

IGT UNC Modification Panel Meeting

Draft Minutes

Friday 26th April 2024

Via teleconference

Attendee	Initials	Organisation	Representing	Notes
Anne Jackson	AJ	Gemserv	Code Administrator	Chair
Andy Eisenberg	AE	E.ON UK	Pipeline Users	
Charles Clark	CC	Ofgem	Authority	Presenter for Item 5
Cher Harris	CH	Indigo Pipelines	Pipeline Operators	
Eilidh McNally	EM	Last Mile Gas	Pipeline Operators	
Gareth Powell	GP	E.ON UK	Observer	Proposer for IGT173
Helen Bevan	HB	Gemserv	Code Administrator	
Jenny Rawlinson	JR	BUUK	Pipeline Operators	
Kirsty Dudley	KD	E.ON UK	Observer	Proposer for IGT173
Matthew Brown	MB	Ofgem	Authority	
Nick King	NK	Barrow Shipping	Observer	Proposer for IGT172
Oorlagh Chapman	OC	Centrica	Pipeline Users	
Harry Firth	HF	Gemserv	Code Administrator	Secretariat

1. Welcomes and Apologies

The Chair welcomed the Panel to the meeting. There were apologies from Lee Greenwood (Centrica). It was noted that Oorlagh Chapman would be acting as Lee Greenwood's alternate.

2. Confirmation of Agenda

The Chair confirmed the items for discussion as outlined in the final agenda. The Panel were invited to add any items for AOB. CH added an item on implementation dates for IGT169 and IGT171. JR and the Chair added an item on updates on the FSO Cross Code Working Group.

3. Approval of the previous minutes (24-03)

The CA invited comments on the March 2024 meeting minutes noting that comments had been made by MB on behalf of Lisa Charlesworth and Sean Winchester prior to the meeting. No comments were raised during the meeting and the minutes were approved as a true and accurate account of the meeting.

4. Outstanding Actions

The Panel were informed that there were 4 outstanding actions:

- **24/03 - 01: Code Administrator to contact Ofgem for presentation on Best Data Practice Guidance at a future IGT UNC Panel Meeting.** Charles Clark was invited to the meeting to

present to the Panel regarding their recent open letter on Best Data Practice Guidance.
Action closed.

- **24/03 - 02: Jenny Rawlinson to circulate information on the Cross Code Working Group.** JR circulated information to Panel about the FSO Cross Code Working Group prior to the meeting and raised an AOB item to provide a further update to Panel on the Working Group. Action closed.
- **24/03 - 03: Matthew Brown to provide feedback from Ofgem on possibility of IGT UNC representation at the Cross Code Working Group.** MB provided feedback to Panel on the possibility of IGT UNC representation at the FSO Cross Code Working Group prior to the meeting. Action closed.
- **24/03 – 04: The Chair to draft a formal letter from the IGT UNC Panel to the Joint Office and the UNC Panel Chair over meeting clashes with the UNC and the IGT UNC.** The Chair informed the Panel that the letter had been drafted. JR noted that they believed that there was now an additional meeting clash since the issue was raised in the March Panel meeting. HF confirmed that a UNC Governance workgroup now clashed with the IGT UNC Workgroup meeting on 9th May. The Chair responded that they would add this new clash to the drafted letter and asked the Panel for feedback on the draft. JR and CH both stated that they were happy with the drafted letter. The Chair added that the letter will be sent to the Joint Office. Action closed.

5. Presentation on Best Data Practices

CC took the Panel through [a presentation on Best Data Practice](#) following an open letter to Codes published in March.

JR asked about timescales around the next steps. CC responded that they are aiming to have a consultation out to Codes before the end of the year. They added that they would expect this first consultation to be out in late summer to early autumn, but warned the release would only occur after the full implementation of the National Energy System Operator (NESO). CC added that prior to the release of the first consultation, they were hoping to engage with people involved with data across all the Codes, including the creation of a steering group to help inform Ofgem of the next steps with Best Data Practice.

JR asked about how General Data Protection Regulation (GDPR) barriers will affect the Best Data Practice work. CC responded regarding smart meter data where there are a number of rules and frameworks in place to protect customer data. They added that there would not be any suggestions to open up any data that would count as personal identifiable information, as the amount of data that can be taken from an individual smart meter is staggering. For aggregated smart meter data that can be released, the minimum amount of data is 10 MPANs, as any lower amount of data would make it

insecure, and it could be possible to de-aggregate the information. CC added that this floor had been established following conversations with several security authorities such as the National Cyber Security Centre (NCSC) and the National Protective Security Authority (NPSA), and the usual levels of aggregated smart meter data will be between 50 and 200 MPANs. CC added that a method of triage had also been developed in detail with these security authorities, and the data sets would only be shared between access-controlled individuals. CC hoped that these measures would provide more comfort with the release of these data sets.

CH asked what IGT data CC would be planning to open up, noting that the example of smart meter data would not apply to IGTs. CC responded that they would hope this would be flushed out more in the steering group, during conversations with representatives from each Code. They added that they have only started working with Codes since March, so they are still trying to get up to speed with what each individual Code covers. CC added that for gas transporters, they would be more concerned with the critical national infrastructure rather than personal identifiable information.

JR asked if one central industry database has been considered. CC responded that an individual database would not be considered due to concerns over leaks, from feeding all the data into one server which would bloat up and become unusable. CC added that the idea of a central data portal has been considered, it would be pulling the relevant data from a vast catalogue and release it to view for individuals cleared to do so. CC added that this is more of an aspirational vision than something that will be realistically put forward now, noting there are several available tools that could provide this service.

JR asked about the steering group and whether there will be a working group as well. CC responded that for now there will just be a steering group because they are hoping for it to be relatively high level. CC added that when the work gets handed back to the Codes, they would support the forming of both steering and working groups going forward.

JR asked CC if they would be building on the work already started by the REC. CC responded that they will be, noting the work the REC and people in other Codes have already started on creating the presumption of openness.

The Chair asked about any current strands of work between Ofgem and the REC, noting their connection to the IGT UNC and REC's aspirations of increased data openness. CC responded that they are supporting a number of modifications put forward in the REC to increase openness and are speaking with the REC on an almost weekly basis.

JR asked about the next steps from the perspective of the IGT UNC. CC responded that they would be looking for volunteers for the steering group, adding that any interested individuals should contact

them via email. CC added that it would be useful to understand what data is held within the IGT UNC and which parties own this data. The Chair asked about a timescale to find volunteers. CC responded that they hoped to have an invite list for the steering group finalised by the end of May, with the first meeting being held at the end of June.

The Chair asked if CC had spoken to the UNC or Xoserve. CC responded that they were planning to present to the UNC next month. CC added that they had spoken to Xoserve at the Energy Market Bodies Forum and via email. They added that Xoserve had seemed enthusiastic on the digitalisation approach and had a number of ideas they would like to put forward and to bring more value to the data.

Modification Business

6. IGT172 – Provision for gas entry within the IGT UNC

Item to be discussed during the Extraordinary Panel Meeting to be arranged due to a quoracy issue.

7. IGT173 – Gateway delivery for RPC data

The Code Administrator took the Panel through the Consultation responses of the Final Modification Report.

Governance

JR offered qualified support for [IGT173 – Gateway Delivery for RPC data](#) to be subject to self-governance, adding that they felt it is unreasonable to ask parties to approve a modification where the costs to them are unknown. They added that there could be a case for the modification to be subject to an Authority decision if an agreement could not be found on the total costs and allocations of the costs between IGTs and Shippers. The Chair added that there are very clear criteria for what should be an Authority Decision Modification, with knowledge around the costs not being part of this criteria. JR responded that they believed there might be something in these criteria relating to individual organisation impacts.

The Chair referred to the ROM response, which states the estimated implementation costs of between £15,000 – £50,000. The Chair and CH agreed that there is no mention of an allocation of these costs in the ROM response. The Chair asked if the decision on this allocation of costs would go to the DSC following Panel deciding to implement the modification. JR confirmed this.

The Chair asked if the self-governance aspect of the modification is the right place to highlight the issue of cost allocation. They added that if Panel were to opt for self-governance, there would be a

vote on implementation later, otherwise it will be sent to the Authority for a decision and there will be no reversal of this decision. JR commented that it is a difficult situation as the cost allocation will not be known regardless of the choice of governance, and that there is nothing in governance to guarantee a set allocation. CH agreed.

AE queried why there was a feeling that Ofgem will be needed to decide on implementation and what differs between this modification and other modifications that have been implemented via self-governance before. JR responded that the issue is around there being no guarantee that IGTs will not be covering all implementation costs for the modification if it was approved for implementation today, whereas a more pragmatic approach to determining the correct cost allocation could be adopted if the decision went to Ofgem. AE responded that they felt that this issue appears to be more of an enduring issue with the modification process, rather than an issue with this specific modification itself, but now this wider issue is being pinned on IGT173. JR agreed that the process is not ideal. AE added that they did not believe this discussion is an appropriate decision point for self-governance. JR agreed, noting that there have been other self-governance modifications implemented where the costs were unknown, but added that for these modifications there was an obvious party who would bear those costs, whereas for this modification, the beneficiaries and thus the parties who should be allocated costs are less clear. AE asked if there was any belief that the modification will end up being 100% IGT funded as there is a clear Shipper benefit. JR agreed but added that this cannot be guaranteed because it is a separate process under the DSC.

CH stated that they would prefer to delay the decision until clarity has been received from the DSC. JR agreed. The Chair asked what the difference between this modification and other modifications that have had a ROM response previously. CH responded that often the IGTs bear the costs by making changes to their own systems, whilst this modification is slightly different. The Chair reminded the Panel that the maximum amount of costs that could be allocated to the IGTs is £50,000. JR responded that nothing is guaranteed until the decision goes to the DSC, noting the wording in the ROM response of "probably not more than £50,000". They added that there may be internal scrutiny if the IGTs sign off on a modification with the costs to them unknown with there being a perfectly good process for RPC data already in place. The Chair responded that if the decision is delayed, Xoserve will never begin working on the solution and the costs will remain unknown.

JR asked if there were any other options or solutions. The Chair queried whether the modification would be considered by the DSC at its current state, noting that it would be a change from the usual modification process. They asked if anyone sits on the DSC or is aware of their processes. AE responded that they sit on the DSC and that from their perspective they cannot see the IGTs picking up the entire costs as there is a clear Shipper benefit. They added that in terms of the wording on the ROM response, Xoserve probably have to word it in a certain way as there is always a risk with

overspending, but the wording should not be taken to mean overspending is likely and that if that happens, Xoserve should be held accountable.

AE stated that they do not believe delaying the modification or opting for an Authority decision is a reasonable thing to do purely because the costs are unknown, particularly considering the maximum cost will likely be £50,000 and the IGTs will likely not be covering all this figure.

JR asked KD if they felt the DSC could potentially be contacted or instructed in advance of a decision that Shippers have agreed to bear at least some of the costs, potentially all the costs or at least a 50-50 split. KD responded that they felt a 50-50 split is a fair starting point for DSC discussions, with any amendments to that allocation then going through the usual governance. They added that throughout their sponsorship of the modification, they have never felt this modification would be 100% IGT funded, noting that some IGTs and Shippers will benefit from the modification more than others based on current processes. They added that the benefits of the modification to improve the protection of customer data is a very important part and should not be forgotten. JR responded that they believed there is already a process in place for protecting customer data and the process changes proposed by the modification carry similar risks to the current processes. KD asked JR if they thought there were data exposure risks with the modification's design. JR responded that the IGTs could post data to the wrong shipper via the IX just like with the current process. KD replied that this had not been their understanding from discussions with Xoserve, but it would be a discussion point for the DSG.

JR added that they are thinking of ways that would make those parties who have given qualified support to the modification the comfort to support implementation, and so the modification will not be rejected. KD responded that if parties feel rejecting the modification is the right thing to do, that is within the process, as is the right to appeal a rejection. They added that this modification will not be able to progress within the DSC as that is linked to the Panel's decision, and unless there is an insertion of the starting position of the percentage splits within the ROM response, they were unsure how this conversation will move on.

JR suggested that an agreement of the split could be included within the ROM response. KD responded that this could be included as a recommendation for the modification, but the final decision on the cost's allocation will still be made by the DSC.

The Chair took the Panel through the criteria for self-governance of modifications. KD went through their reasoning as Proposer for the modification to be self-governed, adding that they felt if the financial impact of the modification was to cause it to be an Authority decision, it would have to be clearly articulated. They added that Ofgem would only be able to make a decision based upon the commercial benefits of the modification, not on the cost split as that is governed elsewhere.

At this point, OC had to leave the meeting briefly.

The Chair added that the self-governance criteria is clearly defined, and they were not sure the argument on costs fell under the issue of governance. AE agreed. JR responded that they thought it could potentially fall into two areas and asked MB for their opinion as an Authority representative. MB replied that Ofgem were happy with this modification falling under self-governance and that if it came to an Authority decision, they would be less well placed to make a decision than Panel.

AE stated that they believed the Panel's decision is whether the modification is a good idea and should be implemented for the industry as a whole. The Chair agreed and added that Panel need to believe the modification has a positive impact on at least one of the relevant objectives. AE added that whether the modification process needs to be looked at or there needs to be further discussions on the cost allocations, this is a different issue to whether the modification should be implemented, which is what Panel are voting on at this meeting.

The Chair reminded Panel that the first vote will be on governance and asked if they are ready to vote. JR and AE agreed that it should be self-governance. JR added that the modification process is flawed, especially that the costings decisions will be voted on by the DSC.

At this point the Panel moved to vote on the governance of the modification. The Chair indicated OC would need to return to the meeting as the meeting was not currently quorate. They noted that OC had not been present for some of the discussion on the modification.

OC returned to the meeting and indicated that they would have to leave the meeting permanently and asked if they could pass their vote to AE if they were already acting as an alternate. The Chair responded that they would have to refer to the Code rules. JR asked if Panel members were able to decide if the voting rights could be passed from OC to AE and CH indicated they would be happy for this to happen. The Chair responded that they would have to consult the rules first to determine what could be permitted.

OC left the meeting.

After a short break, the Chair indicated that the rules were not specific in determining whether an alternate was able to pass on their voting rights to another member and added that they were not comfortable with in allowing it to happen based on their understanding of the Code.

KD added that they felt it had not been permitted when this situation had arisen previously, and at that time the meeting had to be reconvened. They suggested that the meeting could be reconvened next week, and in the meantime, they could speak to the DSC about establishing a starting point for

discussions on costs allocations, if this would resolve some of the issues with the modification for some members. JR asked KD that if this starting point was established as a 50-50 split, where they foresaw this split moving. KD responded that they would not want to comment on that but reiterated that their proposal would be to make a suggestion of a formal starting point of a 50-50 split to the DSC.

KD asked if OC writing in the meeting chat that they supported the implementation of both IGT172 and IGT173 was sufficient enough to consider as a cast vote. The Chair responded that Panel members were needed to vote on several aspects for each modification, including the governance, solution, and ultimately implementation. KD agreed that OC's message was not detailed enough.

The Chair informed that given OC's vote could not be passed on, Panel was no longer quorate, and the modification business would have to be suspended until a reconvened meeting could be rearranged, ideally for next week. AE responded that they would be unavailable for a meeting next week. KD suggested that they could make themselves available if AE appointed them as their alternate, which AE was happy to do.

JR asked about the timeframe for arranging a reconvened Panel meeting. The Chair responded that the Code Administrator would usually have to give a week's notice, meaning the earliest date for a reconvened meeting could be 3rd May. They added that the Code Administrator would contact Panel members for their upcoming availability and arrange a date for the reconvened meeting offline.

24/04 – 01: Code Administrator to arrange an Extraordinary Panel Meeting as soon as possible to complete the outstanding Modification business

8. Authority Updates

MB informed the Panel that:

- Ofgem's [joint consultation with DESNZ on code manager selection regulations and code manager licence conditions](#), remains open until 5 May 2024.
- Ofgem's consultation on the implementation of Energy Code Reform closed on 23 April 2024. They are reviewing and analysing all responses received and will publish their decision in due course.
- Ofgem are grateful to industry colleagues who volunteered to join the Modification Process Workgroup (MPW). To ensure visibility for wider stakeholders Ofgem have published [a list of members on their website](#). Ofgem held an introductory meeting with members of the MPW on 17 April. It was an opportunity for the group to meet, agree ways of working and discuss content and sequencing for future sessions. Ofgem expect there will be 5 meetings of the MPW between May – July this year. The outputs from the meetings will help inform policy

development ahead of Ofgem's next consultation on implementing energy code reform. Ofgem will provide updates from each of the sessions at panel meetings.

9. Ofgem's Expected Decision Dates

The Panel were directed to Ofgem's latest Expected Decision Dates which were published on 02 April 2024. The table stipulated that:

- [UNC 0841 - Introduction of cost efficiency and transparency requirements for the CDSP budget](#) is due for publication on 17 May 2024
- [UNC 0852 - Shipper notification in relation to option exercise for customer DSR](#) is due for publication on 9 May 2024
- [UNC 0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#) is due for publication on 10 May 2024

MB informed the Panel that the next version of the Expected Decisions Dates table is set to be published by Ofgem on 02 May 2024.

AOB

10. **IGT169 and IGT171 Implementation Dates**

CH informed the Panel that during the IGTAD meeting earlier this week, it was noted that the UNC equivalent modifications of [IGT169 - Aligning the Capacity requirements for NExA Supply Points in the UNC with Capacity requirements for LDZ CSEP Ancillary Agreement \(LCAA\) Supply Points under the IGT UNC \(i.e. bringing Code in line with UNC0701 and UNC0853\)](#) and [IGT171 - Settlement Adjustments for Supply Meter Points impacted by the Central Switching System P1 Incident](#) had been implemented, yet neither of the IGT UNC modifications had been implemented yet. The Chair asked HB about the implementation dates for these modifications. HB responded that for IGT171, the CDSP had been aiming for a June release when the modification was approved in January. They added that this date had not been confirmed by the CDSP yet, but the modification design was approved in April.

The Chair noted that the Panel had agreed in October 2023 that IGT169 should be implemented as an extraordinary release the day following the Authority's decision. HB confirmed that the Authority had approved the modification towards the end of March. The Chair informed the Panel that this extraordinary release would come out as soon as possible. HB confirmed that this would be released within the next week.

POST-MEETING NOTE: VERSION 13.19 OF THE IGT UNC WAS RELEASED ON 29TH APRIL AS AN EXTRAORDINARY RELEASE.

JR asked if there is anything that needs to be done to ensure future implementation of modifications are not missed going forward. The Chair responded that they would have to conduct a review into what happened with IGT169 and would report back to Panel once this review is completed. They added that it was Panel who usually decide how a modification is implemented and the Code Administrator will act depending on that decision and/or the approval decision.

24/04 – 02: Code Administrator to review implementation procedures and report back to Panel regarding steps being taken to ensure implementation is timely and appropriate.

11. FSO Cross Code Working Group

JR informed the Panel that since the last meeting, MB had put them in touch with an Ofgem colleague overseeing the FSO Cross Code Working Group and they had attended a meeting on 18th April. They added that the work is very advanced, and most Codes have identified what impacts they will have and are now drafting those changes to their Codes. They added that Ofgem have advised they will share the UNC Code changes once they have received them, noting that any IGT UNC changes are likely to mirror the UNC Code changes.

JR informed the Panel that the next meeting of the working group is on 2nd May 2024, and they plan to release a consultation during May. They added that they and the Chair felt it may be useful to invite a UNC representative to talk through the impacts of the working group on the UNC and thus the IGT UNC. The Chair added that they had tried to get one of the UNC parties to attend the April Panel meeting, but it was not possible, and they would try to get a UNC representative to attend a future Panel meeting.

24/04 – 03: Code Administrator to arrange for a UNC representative on the FSO Cross Code Working Group to provide feedback to Panel on proposed UNC and IGT UNC impacts.

12. IGT UNC Representation at the Best Data Practice Steering Group

The Chair asked the Panel if they wished to discuss IGT representatives at the Best Data Practice Steering Group, noting that it could be discussed at the Extraordinary Panel meeting to allow for parties to think about it. JR responded that they were happy to discuss it now, adding that it would be practical not to extend the extraordinary meeting due to potential time constraints.

The Chair asked Panel how they would like to proceed following CC's presentation earlier. JR responded that the IGT UNC should be involved in the steering group and that BUUK would be happy to represent the Code at the steering group, and report back to the IGT UNC. CH added that it would

be good to have representation at the steering group, so that it can be clear how the Best Data Practice work will affect the IGT UNC.

The Chair asked Panel if they would be happy for BUUK to represent the IGT UNC at the steering group and whether they should report back to Panel or the Workgroup. The Panel agreed they were happy with this arrangement. JR suggested that they could report back to both Panel and Workgroup and CH agreed, noting the wider range of representatives who usually attend the Workgroup.

24/04 – 04: BUUK to provide feedback to the Panel and the IGT UNC Workgroup on the Ofgem Best Data Practice Steering Group

The Extraordinary Panel meeting is scheduled for Tuesday 30th April 2024

The next routine IGT UNC Panel meeting is scheduled for Friday 24th May 2024

Annex 1 – Actions Table

Reference	Action	Owner	Status
24/03 – 01	<i>Code Administrator to contact Ofgem for presentation on Best Data Practice Guidance at a future IGT UNC Panel Meeting</i>	<i>Code Administrator</i>	<i>Closed</i>
24/03 – 02	<i>Jenny Rawlinson to circulate information on the Cross Code Working Group.</i>	<i>JR</i>	<i>Closed</i>
24/03 - 03	<i>Matthew Brown to provide feedback from Ofgem on possibility of IGT UNC representation at the Cross Code Working Group.</i>	<i>MB</i>	<i>Closed</i>
24/03 - 04	<i>The Chair to draft a formal letter from the IGT UNC Panel to the Joint Office and the UNC Panel Chair over meeting clashes with the UNC and the IGT UNC.</i>	<i>Chair</i>	<i>Closed</i>
24/04 - 01	Code Administrator to arrange an Extraordinary Panel Meeting as soon as possible to complete the outstanding Modification business	Code Administrator	Open
24/04 - 02	Code Administrator to review implementation procedures and report back to Panel regarding steps being taken to ensure implementation is timely and appropriate.	Code Administrator	Open
24/04 - 03	Code Administrator to arrange for a UNC representative on the FSO Cross Code Working Group to provide feedback to Panel on proposed UNC and IGT UNC impacts	Code Administrator	Open
24/04 - 04	BUUK to provide feedback to the Panel and the IGT UNC Workgroup on the Ofgem Best Data Practice Steering Group	BUUK	Open