

IGT UNC 24-06 Modification Workstream Meeting

Draft Minutes

Thursday 13th June 2024 via Teleconference

| Attendee | Initial | Organisation | Notes |
|-------------------|---------|------------------|--------------------|
| Rachel Clarke | RC | Gemserv | Chair |
| Charlotte Gilbert | CG | BUUK | |
| Cher Harris | NK | Indigo Pipelines | |
| Kathryn Adeseye | KA | CDSP | |
| Lee Greenwood | LG | Centrica | |
| Matthew Brown | MB | Ofgem | |
| Michelle Brown | MIB | Energy Assets | |
| Nick King | NK | Barrow Shipping | |
| Talia Lattimore | TL | Gemserv | Code Administrator |
| Harry Firth | HF | Gemserv | Secretariat |

1. Welcome and Apologies for Absence

The Chair welcomed attendees to the meeting and accepted apologies received from Anne Jackson, Eilidh McNally, Jenny Rawlinson and Kirsty Dudley.

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. The Chair added item 8 – Annual IGT UNC AQ Value tables and item 9 – Authority update including the Ofgem Pre-election moratorium.

3. Approval of the Previous Minutes 24-05

HF informed the Workgroup that no comments were received for the draft 24-05 Modification Workstream meeting minutes prior to the meeting. The Workgroup had no comments to add to the minutes at the meeting and they were approved as a true and accurate record of the meeting.

4. Outstanding Actions

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

24/04 – 03: Code Administrator to contact REC and SEC Code Managers to determine which governance framework ASN files fall under. HF informed the Workgroup that the SEC Code Manager had been in contact to confirm that Advanced Shipment Notification (ASN) files are not governed under the SEC. The SEC Code Manager confirmed that the only reference to ASN files in their Code was in reference to the communications hub and as metering is governed under commercial agreements, it is likely that ASN files will be governed under these same agreements.



CG asked if Scottish Power want anything further from this action. HF responded that it appeared Scottish Power originally raised an item with the intention of raising a Modification around enforcing the provision of historic ASN files. They added that once Scottish Power have been informed that the governance of these files is not held under the IGT UNC, it is up to them to potentially progress this item elsewhere. The Workgroup agreed.

Action closed.

24/04 – 04: IGTs and Shippers to provide information to E.ON UK on potential scenarios and timings for IGT173 testing period. HF informed the Workgroup that E.ON were continuing to work on proposals for the IGT173 testing period and was planning to bring a paper to a future Workgroup. They added that E.ON were happy to keep this action open if any other interested parties wanted to provide feedback on the testing period.

CG added that they believed it made sense to test the IX during their October billing run that takes place on 2nd November, using dummy data on this test run to avoid any risks. KA noted that IGT173 is due to be implemented on 8th November. The Chair asked KA if there would be enough time for the CDSP to address any issues that are raised during the testing prior to implementation. KA responded that they would have to consult colleagues working within DSC Change, suggesting that it may be tight to fix before implementation if there were issues, but also there would be time to fix these issues before the November billing run at the beginning of December. LG added that the Change Pack is expected to come out next month.

CG added that BUUK will also add their backing data to their own internal portal in addition to the IX. They noted that some Shippers prefer that option and there is nothing in the Modification's legal text to prevent that. They added that in the event of the IX going down, they will revert to sending RPC backing data via their internal portal as the files are too large to send via email. The Chair and TL agreed to update E.ON of these discussions ahead of a potential paper being submitted for a future Workgroup meeting.

24/06 – 01: Code Administrator to update E.ON UK of the discussions around the proposed IGT173 testing period from the IGT UNC June Workgroup.

Action carried forward to IGT UNC 24-07 Workgroup.

24/05 – 01: Code Administrator to review the IGT UNC and UNC 0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers to determine whether the IGT UNC rules on terminated users require further review. TL informed the Workgroup that the Code Administrator has reviewed UNC 0854 and suggested that a Modification would be required if the CDSP was looking to terminate the IGT supply points under the UNC, which means these terminated supply points cannot be active on an IGT network.

KA added that the CDSP will support an IGT UNC Modification as the solution in practice for UNC 0843 will be applied to both GT and IGT. The Code Administrator appealed for any Workgroup



members to come forward to sponsor the Modification and contact them via the IGT UNC email address.

5. Statutory consultation - establishing the Independent System Operator and Planner (ISOP) in GB industry codes 2024 – Ofgem. TL informed the Workgroup that the Code Administrator had met with BUUK and Ofgem to discuss the Modifications proposed in the <u>ISOP consultation</u> recently released by Ofgem. They added that proposed Modifications in the consultation had not included any changes to the IGT UNC, but both the Code Administrator and BUUK had highlighted some areas that require consideration.

TL informed the Workgroup that proposed changes to the UNC include an amendment to the Gas Transporter License to ensure that all license conditions can be fulfilled. BUUK are currently reviewing whether the IGT's license will be affected so a similar change will be needed to the IGT UNC.

TL added that if there are no required IGT license changes, National Gas Transmission and the Distribution Networks may consider if any changes are needed to the Independant Gas Transporters Arrangement Document (IGTAD), to ensure they have the cooperation of IGT's and Shippers using their networks.

TL added that any UNC changes could alter legal text referenced in the IGT UNC Code, and these references will need to be checked or a Modification raised in the future to ensure these references remain correct.

TL informed the Workgroup that the consultation is due to close on 17th June, the Authority are aware of these discussions, and suggested that a more detailed discussion can take place at the July Workgroup, when BUUK can provide more information on any potential license changes needed. CG added that BUUK had so far not picked anything in the proposed UNC license changes that would require further action for the IGT UNC, as the changes mostly reference transmission

TL noted that the Department of Energy Security and Net Zero (DESNZ) are looking to use their current powers to implement these changes to the UNC as quickly as possible, but it is unlikely that they would do the same for any IGT UNC changes. TL added that Ofgem could use the urgency facility for any IGT UNC modifications that may be required quickly as a result of the changes to the UNC.

CG noted that the legal text for the proposed UNC Modification is available, and BUUK had also queried whether references to the ISOP Framework Agreement will be needed. CG added that they are happy to review the proposed UNC changes and present their findings at the July Workgroup. RC and TL agreed and thanked CG.



Action 24/06 – 02: Charlotte Gilbert to review the suggested modifications to the UNC Code proposed by the Statutory consultation - establishing the Independent System Operator and Planner (ISOP) in GB industry codes 2024

6. Cross Code Modification Implications Tracker

TL provided the Workgroup with the following updates:

Watch List

- 0876 Updates to the Annual Quantity (AQ) amendment process: TL suggested that the IGT UNC will not require updating, but updates made to the AQ amendment process will apply to IGT sites. KA added that the Modification's second Workgroup will be at the UNC Distribution meeting in June and will update the Workgroup when the Modification's legal text is available. CG asked KA if the Modification is setting out to expand the AQ validation criteria in the business rules. KA confirmed this is correct. CG added that the IGT UNC already refers to these validation criteria as a whole and would likely not require any changes.
- <u>0871 Facilitating IGTs with NTS Entry.</u> NK informed the Workgroup that National Gas
 Transmission had presented some proposals at the previous UNC Transmission Workgroup.
 They added that the proposed Modification seems to be similar to <u>UNC 0842</u> and <u>IGT172</u> in
 terms of having the measurement at the point of entry to the IGT, although they noted the
 Modification is still in early stages of development.
- <u>0864 Update of UNC Code Communication Methods</u>. CG informed the Workgroup that
 they are working on an IGT UNC equivalent Modification but added that the Ofcom deadline
 for fax becoming obsolete has been extended from the original date of December 2025 to
 January 2027.

Live Review Groups

0879 – Review of current Supply Meter Point Classes (Class 1,2,3 and 4). TL noted that
this Review Group had been established in May and will be considered by the UNC Panel in
June.

IGT UNC Equivalent Modifications

• 0843 – Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert – KA informed the Workgroup that a UNC Workgroup for this Modification is yet to be arranged, however could be scheduled for either the end of June or beginning of July and encouraged IGT attendance. CG added that the discussions in the previous 0843 workgroup centred on adding obligations on IGTs to the UNC and that further discussion is expected at this upcoming meeting. CG added that a three-month extension for the Modification will be discussed at the UNC June Panel meeting. KA added that a new version of the draft legal text for the Modification will be published prior to the next Workgroup.



CG asked about an update on the IGT UNC equivalent Modification, IGT165. TL responded that the Proposer is waiting on the legal text for UNC 0843 to be finalised before further discussion can take place on IGT165. They added that the Proposer has encouraged IGTs to attend the UNC 0843 workgroup meetings as this is where the main discussion on the Modification is currently taking place.

7. IGT UNC Known Issues Register

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

<u>AOB</u>

8. Draft IGT Average NEXA AQ Value Table 2024

The Chair presented the draft IGT average NEXA AQ Value table to the Workgroup. No comments were received from the Workgroup. The Workgroup unanimously agreed to recommend the draft IGT average NEXA AQ Value table to the IGT UNC Modification Panel in July 2024. TL added that once it is ratified, the tables will be available on the IGT UNC website, but will only be included in the February 2025 release.

9. Authority Update

MB informed the Workgroup that the first Modification Process Workgroup (MPW) session took place on 14th May 2024. This session focussed on two areas that Ofgem sought views on in their recent consultation: the code objectives, and the role of stakeholders in delivering strategic change. The MPW explored how a possible Net Zero code objective could impact the Code Modification process, the benefits and downsides of Ofgem producing associated guidance, and more broadly, opportunities for closer alignment of objectives between the codes. The group also discussed the nature of information Code Managers might need from Code Parties to effectively develop and deliver strategic change, circumstances where that information may need to be requested, and the challenges with framing any licence or code obligation on this.

MB added that session 2 of the Modification Process Workgroup (MPW) took place on 23rd May 2024. It explored the future role of Stakeholder Advisory Forums (SAF) in the Modification process as well as how the Code Manager and SAF could work together. There was a discussion on how SAF members could potentially be appointed. The second part of the workgroup looked at roles in the Modification process, including who should be able to raise a Modification Proposal and alternative Modifications, and if the principle of proposer ownership needs to evolve.

MB informed the Workgroup that having considered guidance from government, Ofgem will not be issuing decisions on Code Modifications during this period, prior to the General Election on 4th July 2024. However, exceptions may be made on a case-by-case basis where there is a specific need to issue the decision. Ofgem will notify you prior to issuing any such decisions.



MB added that Ofgem will also not be updating and publishing expected decision dates for Code Modifications for decision. These will be reset and published accordingly post General Election. Please note that Ofgem will continue to attend code Panel meetings during the pre-election period but may be unable to comment or answer any questions on policy issues impacting Code Modifications.

MB added that in light of the pre-election period, the MPW sessions scheduled for June will be rearranged.

The next Workgroup meeting is scheduled for Thursday 11th July 2024





Annex 1 – Actions Table

| Reference | Action | Owner | Status |
|------------|--|-----------------------|--|
| 24/04 - 03 | Code Administrator to contact REC and SEC Code Managers to determine which governance framework ASN files fall under | Code Administrator | Closed |
| 24/04 - 04 | IGTs and Shippers to provide information to E.ON UK on potential scenarios and timings for IGT173 testing period | IGTs and Shippers | Carried Forward to 24-07 Workgroup |
| 24/05 - 01 | Code Administrator to review the IGT UNC and UNC 0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers to determine whether the IGT UNC rules on terminated users require further review. | Code Administrator | Closed |
| 24/06 - 01 | Code Administrator to update E.ON UK of the discussions around the proposed IGT173 testing period from the IGT UNC June Workgroup. | Code Administrator | Open |
| 24/06 - 02 | Charlotte Gilbert to review the suggested modifications to the UNC Code proposed by the Statutory consultation - establishing the Independent System Operator and Planner (ISOP) in GB industry codes 2024 | CG | Open |