

IGT UNC 24-03 Modification Workstream Meeting

Final Minutes

Thursday, 14th March 2024 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Charlotte Gilbert	CG	BUUK	
Cher Harris	CH	Indigo Pipelines	
Eilidh McNally	EM	Last Mile Gas	
Helen Bevan	HB	Gemserv	
Gareth Powell	GP	E.ON UK	Proposer for IGT173
Kathryn Adesev	KA	CDSP	
Kirsty Dudley	KD	E.ON UK	Proposer for IGT173
Lee Greenwood	LG	Centrica	
Nick King	NK	Barrow Shipping	Proposer for IGT172
Talia Lattimore	TL	Gemserv	Observer
Isaac Moore	IM	Gemserv	Secretariat

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting and accepted apologies received from David Morley (DM).

2. Confirmation of Agenda

The Chair confirmed the items for discussion as outlined in the Final Agenda and asked attendees for 'Any Other Business' (AOB) items, which there were none.

3. Approval of the Previous Minutes 24-02 and IGT172 additional meeting minutes

The Chair informed the Workgroup that comments were received for the draft 24-02 Modification Workstream meeting minutes prior to the meeting.

KA mentioned that they had submitted comments regarding their presentation of the ROM for Modification IGT173 at the 24-02 Workgroup. The Chair noted that any discussions on the presentation would be included within the minutes, but not necessarily the information from the presentation itself. It was agreed that additional detail in respect of KA's presentation would be added to the minutes.

KD mentioned was that GP had been omitted from the minutes as an attendee and indicated an action had been overlooked. presented an additional action. HB indicated where the matter had been captured in the minutes.

The Chair agreed to amend and republish the minutes with these further amendments, which would be submitted to the April 2024 IGT UNC Workstream meeting for final approval.

The Chair introduced the amended minutes for the IGT172 additional meeting specifically for review of the IGT172 legal drafting. NK mentioned that the UNC's associated Modification was currently being held by Ofgem for decision, that they would like to correct them as soon as possible.

NK presented their amended minutes to the Workgroup, noting that the terminology was being changed to reflect the definitions of Tripartite Network Entry Agreement and Pipeline Entry Agreement in the UNC and IGT UNC.

The Chair queried if the draft Network Entry Agreement (NEA) that NK would receive from SGN would be available in the public domain. NK responded that this was something to ask SGN.

The Chair agreed to republish the change marked version of the minutes, which would be submitted to the April 2024 IGT UNC Workstream meeting for final approval.

24/03 – 01: Code Administrator to republish meeting minutes from February 2024 IGT UNC Workstream meeting and Additional IGT172 meeting prior to April 2024 IGT UNC Workstream meeting.

4. Outstanding Actions

The Chair informed the Workgroup that there were two outstanding actions as follows:

- **24/01 – 06: IGTs consider implications of UNC0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers and the need for a solution to cover the IGT UNC.** The Chair informed the Workgroup that this item would be covered in the Cross-Code Modifications Implications Tracker. Action closed.
- **24/01 – 07 (Missing action): IGTs to consider the 6-month delivery of the IGT173 Modification solution.** This was agreed to be covered under item 9. Action closed.

Standing Items

5. Cross Code Modifications Implications Tracker

The Code Administrator provided the Workgroup with the following updates:

Watch List

- **UNC0867 and 0866. HB noted that these had not been covered previously.**

HB presented minor changes to the Modification watchlist.

IGT UNC Equivalent Modifications

HB highlighted the UNC Modifications which had an IGT UNC equivalent raised against them. KA mentioned that [UNC0867 - Gas Demand Side Response \(DSR\) Aggregation Arrangements](#) and [UNC0866 - Amendments to Demand Side Response \(DSR\) Arrangements](#) might require IGT equivalents, as the CDSP understood that there could be possible IGT UNC impacts. They added that this would be communicated to the Proposer. KA added that in [UNC0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#), the UNC legal text would currently not cover the IGT UNC. The Chair mentioned that the IGT UNC could point to UNC legal text, but the Modification references a Distribution Network risk. The Chair added that it was for IGTs to determine if they were subject to the same risk as DNs. CG believed that the text does not impact IGTs. The Chair agreed to raise an action that the Code Administrator would review the legal text to determine impacts. They added that the issue of risks to IGTs was separate from the legal drafting.

24/03 – 02: Code Administrator to review the legal drafting of UNC modifications 0866 and 0867 to determine the impacts upon the IGT UNC.

UNC0865: CG mentioned that they understood that this Modification would not affect IGTs or the IGT UNC. The Chair agreed and CG indicated that there would be no negative charges this year. The Workgroup agreed that there would be no impact.

UNC0864 (Fax References): The Chair informed the Workgroup that they were expecting an IGT UNC Modification to be raised, which would need a Proposer. CG added that there were Fax references in the IGT UNC and IGTAD. They mentioned that they believed this issue would be covered at the Cross Code Steering Group (CCSG). HB informed the Workgroup that this Modification had not been covered at previous CCSG meetings.

LG queried if the fax systems had been shut down. CG responded that they believed that fax would be ended in December 2025. KD mentioned that they believed that there would need to be an IGT UNC Modification, and that this needed to be coordinated with the other codes. The Chair agreed with this approach. KD added that emergency contacts back up would be the principal system still using fax. They believed that there should be coordinated response between IGTs and Shippers.

The Chair informed the Workgroup that the REC and the UNC had not yet found a solution. CG mentioned that the UNC Modification was at the Governance Workgroup. KD mentioned that any cross-code approach had no incentive from a governance viewpoint. The Chair added that the REC could raise a Modification in the IGT UNC, but not the UNC. KD mentioned that the Code Administration Code of Practice (CACoP) would help to find a solution. CG queried if HB could raise this issue at the CCSG. HB agreed to do this.

24/03 – 03: Code Administrator to raise the issue of fax references (UNC 0864) at the next Cross Code Steering Group.

The Chair noted the previous action on IGTs to determine any implications from [UNC 0864 - Update of UNC Code Communication Methods](#) had now closed.

UNC0863: KA informed the Workgroup that this Modification was currently on hold in the UNC until further confirmation from the Proposer.

UNC0856: KD mentioned that a letter was sent regarding National Gas ceasing the development of the NDM trials, and that they could not see a need for an IGT UNC Modification at this time. The Workgroup agreed.

UNC0841: KD and CG understood that an IGT UNC Modification was not necessary as there would be no impact.

The Chair noted that by UNC Workgroups indicating that a Modification might have a possible IGT UNC impact would not automatically imply that any risk in this respect was mitigated. They added that there was an issue that some of the UNC Modifications were advanced stages in the development process, without an IGT UNC equivalent being raised.

6. Known Issues Register

- Shipper representation: HB noted that the Panel now had 2 Shipper representatives.
- CSEP Ancillary agreement: HB noted that NK had provided a definition, and this was not being used. NK noted that there were still references to sections of Code that had been changed, regarding CSEPs. The Chair suggested that this item be removed from the Register. The Workgroup agreed.
- Overlapping meetings: KA noted that IGT UNC Workgroups had been overlapping with UNC Governance Workgroups. CG noted that there were clashes, as the UNC Workgroup dates had been changed. The Chair noted this issue, and queried if the Workgroup would like to consider a new date for the IGT UNC Workstream meeting. They also reminded the Workgroup that the meeting dates are approved by the IGT UNC Panel in January for the following year. The Workgroup agreed to keep the IGT UNC Workstream dates, noting that the IGT UNC meeting dates are consistent and agreed long in advance.
- Metering Arrangements from the IGT UNC: KD noted that with Code Reform coming into place, this issue could become more relevant.
- KD suggested that the items of Party Engagement and Performance Assurance could be closed. The Workgroup agreed.
- MAM/MEM consistency: The Chair noted that this would need to be addressed through a housekeeping Modification.
- Performance Assurance Report Register (PARR). The Chair noted that this was resolved in February 2024 and suggested this item could be closed. The Workgroup agreed.
- CA to develop a Cross Code ways of working strawman: The Chair mentioned that this was no longer relevant in the context of Code Reform and suggested this item could be closed. The Workgroup agreed.

The Chair added an additional item to the Known Issues Register

- An additional definition would need to be added as the implementation of IGT132VV meant that a clause was overwritten, including three definitions. The Chair added that this had been partially reversed through Modification IGT173, and that one more definition would need to be added.

Modifications

7. IGT165

The Chair informed the Panel that the Proposer had indicated that there was no further work to be done on [IGT165 – Independent Shrinkage Expert and Independent Shrinkage Charge](#), and that further discussion would be taking place at the [UNC0843 - Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert](#) Workgroups. The Chair added that the Proposer was waiting on the UNC legal drafting.

CG queried if a new ROM would be available. KA informed Workgroup that a ROM had been requested by the CDSP and would be available at the following IGT UNC Workstream meeting.

KA added that the ROM would need to be changed as the Proposer had changed the Modification from approval to disapproval by the Authority. They added that it was not expected to change the parts of the ROM relating to Gemini and IGTs. The Chair mentioned that they understood that Gemini changes would be made under UNC governance, not under the IGT UNC. The Workgroup agreed that this ROM should be covered at the April 2024 IGT UNC Workstream.

CG mentioned that UNC0843 would be covered under a separate Workgroup at the UNC.

8. IGT172 - Provision for gas entry within the IGT UNC

The Chair informed the Workgroup that following the IGT172 legal drafting meeting discussions, at which the Workgroup had agreed that the legal drafting needed no further work, that the Workgroup Report for this Modification should follow. The Workgroup agreed with this approach.

The Chair indicated that the timetable would need to be amended, to reflect the revised timetable. This Modification would be presented at the March 2024 IGT UNC Panel, and the Final Modification Report would be ready for the April 2024 Panel. The Chair mentioned that the consultation period would overlap with the Easter Holidays.

Solution

KD queried if Tripartite Agreement was a defined term. The Workgroup agreed to keep the term capitalised.

The Workgroup agreed that sufficient discussion had taken place, considering the IGT172 legal drafting meeting.

NK mentioned that in the context of IGT UNC and UNC Code Reform, this Modification could help to simplify that task, as this Modification is based on the processes and legal drafting within the UNC. The Workgroup also agreed that maintaining this uniformity would be beneficial to the consolidation of the codes.

Impacts & other considerations

The Chair noted that this Modification would facilitate the connection of Biomethane plants to the network. The Proposer highlighted that having an alternative means of connecting to the grid will reduce costs. They added that there are consumers who would like to buy green gas, and that green gas production is not large scale because of costs. Current producers only have an option to connect through a DN network. An alternative option, granted by IGT172, has the potential to lower costs, provide a better service, and greater availability for consumers.

KD mentioned the Green Gas Levy costs which could potentially affect consumer bills. CH suggested that for the purposes of this Modification, green gas would be a small amount in the Shipper portfolio. They added that as this levy was for Suppliers, it would not concern an IGT UNC Modification as the code is only between Shippers and IGTs. KD queried if this question was captured in the UNC0843 Workgroup Report. The Proposer responded that it was. The Chair mentioned that the carbon neutral nature of green gas should be captured in the Workgroup Report.

Cross-Code Impacts

The Chair queried KA if there were any system impacts from this Modification. KA confirmed that there were no central system impacts.

Implementation

CH queried that this Modification was an enabler, and that the timing would allow the parties to set up their processes system. The Chair queried if any parties could be harmed if this Modification were to be implemented now. The Proposer responded that no harm would be done.

The Chair queried the Workgroup if they would be satisfied if this Modification did not have an implementation lead time. The Workgroup agreed that it was likely to be necessary, highlighting that parties could share their views in the consultation response to the Modification.

Decisions:

The Workgroup agreed:

- That the Modification should stay under Authority decision, with UNC0842.

- That an implementation should be done in parallel with UNC0842.
- That the Modification should be sent to the Panel for approval before a three-week consultation.

9. IGT173 - Gateway Delivery for RPC Data

The Chair invited the Proposer to present the updates to the Modification.

The Chair invited comments on the changes, including the new definition required due to the implemented legal drafting from IGT132VV.

KA mentioned that a few points discussed in the February 2024 Workstream were not added in the edited version of the modification. KA mentioned that in Business Rule 3, the ROM response included support from the CDSP in business-as-usual circumstances, but that the text “not limited to existing governance procedures” was not supported by the CDSP. KD queried why this would cause an issue. KA responded that this was not defined anywhere. KD said this would not change the direction of the Business Rule, and that they would not be amending the Modification Proposal. The Chair mentioned that this rule was not captured in the legal drafting of the Modification. KD added that it was added for support. The Chair queried if there would be an amendment in the DSC. KA responded that there would not be. KA and KD concluded that the business-as-usual process would be clarified.

KA mentioned that in Business Rule 9.3, the event of catastrophic failure is when DSC contract managers will be sent a notification. In the event of issues with sending individual files, these files will go into the error directory of the sending IGT as per current processes.

Legal Drafting

The Chair informed the Workgroup:

- that the definition of “Invoice Document” had been edited to reflect that RPC backing data was included in it.
- The RPC Supporting Data definition has been added.
- System Failure clauses (I) through (III) were added. KA queried on the use of the language “to receive”, rather than “to send”. The Chair queried KA if the UK Link transfer went through the CDSP or bypassed them entirely. KA explained that the CDSP received the file, read the address, and sent the file to its destination. The Chair noted that there was a possible point of failure due to this step in the file transfer process. KD added that as part of a post implementation review, they would review this process and decide if anything needed to be amended. The Chair mentioned that the IX was not defined in the IGT UNC, and that UK Link was the database.

Invoice Document

- Clause 4.6: The Chair informed the Workgroup that this clause had been amended to demonstrate that RPC Supporting Data would be handled in a different way to the rest of the data, and that Pipeline Users were required to ensure that invoice data/documents could be received. CH queried if it was necessary to include “the manner described in the Manual”. The Chair responded that there was no previous legal text for the RPC Supporting data. The inclusion of this in the clause was to try to specify that Pipeline Operators will send other supporting data and invoice documents via methods they currently use, to keep as much unchanged as possible. KD mentioned that perhaps this process should be redrafted, separately from this Modification. The Chair suggested an alternative version “excluding the RPC Supporting Data”.
- Clause 4.7: KD queried whether the use of the definition “UK Link Distribution” could be linked here, as it is an already defined term in the IGT UNC. KD asked KA whether they agreed. KA responded that they had raised this before, and the Chair had responded on this
- Clause 5.3: CG queried what the process would be, if the IGT did not have the contact information for the Shipper. KD mentioned that there was a Business Rule, where the IGT would contact the CDSP to receive the right contact. CG queried if this should be changed in the Business Rule. The Proposer suggested that this should be part of a post-implementation review if this issue were to come up.
- Clause 44.5: CG suggested that a note in the Ancillary Agreement would cover the Change of Communication clause.

IGT Transportation Charges Invoice Template Document

The Proposer highlighted their discussion with the CDSP.

- File Naming Convention: KA clarified that N would be used in the file type.
- Temporary provisions: The Chair noted that an update had been provided regarding the mechanism of sending data, for data created both prior and after the implementation of the modification.

Workgroup report

The Chair highlighted a date error in the timetable, which was amended. They noted that following a consultation, the Final Modification report would be present at the April 2024 Panel, assuming a three-week consultation.

KA added that the CDSP would ensure that all new entrants to the Market would be supported, based on the already approved and defined governance processes. KD added that they intended to put in place a post-implementation review in the months following an approval of the Modification. These would be at 1, 3, and 6 months after implementation.

KA queried if KD had already planned for a specific implementation date. Parties agreed to cover this in the implementation section of the Workgroup Report.

LG queried if the explanatory text in the areas of consumer benefit table was necessary. The Chair responded that this allowed the Modification to be auditable. The Proposer added that they would keep this text if the governance of the Modification was challenged.

Impacts and considerations

KD mentioned that sending these files through the IX would be more secure, and that this Modification would improve security and reliability.

Implementation

The Proposer queried if a November 2024 implementation was still reasonable. LG mentioned that their team would like a 6-month period between approval and implementation. KA queried if the timeline would be from design approval, or final approval. They noted that DSC Change would still need to approve the Modification design. KD believed that this would not impact a November 2024 implementation. They added that approval to implementation periods were indicatively set at 6 months, but that this was not binding. The Proposer queried if this should be a question in the consultation for the Modification, adding that it was up to parties to decide if a November release was feasible. The Chair suggested that highlighting that the XRN was already raised would be helpful. CG added that the Workgroup could not reach a final answer, as not all the IGTs were present on the call.

There was no consensus in the Workgroup regarding an implementation date, and the Workgroup recommended that the question of implementation date be highlighted in the consultation.

The Proposer noted that there was more pressure on IGTs, as they would be receiving the backing data and would need to build their own processes to fit this Modification.

Decisions

The Workgroup agreed:

- To support that the Modification be subject to Self-Governance.
- That the consumer impacts were correctly identified.
- That a positive impact on Relevant Objective (F) was appropriate for this Modification
- That the legal text met the purpose of the Solution, subject to the minor changes agreed in the meeting.
- That the Modification be sent for a three-week consultation, including an additional question on the release schedule.

10. AOB

Standards of Service Report

CG queried if this report, from IGTs to Shippers, was still useful. KD mentioned that not all IGTs currently send the report, and that any changes to the rules would require an amendment to the Standards of Service. They also mentioned that there was little appetite to either change the rules or make the reports mandatory. KD suggested that the report could be placed on the Known Issues register. They felt that change would happen in the context of Code Reform. The Chair invited the Workgroup to review this issue in the future.

The next Workgroup meeting is scheduled for Thursday 11th April.

Annex 1 – Actions Table

Reference	Action	Owner	Status
24/01 – 06	<i>IGTs consider implications of UNC0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers and the need for a solution to cover the IGT UNC.</i>	<i>IGTs</i>	<i>Closed</i>
24/02 – 01(missing)	<i>IGTs to consider the 6-month delivery of the IGT173 Modification solution.</i>	<i>IGTs</i>	<i>Closed</i>
24/03 - 01	Code Administrator to republish meeting minutes from February 2024 IGT UNC Workstream meeting and Additional IGT172 meeting prior to April 2024 IGT UNC Workstream meeting.	Code Administrator	Open
24/03 - 02	Code Administrator to review the legal drafting of UNC modifications 0866 and 0867 to determine the impacts upon the IGT UNC.	Code Administrator	Open
24/03 - 03	Code Administrator to raise the issue of fax references (UNC 0864) at the next Cross Code Steering Group.	Code Administrator	Open

