrangement Document (IGTAD).

Action 26/10-01: Aleksis Butler to raise the following question at the IGTAD meeting on 21st October 2026: "Can the Large Transporters confirm whether the concept of Firm and Interruptible CSEPs still exists and, if so, how the associated arrangements operate?"

In carrying out its review of IGT UNC Part K, Clauses 24-46, the Workstream identified the following points of note:

- **Clause 24 (Terms of Permitted Disclosure)**
- **Clause 24.3**
    - The equivalent UNC provisions are separated into UNC Section 5.5 (Exceptions) and additional provisions elsewhere within the UNC.
    - Additional UNC exemptions exist relating to disclosure by and to the Central Data Service Provider (CDSP).
    - The IGT UNC includes an additional exemption covering disclosure by an upstream pipeline operator.
    - A drafting query was identified regarding subsection "(v)", where it appeared a hanging "or" may be a remnant from a previously removed provision. It was suggested this could be addressed through a future housekeeping change.
- **Clause 24.4**
    - The corresponding UNC provisions are separated into UNC Section 5.6 (Survival). This difference was noted for tracking purposes only.
- **Clause 24.5**
    - The corresponding UNC provisions are separated into UNC Section 5.6 (Transporter's Licence). This difference was noted for tracking purposes.
- **Clause 24.6 (Data Permissions Matrix)**

- There was a potentially material difference between the IGT UNC and UNC routes for amending the Data Permissions Matrix (DPM);
- There was a possible gap in the connection between IGT UNC governance and Data Services Contract (DSC) governance, with respect to whether the DPM could be amended via Modification or via a decision of the Contract Management Committee (CoMC)
- The Workstream agreed that the issue required further investigation rather than a simple drafting amendment; it was agreed that the relationship with the Part N DPM provisions and relevant historical modifications should also be considered; and that the matter should return to the Workstream for more detailed consideration, with additional priority because of its data protection and data permissions implications.

- **Clause 25 (Data Ownership)**
  - Different parties are referenced within the equivalent UNC provisions. UNC provisions include references to the Independent System Operator and Planner (ISOP). Members recalled that Ofgem had previously confirmed equivalent ISOP references were not required within the IGT UNC.
  - The IGT UNC refers to "computer systems" whereas the UNC refers specifically to UK Link. It was suggested that the broader IGT UNC wording may have been intended to future-proof the provision.
- **Clause 26 (Liability)**
- **Clause 26.3**
  - The definition of "Relevant Date" differs from the equivalent UNC provision.
  - It was recognised that further assessment would be required to determine whether the difference was intentional or simply historic.
- **Clause 26.4**
  - Liability caps differ between the IGT UNC and UNC. UNC values referenced were:
    - £1 million under one provision.
    - £10 million under another provision.
  - Members observed that liability provisions are already expected to be revisited during code consolidation activity.
- **Clause 27 (Collective Transporters Liability)**
  - The UNC contains collective transporter liability provisions which do not appear within the IGT UNC. Further assessment is required to determine whether those provisions are not relevant to IGT arrangements or whether an omission exists.
  - Formatting issues were also observed, which could be addressed through a future housekeeping change.
- **Clause 30 (Indemnities)**
  - As per Clause 26.4, liability levels differ from those contained within the UNC. Differences have been recorded for later consideration as part of wider code consolidation work.

- **Clause 31 (Meaning of Force Majeure)**
- **Clause 31.3**
    - Additional parties are referenced in equivalent UNC provisions. A question was raised as to whether IGT users of other IGT Pipelines (for example, nested CSEPs) should be included. It was suggested that some of this may already be addressed within Clause 31.4.
- **Clause 34 (Notices and communications)**
- **Clause 34.1**
    - The UNC contains additional drafting around the definition of "Notice"; the IGT UNC does not appear to replicate all equivalent requirements.
- **Clause 34.6**
    - UNC provisions deem communications received after 5pm to have been received on the next day, whereas the IGT UNC sets the threshold at midnight.
- **Clause 34.9**
    - The Workstream discussed provisions allowing communication by computer disc. Members noted such provisions are likely obsolete, and that modern information security arrangements would not generally permit receipt of information through discs or removable storage media.
- **Clause 35 (Communication by telephone)**
    - The IGT UNC defines "Code Communication". The UNC instead defines "Communication". This difference will be added to the list of defined term variations requiring future review.
- **Clause 35.1(a)**
    - The Workstream noted an observation had been made regarding the use of numeric formatting ("three" versus "3"). Members viewed this as a broader consistency issue rather than something requiring an isolated amendment.
- **Clause 36 (Communication by Other Means)**
    - There did not appear to be an equivalent UNC provision.
- **Clause 37 (Language)**
    - Query raised regarding whether the Clause should refer to Ancillary Documents as well as Framework Agreement.
- **Clause 38 (Governing Law)**
    - Query raised regarding whether the Clause should refer to Ancillary Documents as well as Framework Agreement.
- **Clause 39 (Jurisdiction)**
- **Clause 39.3**
    - The Workstream considered whether reference to "any party" should instead mirror UNC drafting referring to Gas Transporters or Pipeline Users Discussion concluded that the broader "party" wording may be intentional because arrangements can

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involve wider participant groups beyond pipeline users alone. Further review would be needed before recommending any change.

- **Clause 40 (Communication of incidents)**
- **Clause 40.1**
  - The Workstream noted the IGT UNC references incidents as affecting 50 supply points. The equivalent UNC threshold is 250 supply points.
- **Clause 41 (Rights of Third Parties)**
  - A reference to Clause 42.1 may need to be updated to Clause 41.1. Historic numbering issues may explain the discrepancy. These points were recorded for further investigation.
- **Clause 43 (Standards of Service)**
  - The Standards of Service arrangements appear unique to the IGT UNC. No direct equivalent UNC provisions were identified during the review.
- **Clause 44 (Temporary Measures)**
- **Clause 44.1**
  - The Workstream identified capitalisation inconsistencies; housekeeping corrections were recorded for future consideration.
- **Clause 44.3**
  - Apparently incorrect references such as "32.2.6" where "3.2.6" may have been intended.
- **Clause 44.4**
  - Change of System Communication for Invoice Documents Implementation clause appears unique to IGT UNC, with no equivalent UNC provision.
  - This clause constituted a transitional clause associated with IGT173. References to implementation dates existing solely to manage transition from pre-implementation to post-implementation arrangements. Members agreed these provisions are likely candidates for future cleanup once no longer required.
- **Appendix K-1 Operational Data**
  - No attendee could recall Appendix K1 ever being used in practice. The appendix supports proposals relating specifically to operational data items. Discussion explored who could qualify as a "third-party participant". Members noted that designation ultimately rests with the Authority. The Workstream concluded the provision remains valid but unusual.
- **Appendix K-2 IGT UNC Ancillary Documents**
  - Several ancillary documents currently published do not appear to align fully with Appendix K-2 listings. Document titles may have changed over time. Further validation of the appendix is required. A future housekeeping amendment is likely needed to ensure all listed documents are accurate and up to date.

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Action 26/10 – 02: Ahead of the next Modification Workstream meeting on 12th November 2026, RG008 Members to consider Parts N and P in support of the Phase One identification and logging IGT-specific provisions.

6. Potential IGT UNC Modification - Enhanced Transparency and Itemisation of IGT Charges

In the absence of OC (who had raised the item for discussion), TL provided an overview of the paper, which proposed a potential Modification or review to consider:

- Enhanced transparency of IGT charging arrangements.
- Impacts of future mandatory electronic invoicing requirements expected from April 2029.

The Workstream discussed forthcoming Government plans for mandatory electronic invoicing of VAT invoices expected from April 2029. Several members observed that compliance would likely involve significant system and process changes across the industry. TL noted that current IGT invoicing arrangements include the use of PDF-based invoices and queried whether these arrangements would remain compliant under future requirements.

The Workstream recognised that any future solution would likely need to encompass:

- invoice generation;
- backing data provided alongside invoices;
- system-to-system data exchanges;
- VAT compliance requirements;
- industry governance provisions; and
- consequential impacts on both IGTs and central service providers.

TL questioned whether the transparency proposals and the e-invoicing proposals should be treated as a single Modification or whether they represented separate issues requiring distinct approaches. She suggested that the transparency aspects could potentially proceed independently of the electronic invoicing work and could therefore be progressed on a different timescale. The Workstream generally agreed that the two areas should not automatically be treated as a single package.

CH noted that significant work would be required simply to define the scope of the issue, including clarifying:

- whether discussions concern invoices themselves;
- the supporting or backing data associated with invoices; or
- both invoices and backing data together.

CH advised that lessons from previous invoicing-related Modifications would likely need to be considered before determining an appropriate solution.

Several members considered whether the issue was sufficiently understood for a Modification to be raised at this stage. It was considered that a review process may be more appropriate initially, allowing stakeholders to identify:

- the precise requirements;
- affected systems and processes;
- governance implications;
- interactions with future code reform; and
- potential implementation approaches.

AB agreed, stating that both the transparency issue and the e-invoicing issue appeared sufficiently complex to justify review activity before any formal code change was developed. He considered that attempting to address all issues through a single Modification at this stage could create unnecessary complexity and confusion.

The Workstream discussed whether parallel activity might already be underway elsewhere in the industry. TL queried whether the CDSP was already assessing the future implications of mandatory electronic invoicing and whether such work could influence future code requirements. She noted that system requirements may ultimately determine what governance changes are necessary, rather than the other way around.

BMi advised that he was aware of broader activity within Xoserve relating to the forthcoming invoicing changes. He offered to investigate the implications specifically from an IGT perspective and provide further information to a future Workstream meeting.

Action 26/10 – 03: Ahead of a future meeting of the Workstream, BMi to provide a summary of work being undertaken within Xoserve regarding future changes to mandatory electronic invoice requirements.

The Workstream recognised that introducing interim solutions which subsequently require replacement could create unnecessary cost and complexity. Members therefore favoured understanding the future requirements first before determining whether code changes are necessary.

STANDING ITEMS

7. Cross Code Modification Implications Tracker

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

Watch List

- **0948 – Housekeeping: Correction to General Terms Section D.** TL explained that this Fast-Track Modification contained a cross-reference correction which would also impact IGT UNC Part N.
- **0944 – Proposal to remove obsolete clauses from TPD Section V 5.10 & Annex V-2, and V5.11 & Annex V-3 of the UNC.** TL advised that this Modification may require consequential updates to Annex references contained in IGT UNC Part N.

- **0940 – Updating the provision of Non-Daily Metered Sample Data** - the Modification seeks to update arrangements relating to the provision of non-daily metered (NDM) sample data. Because the IGT UNC contains direct references into the UNC area affected by the Modification, there is a need to assess whether any unintended consequential effects arise for IGT arrangements. Changes to UNC sampling arrangements could automatically extend to IGT arrangements through existing cross-references, so the Workstream may subsequently need to consider a consequential Modification or governance action.

IGT UNC Equivalent Modifications

- **0926 - Maintenance criteria for Emergency Contact data held in Central Systems.** The UNC Panel approved this Modification for implementation in August. The IGT UNC equivalent Modification IGT183 will go to the October 2026 IGT UNC Panel meeting for decision.
- **0922 - CDSP Obligations required for the introduction of the Gas Shipper Obligation.** Both this Modification and IGT180 are currently on hold whilst the Code Administrators wait for DESNZ to submit updated versions of both Modifications, which will look to implement the enduring solution, rather than focusing on a temporary solution.

8. IGT UNC Known Issues Register

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

9. IGT UNC Horizon Scanner

TL highlighted the recent publication of Ofgem's second preliminary Strategic Direction Statement (SDS2). SDS2 will be used when conducting future Modification prioritisation reviews. Live Modifications would be reviewed against SDS2 during the November Workstream cycle.

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The Chair asked the Workgroup to raise any other items for consideration.

10. Fast Track Modifications

TL noted that three Fast Track Modifications relating to IPL, GPL and QPL Individual Network Codes were currently within the objection period until 23rd October 2026. No objections had been received at the time of the meeting and would be considered at the October Modification Panel.

11. November 2026 Release

TL noted that pre-release documentation had been published on 7th October 2026, ahead of the release scheduled for 6th November 2026. This release will incorporate changes to implement the following Modification:

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

This Release also incorporates changes to the following Ancillary Document to deliver changes approved for IGT184:

- IGT UNC Derogations Guidance Document

12. Ofgem publishing moratorium

NH advised that Ofgem's annual publishing moratorium will run from 14th December 2026 to 4th January 2027 inclusive. Publishing activity would recommence on 5th January 2027.

The next Workgroup meeting is scheduled for Thursday 12th November 2026.

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Annex 1 – Actions Table

Reference	Action	Owner	Status
26/09 - 01	*RG008 Members to review and provide comments on the Part M document ahead of the next Modification Workstream meeting on 8th October.*	*All*	*Closed*
26/09 - 02	*Ahead of the next Modification Workstream meeting on 8th October 2026, RG008 Members to consider Part K Clauses 24-46 and appendices K1 and K2 in support of the Phase One identification and logging IGT-specific provisions.*	*All*	*Closed*
26/10 - 01	**Aleksis Butler to raise the following question at the IGTAD meeting on 21st October 2026: "Can the Large Transporters confirm whether the concept of Firm and Interruptible CSEPs still exists and, if so, how the associated arrangements operate?"**	**Aleksis Butler**	**Open**
26/10 – 02	**Ahead of the next Modification Workstream meeting on 12th November 2026, RG008 Members to consider Parts N and P in support of the Phase One identification and logging IGT-specific provisions.**	**All**	**Open**
26/10 - 03	**Ahead of a future meeting of the Workstream, BMi to provide a summary of work being undertaken within Xoserve regarding future changes to mandatory electronic invoice requirements.**	**Ben Mitchell**	**Open**