

IGT UNC 24-08 Modification Workstream Meeting

Draft Minutes

Thursday 8th August 2024 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Ashley Foster	AF	Indigo Pipelines	Present for Item 5
Cher Harris	CH	Indigo Pipelines	
David Addison	DA	CDSP	Present for Items 6 and 7
Eilidh McNally	EIM	Last Mile Gas	
Erin McFeeley	ERM	Last Mile Gas	
Ellie Osobina	EO	Ofgem	
Josie Lewis	JL	CDSP	
Kirsty Dudley	KD	E.ON UK	
Matthew Brown	MB	Ofgem	
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 Michelle Brown (Energy Assets) and Nick King (NK) (CNG).

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. MB added Item 9 – Ofgem Representative.

3. Approval of the Previous Minutes 24-07

CA informed the Workgroup that no comments were received for the draft 24-07 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 three outstanding actions as follows:

- 24/07 – 01: KD to find out when the start of the testing window is for IGT173.** KD informed the Workgroup that Xoserve are aiming for a testing window of 1st-18th October, to allow IGTs to simulate the live running with the September billing runs, which was requested in the last Workgroup. Action closed.

- **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.** DA presented [slides](#) to the Workgroup on the impacts on the IGT UNC from UNC 0854, under Item 7 - Cross Code Modification Implications Tracker. Action closed.
- **24/07 – 03: Code Administrator to add issue of quoracy in IGT UNC Panel to the Known Issues Register.** TL informed the Workgroup that the issue of quoracy had been added to the Known Issues Register. Action closed.

MODIFICATIONS

5. IGT173 – Gateway Delivery for RPC Data

KD presented [overview slides](#) to the Workgroup for their view of the testing approach to IGT173, updated with feedback received at the July Workgroup meeting and other comments prior to the August meeting.

KD went through some of the amended testing considerations, including the testing window of 1st-18th October to align with the IGTs' September billing runs, regular check-in calls, using the [Testing Log](#) to capture evidence and including a test on the 5pm cut off on the 5th business day rule.

KD asked the Workgroup for any further testing scenarios that parties would like to include. CH responded that they would like to test as close to the live rules as possible, including replicating the actual file sizes for the dummy data. KD advised that they would add this to the Testing Log and encouraged attendees to add any further suggestions.

The Chair asked if IGT173 testing had been raised and discussed in the DSC. KD responded that the discussions for the testing are being led at the IGT UNC Workgroup. They added that they had attended the DSG recently and encouraged any interested parties to attend the Workgroup.

KD suggested that once the IGT173 testing scenarios have been finalised, they would submit a paper with the confirmed testing scenarios to IGT UNC Panel at the August meeting. The Chair responded that they would be happy to accept the paper and ask Panel members for comments, potentially offline if the August Panel meeting is cancelled.

KD advised that testing participants would pull together a formal recommendation to Panel in the final check-in call, ahead of the planned implementation in early November. The Chair asked whether KD has considered the timings of the testing window with the October Panel meeting. KD responded that they should be able to submit a paper in time, depending on when the testing period is ended by the participants. The Chair asked whether there would be time to submit a paper to the October Workgroup meeting and suggested that KD provide a status report as the October Workgroup meeting is set to fall during the testing window. KD agreed.

KD asked the Workgroup about the use of dummy data in the testing scenarios. CH responded that it would be beneficial to test a version of live files, adapted slightly for testing purposes and asked about

the naming of these files. KD referred to a note on Slide 5 which states that any files used for testing purposes should use TN rather than PN. KD suggested that individual IGTs can determine the population of their testing files, using either live or dummy data.

KD asked the Workgroup about the retention of test data, adding that there were no rules specified in the Modification and that parties will have their own data retention policies, and so they can dictate what they do with the test data. CH agreed.

KD advised that having held discussions with the CDSP, there is a plan to provide communications on the testing window to the industry, to potentially allow other Shippers to volunteer at the last minute, and asked IGTs for a suitable cut off time for allowing any more testing participants. CH suggested a week prior to testing would be a sensible cut off date.

CH asked if the smaller Shippers have been engaged at all, and if they are aware of the Modification or testing period. KD responded that they were aware of this issue, and industry communications had already been discussed at the DSG. TL suggested that the Joint Office could be asked to send an email out to its mailing list, to try and reach the non-engaged Shippers. KD suggested that IGTs could add a comment in future invoices that 'from the November billing run onwards, Shippers will receive the RPC backing data via the IX portal'. CH agreed.

KD added that updated versions of the Testing Overview slides and Testing Log would be made available on the [IGT UNC website](#) next week, with comments from this meeting included.

MATTERS ARISING

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

TL provided the Workgroup with an update on the ISOP consultation. They added that the Code Administrator and BUUK had attended a meeting with Ofgem, where Charlotte Gilbert (BUUK) presented their findings of potential IGT UNC impacts arising from the proposed UNC changes in the ISOP consultation. TL added that one of the main concerns had been over the data permissions required by the ISOP, in particular supply-point level data from IGTs. They added that should this level of data be required, a IGT UNC Modification would be required, and this was discussed with Ofgem. TL added that Ofgem have taken this away to look into the data requirements for IGTs, and CG will provide an update at a future meeting once Ofgem have responded.

MB added that Ofgem intend to make public the implementation date of the ISOP in due course and added that this date should provide sufficient time for any necessary IGT UNC modifications to be implemented on the same date.

DA added that the data currently provided to NESO (National Energy System Operator) is aggregated and not individual meter point level. They added that they would have to contact Ofgem about the

data requirements, particularly if there is anything required over and above the existing information provided by Xoserve.

The Chair asked DA about the IGT UNC needing to mirror the data permissions in the UNC Modification(s) that arises from the ISOP consultation. DA responded that any extra data requirements would likely have to go through the DSC and be recorded in the Data Permissions Matrix. They added that additional processes will probably need to be adopted if individual meter point level data is required by the ISOP. The Chair noted that the UNC Modification is likely to be implemented by Ofgem using their powers under the Energy Act 2023, so will not follow the normal Modification process. DA responded that they would have to take a further look at the proposed changes and speak internally with colleagues, adding that this is likely needed to be raised to the DSC Contract Management Committee.

7. Cross Code Modification Implications Tracker

TL provided the Workgroup with the following updates:

Watch List

- [0887 - Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS:](#)** This Modification was raised as an alternative to [0871 - Facilitating IGTs with NTS Entry](#), but the UNC Panel voted to raise a separate Modification in July. Both UNC 0887 and UNC 0871 will continue to be developed and will be sent to Ofgem for Authority Decision. It is likely to impact the IGT UNC and IGTs and seeks to clarify the treatment of energy entering the NTS after entering an IGT network. NK had attended the UNC Transmission Workgroup in August and said there wasn't enough clarity to determine an IGT impact yet.

DA added that they had also attended the workgroup and provided some insight into the differences between the two modifications. They advised that when producing the Rough Order of Magnitude for UNC 0871, the CDSP had needed to include several assumptions which were not in the Modification Solution, with a number of these assumptions answered in UNC 0887. DA added that in UNC 0871, the proposal is to create an entry point that happens to be on an IGT site, but not to pay NTS entry or to reserve NTS entry as the potential volumes would be considered negligible in the Total System. They added that their understanding of UNC 0887 was there was more detail of how gas would exit from the IGT system into the NTS system. TL agreed.
- [0886 - Amend the Code Cut-Off Date to a Rolling 3-Year Period:](#)** This Modification has now been assigned to the UNC Distribution Workgroup, with an aim for UNC Panel in February 2025 for a first report. It is likely to apply to IGT supply points as the code cut-off date/line in the sand applies to them. The Chair suggested that Xoserve would be expecting an equivalent IGT UNC modification. DA confirmed this. TL added that they will continue to attend Workgroups to watch the development of UNC 0886, particularly whether a IGT UNC Modification will be needed or whether it will be automatically adopted.

- [0877 - Alignment of TO Revenue and TO Revenue Adjustment terms to the current Gas Transporter Licence](#): This Modification was implemented on 12th July 2024. There were no IGT UNC impacts.

TL noted that there have been several extensions in terms of reports to the UNC Panel for some UNC Modifications.

IGT UNC Equivalent Modifications

- [0842 - Gas Entry onto the Total system via an Independent Gas Transporter](#): This Modification was approved by Ofgem, along with the IGT UNC equivalent Modification [IGT172 - Provision for Gas Entry within the IGT UNC](#). Both Modifications are due to be implemented in an extraordinary Code release on Monday 12th August.

IGT UNC Impact Assessment

- [0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#). DA presented [slides](#) to the Workgroup on the impacts on the IGT UNC from UNC 0854

DA provided a background on UNC 0854, which was implemented on 10th May 2024. They added that existing processes applied to Terminated Users will now apply to Sanctioned Users, and the CDSP would receive an instruction from National Gas Transmission to invoke the Supplier Deed of Undertaking (DoU). DA noted that the CDSP expects this to apply to all Gas Transporter sites, including IGTs.

DA added that assuming a Modification is raised in the IGT UNC, the CDSP would like to gain permission to follow these processes whilst the Modification is in development, such as invoking the DoU. They added that the CDSP believe the DoU is the right thing to apply in such circumstances, due to the protection given to consumers. DA added that they would share this approach with DSC committees and the IGT UNC Panel so that they were satisfied the appropriate actions were being taken whilst a potential Modification is in development.

DA asked attendees for any comments. CH responded that the DoU being invoked in the situation of a Terminated Shipper and reverting to the Supplier is a tried-and-tested process, but asked what would happen if the Shipper and Supplier are the same organisation. KD queried whether there was governance within the REC to suspend a Supplier from being a Supplier of Last Resort. The Chair replied that they did not believe there was. KD added that the Shipper and Supplier would be independent roles, even under the same organisation, and there is no certainty that if the Shipper is unable to pay that the Supplier would also be unable. DA added that likely the Supplier of Last Resort process would have to be invoked for a Sanctioned Supplier.

The Chair added that their understanding is that IGTs would not be able to invoke the DoU for a Sanctioned Shipper as UNC 0854 only provides permissions for GTs to use the DoU in these circumstances. CH responded that if it is a case of extending the scenarios for using DoU, then the current provisions for the DoU in the IGT UNC and other legal texts need to be checked to see what amendments are needed, if any. The Chair agreed.

The Chair added that an action is needed on the IGTs to consider the implications of UNC 0854 and determine whether they are legally covered in the event of a Shipper being suspended. They added that if the IGTs should then be able to determine whether a change will be required in the IGT UNC, and what a potential Modification would encompass. The Chair asked IGT representatives if they were happy to accept the action. CH agreed.

24/08 – 01: IGTs to consider the impacts of UNC 0854 and determine whether a IGT UNC Modification is required to provide them with sufficient legal protection.

KD asked if the current drafting for the DoU will be changed to capture any new scenarios arising from UNC 0854. DA responded that they were not sure but imagined that this would have been considered in the development of UNC 0854.

DA asked what would happen in the short term in the case of a Sanctioned Shipper. The Chair responded that their understanding is that DNs are able to charge Suppliers for the gas through the UNC but that the IGTs cannot. They added that through the DoU, the Supplier will be asked to put gas into the Network on behalf of the IGTs, but the IGT is only legally able to continue billing the Shipper. The Chair added that IGTs will need to check the legal texts to confirm this, and what changes need to be made to ensure the IGTs can get their revenue in this situation.

8. IGT UNC Known Issues Register

TL provided the Workgroup with an overview of 4 new issues added to the Issues Register as follows:

- The issue of non-quoracy at the IGT UNC Panel from the August meeting onwards has been added in line with Action **24/07 – 03**. There will be regular notices to the industry to remind of the two vacant Shipper spots.
- There have been 3 housekeeping corrections raised by Charlotte Gilbert (BUUK) which were found during their analysis of the IGT UNC and the proposed UNC changes resulting from the ISOP.

AOB

9. Ofgem Representative

MB informed the Workgroup that this would be their final IGT UNC Workgroup meeting and Ellie Osobina would be replacing them from September as the Ofgem representative at IGT UNC meetings. The Workgroup thanked Matthew and welcomed Ellie.

The next Workgroup meeting is scheduled for Thursday 12th September 2024.

Annex 1 – Actions Table

Reference	Action	Owner	Status
24/07 - 01	<i>KD to find out when the start of the testing window is for IGT173</i>	<i>KD</i>	<i>Closed</i>
24/07 - 02	<i>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</i>	<i>Code Administrator</i>	<i>Closed</i>
24/07 - 03	<i>Code Administrator to add issue of quoracy in IGT UNC Panel to the Known Issues Register</i>	<i>Code Administrator</i>	<i>Closed</i>
24/08 - 04	<i>IGTs to consider the impacts of UNC 0854 and determine whether a IGT UNC Modification is required to provide them with sufficient legal protection.</i>	<i>IGTs</i>	<i>Open</i>