

IGT UNC 24-07 Modification Workstream Meeting

Final Minutes

Thursday 11th July 2024 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Ashley Foster	AF	SSE	
Charlotte Gilbert	CG	BUUK	
Cher Harris	CH	Indigo Pipelines	
Eilidh McNally	EM	Last Mile Gas	
Kathryn Adeseye	KA	Xoserve	CDSP
Kirsty Dudley	KD	E.ON UK	
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 no apologies were received.

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. NK added Item 9 – UNC 0871 and 0871A, MB added Item 10 – Authority Update, the Chair added items 11 - Andrew Eisenberg's Resignation from IGT UNC Panel and 12 – UK Link Replacement and CG added item 13 – Xoserve Equitable Review.

3. Approval of the Previous Minutes 24-06

HF informed the Workgroup that no comments were received for the draft 24-06 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

TL informed the Workgroup that there were 3 outstanding actions as follows:

- **24/04 – 04: IGTs and Shippers to provide information to E.ON UK on potential scenarios and timings for IGT173 testing period.** The Chair and KD agreed to cover this action as part of Item 6 – IGT173 Testing Approach. Action 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.** HF apologised to KD that E.ON had not been sent an extract of the discussions from the previous Workgroup meeting, adding that this would have been extracted directly from meeting minutes. KD responded that they were happy for the action to be closed, adding that they had based the IGT173 testing papers for the Workgroup on what had been sent previously as part of **Action 24/04 – 01** rather than the discussions from the last Workgroup. Action closed.
- **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.** The Chair and CG agreed to cover this action as part of Item 5 – ISOP Discussion. Action closed.

Matters Arising

5. Statutory consultation - establishing the Independent System Operator and Planner (ISOP) in GB industry codes 2024 – Identifying possible impacts on the IGT UNC

CG presented their findings of the proposed UNC changes resulting from the ISOP and the potential impacts upon the IGT UNC. They added that the ISOP introduces two new sections relating to Advisory and Information Requests and International Security. There are also new provisions that allow the ISOP to have the ability to raise Modifications to the UNC, attend meetings and be updated on Code proposals. CG added that they are unsure if these provisions will be required under the IGT UNC, so they have focussed on the data requests side of the changes. They added that these changes may be necessary later so consideration could be given as introducing these provisions would provide a way of future proofing.

CG added that following discussions with Ofgem, if data requests at a Supply Point level are required, then the IGT UNC will need to make similar changes to the UNC to enable the CDSP/Xoserve to provide that data, as the transfer of data under the UNC does not cover IGTs in the list of parties. CG added that if this information is not required, there is a likelihood that the IGT UNC will only need a Modification to introduce some housekeeping amendments that will definitely be required.

The Chair added that Ofgem will approach the National Energy System Operator (NESO) to gain a better understanding of what data requirements for IGTs are likely in the future, which Ofgem will feed back to the Code Administrator. They added that depending on the outcomes of discussions with NESO, there may be Modifications required to facilitate the ISOP in data requests and becoming a party to the IGT UNC.

The Chair added that the changes in the UNC will be implemented by Ofgem using their powers from the Energy Act 2023, with a consultation on these changes having recently closed. They encouraged the Workgroup to look at the consultation to further understand the implications of ISOP. The Chair added that the aim is for any required IGT UNC Modification to marry up with the Implementation Date of required UNC changes directed under the Energy Act.

The Chair asked KA if Xoserve feel they have the current permissions within the governance of the IGT UNC to accommodate the potential data requests for ISOP. KA responded that it sounded like changes will be needed but will check with David Addison (DA) to further understand the current data permissions. The Chair thanked KA and asked if DA would be able to attend a future Workgroup to feedback this information. KA responded that they would invite DA to the next meeting.

Modification Business

6. IGT173 – Gateway delivery for RPC Data

KD presented [overview slides](#) to the Workgroup for their view of the testing approach to IGT173.

MIB added that Energy Assets would be keen to take part in the testing period. KD thanked MIB. They added that further details will be ironed out regarding the testing approach in the August Workgroup meeting.

CG added that following internal discussions, they hoped to do the testing on the September billing run, due on 2nd October, in a parallel run with the old process. MIB added that this would suit Energy Assets too. KD responded that they believed the IX will be available from early October though it may not be ready for the 2nd. KD and KA added that they will have to double check for an updated time frame and would feed back the preference for the 2nd.

24/07 – 01: KD to find out when the start of the testing window is for IGT173 and feedback preference for 2nd October

CG advised that they planned on using dummy data in their testing runs to ensure data confidentiality and asked for confirmation that this would be suitable. KD responded that it would be fine, they hadn't specified the content to be used in the testing runs and referenced a note on slide 4 relating to the naming of test files.

CG asked if the IX will notify IGTs and Shippers if the file has been sent or received. KA responded that the IGTs will receive a delivery receipt if the file has been sent successfully or an alert that it did not send, and the IGT could check the error directory. KA added that this will only happen if the correct naming convention is not used.

KD took the Workgroup through the [Testing Log](#) for IGT173, which lists the potential testing scenarios for parties.

LG indicated their understanding that if the testing goes well, the expectation is that the IX will be implemented as part of the November 2024 Release, and if there are some issues it will be pushed back to the February 2025 Release. KD confirmed this, adding that if recommended by the Workgroup following the testing period, the Modification will go to Panel for voting regarding implementation in the November 2024 Release. The Chair asked KA how much notice the CDSP would need regarding the Panel decision before a potential November Release. KA responded that it would be more for those involved in the DSC Change process, but likely as soon as possible. The

Chair noted that the IGT UNC Panel are due to meet on 25th October, right at the end of the suggested testing period.

LG asked if a November change pack is issued out to the whole industry. KD asked if this is related to the Umbrella XRN. LG confirmed this. KD responded that this change pack will be sent out as part of the standard process changes.

KA asked the Workgroup about their concerns for testing and using the IX in general, adding that this is used by DSC customers all the time. CG responded that it is more to do with making sure everyone is trained up on using it, especially if they haven't used it before. KD added that although the IX has been successfully implemented before, it will be new to different teams and colleagues.

CG asked if there will be any issues with the IX ahead of the transition to the Cloud. KD responded that they have not foreseen any issues, but added that it could be looked at during the Testing run to see if there are any problems.

The Chair suggested that parties should take some time to consider the Testing Log. KD added that they are happy to receive feedback, noting that it is unusual to do this kind of testing pre-implementation. The Chair asked the Workgroup if they would like to discuss this further at the August Workgroup meeting. CG responded that it would be good to discuss it then. KD added that hopefully after the next Workgroup, they will be able to take a Straw Man regarding testing to Panel for approval.

7. Cross Code Modification Implications Tracker

TL provided the Workgroup with the following updates:

Watch List

- **0878 - Use of Entry Capacity Holdings at Easington at the Rough Storage ASEP in Winter 2024/2025.** Not expected to impact the IGT UNC.
- **0880 - Amendment to Wobbe Index upper limit in the Network Entry Agreement at the York Entry Point.** Not expected to impact the IGT UNC.
- **0881 - Review and consolidation of UNC Transition Document TDIIIC - Transitional Rules.** Potential impact if there are changes to cross-references to the UNC Transition Document
- **0882 - Transparency of non-standard Gas Quality parameters at new entry connections to the NTS.** Potential impact if there are changes to cross-references to UNC Section V. Could also impact the connected sites for IGTs.
- **0883 - Update to the Annual Quantity (AQ) amendment process for Erroneous Domestic AQs.** IGTs expected to be impacted as updates made to the AQ amendments process will apply to IGT and DNO sites. If only Section G2.3.21 is amended, there is no

direct Code impact as a result of wider cross referencing. If further amendments are made, the Code Administrator will re-review. The Chair asked LG for clarification as the proposer for this Modification. LG responded that the IGT UNC points to UNC Section G in general. TL added that the IGT UNC does not specifically refer to the paragraph in question. If no further changes are made, this Modification will be automatically implemented into the IGT UNC via the general cross reference.

- **0884 - Extending the PC4 Read Submission Window.** There are proposed changes to TPD Section M, 5.9. TL noted that the IGT UNC make several references to this section and paragraph in particular. Also, IGTs will be affected by any change to the submission window. LG added that in [IGT159 – Amendments to the Must Read Process](#), there were changes made based on the submission window, but advised that they do not intend to amend the Must Read process so this should not be impacted.
- **0885 - Amendment to Gas Quality NTS Entry Specification at the St Fergus SAGE System Entry Point.** Not expected to impact the IGT UNC.
- **0886 - Amend the Code Cut-Off Date to a Rolling 3-Year Period.** The Chair suggested that the UNC charging for IGT sites will be affected, so it will be needed in the IGT UNC for transportation charging purposes. TL noted that the Modification will be considered by UNC Panel in July.
- **0877 - Alignment of TO Revenue and TO Revenue Adjustment terms to the current Gas Transporter Licence.** Not expected to impact the IGT UNC. This Modification was implemented on 12th June.

IGT UNC Impact Assessments

- **0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers.** The Chair suggested that the GTs have raised this Modification so they can take action on a sanctioned Shipper. The Chair added that a potential IGT UNC equivalent Modification will likely be raised by an IGT wanting to take similar action, but queried whether this action would automatically happen in the IGT UNC, noting that a sanctioned Shipper would not be able to get gas onto an IGT network. They added that they are unsure if anything needs to be added in the IGT UNC but asked IGTs for feedback on whether they wish to mitigate their risks suggesting that they would need to raise the Modification if this is the case.

CH asked if the IGT UNC would point to the proposed legal text changes in the UNC. The Chair confirmed that it does not point to it. The Chair added that if a Shipper is sanctioned, do the IGTs want to also formally suspend business with that Shipper. They added that although

no gas from that Shipper will make it to an IGT network, provisions may need to be made for any downstream Supply Points that Shipper was responsible for.

KA asked what currently happens if a user is discontinued or terminated, noting that UNC0854 is modelled on the existing processes. The Chair responded that the Supplier has to have a deed of undertakings stating that they will pay for the gas used by customers in absence of the Shipper. The Chair added that UNC 0854 will allow the GTs to take action earlier on the Shipper and invoke this deed of undertakings, but the IGTs would not have the same facility without an equivalent Modification.

CH asked if there is anything in the UNC that prohibits the IGTs from invoking the deed onto the Supplier, and whether anything is explicitly needed in the IGT UNC to cover this scenario. The Chair responded that the Code Administrator would look into the matter further.

24/07 – 02: The Code Administrator to review the impacts for the IGT UNC if a Shipper is suspended from operating under the UNC relating to UNC0854

KA added that throughout the development of UNC 0854, the intention had been for it to apply to both GTs and IGTs, but these discussions have suggested it will not be as easy as the IGTs piggybacking off the Modification. The Chair responded that the IGTs will need to raise a Modification if they want the extra protection and added that a sponsor will be required. MIB suggested that Energy Assets would be happy to sponsor the Modification. The Chair thanked MIB.

IGT UNC Equivalent Modifications

- **0843 - Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert.** Legal text is expected to be brought to the next Workgroup meeting for this Modification. The Chair added that David Morley will bring back [IGT165](#) to the Workgroup when this legal text is available.

8. IGT UNC Known Issues Register

TL provided the Workgroup with an overview of 1 new issue added to the Issues Register as follows:

- There are housekeeping corrections required to amend references in the IGT Non-Domestic New Connections Ancillary Document from PS1 and PS2 to PSA and PSB. CG added that they had noticed some further referencing issues that need updating in the IGT UNC. The Chair encouraged the Workgroup to raise any such issues found to the Code Administrator. TL suggested that a fast-track housekeeping Modification could be raised later this year to tackle remaining reference errors in one go.

AOB

9. UNC 0871 and 0871A

NK informed the Workgroup that they had attended the recent UNC Transmission Workgroup meeting where [UNC 0871 – Facilitating IGTs with NTS Entry](#) was discussed and they were in discussions with National Gas Transmission (NGT) regarding [UNC 0871A - Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS](#) prior to a proposal being formally raised. TL informed the Workgroup that UNC 0871A had been formally proposed as an alternate solution to UNC 0871. They added that the UNC Panel ultimately decide which of the two solutions to recommend to Ofgem for implementation. The Chair added that UNC 0871A has a different title to UNC 0871 and the UNC Panel will first need to determine whether it is an alternate solution, and if it is the Transmission Workgroup will need to develop it alongside UNC 0871.

The Chair and TL noted that there were a lot of differences between the proposals of UNC 0871 and UNC 0871A, including that the proposer for UNC 0871 had pushed for self-governance, whereas 0871A was proposing an Authority decision. KA added that the CDSP has not completed an Impact Assessment or Rough Order of Magnitude (ROM) yet for UNC 0871 so the impacts on Gemini are not known.

TL informed the Workgroup that interested parties should compare the two solutions by reading through the Workgroup Report from UNC 0871 and the Modification Proposal for UNC 0871A.

NK informed the Workgroup of some of the discussions held with NGT regarding the development of UNC 0871A. They added that they are assisting NGT with this development, with [IGT172 – Provision for Gas Entry within the IGT UNC](#) referenced within the draft legal text for the Modification.

The Chair asked NK why an alternative to UNC 0871 was being sought and whether UNC 0871A is an alternative solution or building further on UNC 0871. NK responded that the core of the two solutions are the same but there are key differences, some of which have already been mentioned.

The Chair noted that IGT172 and the UNC equivalent modification [0842 - Gas Entry onto the Total system via an Independent Gas Transporter](#) are awaiting approval from Ofgem and asked NK whether UNC 0871 and 0871A are reliant on these Modifications being approved, then the existing models deemed fit for purpose for Distribution can then be extended to include Transmission. NK responded that while it would be helpful for Modification development if UNC 0842 and IGT172 are approved, it is not necessary as these Modifications do not have any impact on Transmission, and the UNC could potentially look at alternative solutions, including the use of ancillary agreements.

MB added that they cannot provide an Expected Decision Date for IGT172 or UNC 0842 yet, but Ofgem's 'minded to' approve decision remains the same.

The Chair noted that whatever solution is adopted, there will be a cross-code impact on the IGT UNC and a Modification will need to be raised. They added that a marrying Modification will be required and a proposer is needed, noting that NGT cannot raise a Modification to the IGT UNC. They added that any IGTs looking to facilitate gas entry through this Modification may need to consider this. NK

added that as part of their work assisting NGT with UNC 0871A that they will be hoping to reduce the work required for the IGT UNC.

10. Authority Update

MB provided the Workgroup with the following updates:

To inform their approach to development of the strategic direction statement (SDS) Ofgem will be holding two workshops that will be open to code panels to attend. Invitations have been sent to the secretariat to be forwarded on to panel members. These workshops will take place on 31st July and 6th August. If you haven't RSVP yet, Ofgem would be grateful if you could confirm attendance by emailing industrycodes@ofgem.gov.uk

Ofgem has commenced publishing again and are in the process of confirming new expected decision dates for code modifications with the Authority for decision. This is part of an Ofgem-wide strategic review of all publications.

Ofgem will look to communicate these EDDs where possible at code panel meetings, however for the time being they will not be publishing an updated EDD register on our website. This is because organisational priorities may change in light of the new government coming in to power, and Ofgem are therefore not in a position to confirm expected decision dates for all code modifications currently with them.

11. Andrew Eisenberg Resignation from IGT UNC Panel

The Chair informed the Workgroup that Andrew Eisenberg has resigned from the IGT UNC Panel effective from the July Panel meeting. They added that there are now two Shipper representative vacancies if anyone would like to come forward, and urged attendees to reach out to any interested parties. The Chair added that Panel will no longer be quorate, meaning that meetings will have to be held and then reconvened. CG suggested that this should be added to the Known Issues Register.

24/07 – 03: Code Administrator to add issue of quoracy in IGT UNC Panel to the Known Issues Register

12. UK Link Replacement

The Chair informed the Workgroup that the UK Link Replacement project is now starting, adding that the project is called Trident and the replacement will happen between 2027 and 2030. They added that there are likely to be impacts on the IGT UNC.

CG added that Xoserve are holding a Trident project Workshop on 9th September to further engage with stakeholders. The Chair added that they will encourage Xoserve to provide updates as this project progresses, along with further opportunities for IGT UNC parties to express their views.

13. Xoserve Equitable Review

CG informed the Workgroup that Xoserve are undertaking an Equitable Review that is looking at overhauling their service lines. CG added that they have asked for it to be raised to the IGT Constituency once the first review has come out, or potentially at a future Workgroup meeting so that the IGTs can review the Equitable Review.

The next Workgroup meeting is scheduled for Thursday 8th August 2024.

Annex 1 – Actions Table

Reference	Action	Owner	Status
24/04 - 04	<i>IGTs and Shippers to provide information to E.ON UK on potential scenarios and timings for IGT173 testing period</i>	<i>IGTs and Shippers</i>	<i>Closed</i>
24/06 - 01	<i>Code Administrator to update E.ON UK of the discussions around the proposed IGT173 testing period from the IGT UNC June Workgroup.</i>	<i>Code Administrator</i>	<i>Closed</i>
24/06 - 02	<i>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</i>	<i>CG</i>	<i>Closed</i>
24/07 - 01	KD to find out when the start of the testing window is for IGT173	KD	Open
24/07 - 02	The Code Administrator to review the impacts for the IGT UNC if a Shipper is suspended from operating under the UNC relating to UNC 0854	Code Administrator	Open
24/07 - 03	Code Administrator to add issue of quoracy in IGT UNC Panel to the Known Issues Register	Code Administrator	Open