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 **27th November 2026**.
	**High Impact**: IGT UNC
	**Medium Impact**: IGTs, Shippers, Suppliers
	**Low Impact**: CDSP

IGT | UNC

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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 27th November 2026 for information.

Any questions?

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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.

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[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

Impact on Transporters	
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 be 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.
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 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.

Part CI – Supply Points	
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.
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 a 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

Part CII – DM Capacity and Offtake Rate	
	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 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

Part CIII – Interruptible Supply Points	
	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.

June 2026

The Review Group reviewed the RG008 spreadsheet. They considered introducing a new tab to track consequential actions, such as Modifications an 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.

Part L - Modification Rules	
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, thought 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 Review Group. 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, 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

Part L - Modification Rules	
	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 struck 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.
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

Part L - Modification Rules	
	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 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

Part L - Modification Rules	
	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.

August 2026

The Review Group considered the interim RG008 Report. The Code Administrator explained that the report had been produced to provide formal record of progress thus far. They advised that updated interim reports would be brought to Review Group and Panel on occasion to keep stakeholders such as the Panel, Ofgem and the Joint Office informed of developments. The report covered Review work completed up to Part L and was intended to provide a clear record of discussions, rationale and decisions, rather than relying solely on meeting minutes or clause comparison spreadsheets.

The Chair noted that no concerns had been raised by the Panel when the report was presented for information. They also advised that Ofgem had recently confirmed it was actively monitoring the RG008 review and had expressed a particular interest in the group's work, making the interim reporting approach useful for regulatory engagement. Some Review Group members supported the report's format, commenting that the report structure provides a clearer and more user-friendly summary of discussions and decisions than reviewing historic minutes.

The Review Group reviewed the RG008 spreadsheet and considered Part O provisions. The Review Group identified the following IGT UNC Nuances and Housekeeping Changes within Part O:

Part O - Derogations	
Clause	**Review Group Discussions**
1.2	• The definitions Derogation Eligibility Criteria and Derogation Guidance Documents are IGT UNC specific definitions
2.1.3(a)	• There is a reference to Non-voting member while the equivalent UNC text does not.
2.1.3(b)	• the Code Administrator provides Critical Friend guidance which the UNC does not
2.1.3(c)	• a IGT UNC Panel meeting must be held to consider a Derogation Application no less than eight Business Days after a copy of the application has been sent. It is 10 Business Days in the UNC
2.1.6	• In the UNC equivalent of 2.1.6, there is an additional rejection reason listed to those in the IGT UNC
2.1.6(b)	• Excluded Provision is not a defined UNC term
2.1.8(c)	• if the IGT UNC Panel invites a Derogation Application to be re-submitted, it must be placed on a IGT UNC Panel agenda no less than eight Business Days after a copy was submitted. This clause is not time bound within the UNC.
2.1.8(d)	• the IGT UNC Panel can determine additional consultation questions to be added, this is not replicated in the equivalent UNC text
2.1.9(b)	• where the IGT UNC Panel considers and assesses the requested non-compliance against the Code, this is not replicated in the UNC. Also, in 2.1.9 (c) (iv), the request for additional information is also a nuance.
2.1.10	• where the Code Administrator promptly publishes Derogation Applications on the IGT UNC website, this is not replicated within the UNC Code but is within the UNC Derogation Guidance document.

Part O - Derogations	
2.1.15	• where matters relating to the Derogation Application will be deferred to the next IGT UNC Panel meeting if no Party representative is present, this is not replicated in the UNC 2.3 – Impact of UNC Derogation is not replicated in the UNC. The Chair also noted that there is no 'Impact of the Derogation' section in the UNC.
2.4	• IGT UNC Derogation Reporting and Cessation is not replicated in the UNC
2.5	• IGT UNC Derogation Use Cases. AB advised that any Derogation Use Cases would be in the Derogation Guidance Document, and the Workgroup agreed that this list would need to be reviewed to confirm any similarities to 2.5

The Review Group reviewed the IGT UNC Derogations Guidance Document. The Proposer advised that one of the most notable observations from their review of the document was that the structure of the IGT UNC guidance and application form differs significantly from the UNC documentation. They questioned whether this reflected a deliberate design choice or whether the documents had simply never been fully updated following previous process changes.

The Review Group identified a number of formatting, drafting and document maintenance issues. The Code Administrator noted that many of these issues appeared to result from historic amendments not being fully reflected throughout the document. For example, references to appeals remained within the contents structure despite the related provisions no longer existing, creating errors in numbering and document navigation. The Review Group agreed that these issues represented housekeeping matters rather than substantive concerns.

The Review Group considered differences between the IGT UNC and UNC derogation processes. The Code Administrator highlighted that the UNC guidance document includes a pre-derogation engagement stage, allowing discussions to take place before a formal derogation application is submitted. An equivalent stage does not exist within the IGT UNC process, although the Review Group noted that this is consistent with wider governance differences between the two Codes. The Chair observed that, in several areas, requirements included directly within IGT UNC Code provisions are reflected only within UNC guidance documents. Whilst the practical expectations are often similar, the legal status of the requirements therefore differs between the Codes.

The Review Group also identified differences in how supporting evidence is requested from applicants. Whilst both processes require relevant information to accompany applications, it was noted that the UNC guidance contains more explicit examples of supporting evidence, such as process maps and additional documentation. The Code Administrator observed that much of this information is nevertheless captured within the IGT UNC application requirements, albeit presented differently within the guidance and appendices.

The Chair noted that the IGT UNC process requires applicants to provide greater information regarding how they intend to return to compliance at the conclusion of a derogation period. They suggested that the IGT UNC therefore places a greater obligation on applicants to demonstrate a clear route back to compliance than appears to be the case under the UNC arrangements.

The Review Group also discussed several provisions that appear unique to the IGT UNC process, including arrangements allowing another party to assume responsibility for an innovation project, trial or demonstration that is subject to a derogation. It was noted that no derogations have ever been raised under the IGT UNC, meaning the process has never been tested in practice. The Code

Administrator commented that, despite this, the overall framework appears broadly aligned with the UNC process and remains fit for purpose.

September 2026

The Proposer advised that BUUK had undertaken an initial review of IGT UNC Part M (Definitions), which had been published on the IGT UNC website ahead of this meeting. They provided an overview of their review, noting that the IGT UNC defers 25 definitions to the UNC, however these terms are not actually defined in the UNC, thus these 25 terms have no clear definition. They added that the IGT UNC has 167 definitions which are not within the UNC and not deferred to the UNC either. These could be seen as nuanced. The IGT UNC also has 172 definitions which are in the UNC but not deferred to the UNC – this could mean the IGT UNC definitions are worded differently to the UNC equivalents, which will require further consideration, but also a potential opportunity for standardisation.

The Code Administrator confirmed that the Part M review is a long-term task and will continue to evolve over time. The immediate focus is on the 25 deferred definitions to establish their status within the UNC and determine whether they should instead be defined within the IGT UNC. They explained that each term will require individual assessment, including reviewing historical UNC changes to understand whether definitions have been amended, replaced or removed over time. The group of 167 definitions will also be reviewed individually to determine whether these are genuinely IGT UNC-specific terms.

Xoserve advised that they had not yet reviewed the Part M document but would provide comments ahead of the next Review Group meeting.

The Review Group identified the following IGT UNC nuances and housekeeping changes within Part K, Clauses 1-23:

Part K - General	
Clause	**Review Group Discussions**
1.1(b)	• The definition of Framework Agreement differs between the UNC and IGT UNC.
1.2(d)	• The paragraph references its own clause.
1.2(e)	• It was noted that the term transportation arrangement is not capitalised, it is referenced within the definition of Ancillary Agreement but is not itself defined in the IGT UNC. The Code Administrator suggested that Members will determine at a future meeting whether this needs to be specifically defined in the IGT UNC, or if a reference to the Pipeline Operator Licence definition is sufficient.
2.1	• There are some additional/different requirements in the UNC Transportation Principle Document (TPD) V 2.1.2 to Part K 2.1, plus some additional clauses relating to Trader Users.
2.2(b)	• There is an additional UNC requirement to notify the CDSP in UNC TPD V 2.2.2b
All	• There was discussion on references to the Shipper Licence, as it is referred to as Pipeline Users Shipper's Licence elsewhere in the IGT UNC.
4	• The IGT UNC states "to be agreed by the Pipeline Operator" (a single IGT), whereas the

Part K - General	
	equivalent UNC clause states “to be agreed by the Transporters”.
5	• There is an additional requirement in UNC TPD V 4.1, including notifying the CDSP.
6	• The Review Group discussed whether the voluntary discontinuance provisions apply to a Pipeline User ceasing participation across all IGT networks or only in respect of a single Pipeline Operator. A Member raised the point that a Pipeline User may wish to discontinue its participation with one specific IGT while remaining active with others and questioned whether the drafting adequately reflects that scenario. • The Chair explained that admission arrangements are established individually with each Pipeline Operator rather than through a single application process covering all IGTs. The Code Administrator agreed, noting that Shippers sign up and conduct business individually based on their portfolio requirements, suggesting that discontinuance would likewise occur on an individual basis. • The discussion broadened into the role of INCs. The Proposer confirmed that Shipper onboarding and accession arrangements continue to be managed individually by IGTs and that voluntary discontinuance is typically a network-specific process rather than an industry-wide action. However, they questioned whether such provisions should ultimately sit within INCs or be consolidated into a central code framework. • A Member advised that IGTs will need to consider the future of INCs in light of Code Consolidation and Ofgem’s preference to migrate INC provisions into new schedules. While some INCs contain limited content and largely defer to the IGT UNC, it was noted that others include important network-specific provisions, derogations and charging arrangements that may still justify their existence. The Proposer encouraged IGTs to review their existing INCs to ensure they remain current and suitable for any future migration into consolidated schedules.
7.1(a)	• There are different payment terms and a minimum threshold in UNC TPD V 4.3.1(a).
7.1(b)	• UNC TPD V 4.3.1(b) has several additional paragraphs on providing a programme for remedying the breach.
7.2	• There are additional details and monetary thresholds mentioned in UNC TPD V 4.3.2, plus an additional clause 4.3.5 relating to foreign insolvency practitioners.
8.3	• The terms “dispute” and “parties” in respect of any “dispute” are defined here, but these are not defined within Part M (Definitions).
9.5	• Sets out a different process to UNC General Terms Section A (GTA) 2.2.5 in the event an expert is not agreed in 10 business days, involving the President of the Law Society. The Chair and Proposer noted that this clause has never been invoked to their knowledge, and there is potential for it to be removed as part of Code Consolidation work.
11.5	• The equivalent UNC GTA 2.4.5(b) includes the words “which consent shall not be unreasonably withheld” in brackets.
11.9	• The equivalent UNC GTA 2.4.9 includes a page number limit.

Part K - General	
17	• The equivalent process in UNC GTA 1.5 stipulates that this notice cannot be provided via a UK Link communication, whereas the IGT UNC refers to a system communication. There are also minor differences in the wording of the equivalent clauses.
23	• Some equivalence with UNC TPD V 5.3, but the level of detail and definitions differ.
23.6	• Noted a reference in 23.6 to Annex V-10, the Chair responded that they believe it refers to in UNC TPD V Annexes but asked if Xoserve would be able to provide some clarity on this clause, as the CDSP is referenced. Xoserve responded that they would be happy to look at this clause further.

The Review Group agreed to continue reviewing Part K of the IGT UNC in the October meeting as part of the next step in the work for RG008. A Member asked whether the Review Group should also look at appendices K1 and K2, in particular K2 which contains the list of IGT UNC Ancillary Documents. The Review Group agreed that the next task would be to verify that the list is complete, up to date, and accurately reflects the titles of the current Ancillary Documents rather than undertaking a detailed review of each document.

The Review Group noted that, aside from the Derogations Guidance document, the Ancillary Documents had not yet been examined in detail. It was highlighted that some Ancillary Documents contain processes that are unique to the IGT UNC and differ from UNC arrangements, such as transportation invoicing and aspects of new connections. As a result, these documents may require more detailed consideration than a simple comparison against UNC provisions.

The Review Group agreed that where an Ancillary Document directly supports a section of the Code under review, it may be beneficial to review both together. Members considered that this approach had worked well during the review of the derogation provisions and associated guidance. However, some Ancillary Documents may be too extensive or detailed to review alongside Code text and could require separate sessions.

October 2026

The Proposer, Joint Office Representative and the Code Administrator presented findings from their 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. The Joint Office Representative 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 defined terms were reviewed by Members:

Defined Terms	
Term	**Review Group Discussions**
Agency Charging Statement	The Review Group 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.

Defined Terms	
Bottom Stop	The Review Group 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 Review Group 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 Review Group 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	The Review Group confirmed that the definition remains present within the UNC. No immediate action is required.
DM Supply Point	The Review Group 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 Review Group noted 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	The Review Group was uncertain 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).

The Review Group identified the following IGT UNC nuances and housekeeping changes within Part K, Clauses 24-44:

Part K - General	
Clause	**Review Group Discussions**
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.
24.4	• The corresponding UNC provisions are separated into UNC Section 5.6 (Survival). This difference was noted for tracking purposes only.
24.5	• The corresponding UNC provisions are separated into UNC Section 5.6 (Transporter's Licence). This difference was noted for tracking purposes.
24.6	• 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 Review Group 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 Review Group for more detailed consideration, with additional priority because of its data protection and data permissions implications.
25	• 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.
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.

Part K - General	

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.

27	• 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.
30	• 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.
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.
34.1	• The UNC contains additional drafting around the definition of "Notice"; the IGT UNC does not appear to replicate all equivalent requirements.
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.
34.9	• The Review Group 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.
35	• 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.
35.1(a)	• The Review Group 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.
36	• There did not appear to be an equivalent UNC provision.
37	• Query raised regarding whether the Clause should refer to Ancillary Documents as well as Framework Agreement.
38	• Query raised regarding whether the Clause should refer to Ancillary Documents as well

Part K - General	
	as Framework Agreement.
39.2	• The Review Group 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 involve wider participant groups beyond pipeline users alone. Further review would be needed before recommending any change.
40.1	• The Review Group noted the IGT UNC references incidents as affecting 50 supply points. The equivalent UNC threshold is 250 supply points.
41	• 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.
43	• The Standards of Service arrangements appear unique to the IGT UNC. No direct equivalent UNC provisions were identified during the review.
44.1	• The Review Group identified capitalisation inconsistencies; housekeeping corrections were recorded for future consideration.
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	• 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 Review Group concluded the provision remains valid but unusual.
Appendix K-2	• 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.

5 Modifications

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

IGT184 was raised by BUUK on 2nd September 2026. The Purpose of this Modification was to correct housekeeping errors within the IGT UNC Parts CI-CV, L, O and the IGT UNC Derogations Guidance document, all of which had been reviewed as part of RG008.

This Fast Track Self-Governance Modification Proposal was approved by the IGT UNC Panel on 25th September 2026, for implementation on 6th November 2026 (as part of the November 2026 Release.)

The Final Modifications Report, as well as the approved legal text changes, can be found on the IGT184 page of the IGT UNC Website.

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.