

IGT UNC 24-09 Modification Workstream Meeting

Final Minutes

Thursday 12th September 2024 via Teleconference

Attendee	Initial	Organisation	Notes
Anne Jackson	AJ	Gemserv	Chair
Ashley Foster	AF	Indigo Pipelines	
Charlotte Gilbert	CG	BUUK	
Eilidh McNally	EIM	Last Mile Gas	
Erin McFeeley	ERM	Last Mile Gas	
Kathryn Adeseye	KA	CDSP	
Lee Greenwood	LG	Centrica	
Michelle Brown	MB	Energy Assets	
Natasha Perry	NP	BUUK	
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 Matthew Brown (MB) from Ofgem.

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 9 – Project Trident and TL added item 10 – Authority Update

3. Approval of the Previous Minutes 24-08

The Chair informed the Workgroup that no comments were received for the draft 24-08 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 was 1 outstanding action as follows:

- **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.** The Chair asked if the present IGT representatives had considered the impact of [UNC 0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#) and determined whether a Modification is required. CG, AF and MB all responded that a

Modification will be required. The Chair asked if any of the attendees would be willing to sponsor this Modification. MB responded that they would be happy to sponsor. The Chair thanked MB and suggested that it may be worthwhile for MB to discuss this Modification with all the IGTs at an Independent Networks Association (INA) meeting. MB agreed.

KA added that they had looked into the question raised at the August IGT UNC Workgroup meeting regarding what happens if a sanctioned Shipper and Supplier are the same entity. They added that the first step would be to invoke the Deed of Undertaking on the Supplier, and the Supplier would have two days to put security in place. This would not happen as the Supplier is sanctioned and Transporters would report to Ofgem that the Supplier is not adhering to the Deed of Undertaking and in breach of their Supplier license. KA added that National Gas Transmission will have to balance that part of the portfolio in the interim and Ofgem would appoint a Supplier of Last Resort. The Chair thanked KA for this information.

Action closed.

MATTERS ARISING

5. Statutory consultation - establishing the Independent System Operator and Planner (ISOP) in GB industry codes 2024 – Ofgem’s Response to Consultation

The Chair informed the Workgroup that on 29 August 2024, Ofgem published their [response to the statutory consultation](#) which referenced Modifications to industry Codes to support the ISOP implementation. The Chair noted that the IGT UNC was not mentioned in the response.

The Code Administrator and BUUK had met with Ofgem previously to discuss the potential impacts of the ISOP on the IGT UNC. CG added that they had not received an update from Ofgem yet following this meeting, and noted that the Ofgem representative from that meeting, Carly Malcolm, was currently on leave. They added that the Joint Office had sent out an email earlier in the week advising that no further Implementation Dates for Modifications can be instructed until Day 1 of the new ISOP provisions coming into effect. CG added that the Joint Office had not received confirmation of the Day 1 date, but were planning around the anticipation that it will be in early October 2024. KA added that one of the Modifications they had worked on, [UNC 0873 - Allow specific roll-over for the AUG Table 2025/26](#), has been implemented as of 09 September 2024, but the updating of Code has been delayed due to the pending implementation of the ISOP Modification, and the significant changes to the UNC Code because of it.

The Chair advised that the Code Administrator would follow up with Ofgem about confirming the Day 1 date for the ISOP implementation. They added that Ofgem have been sufficiently informed of the risks of the IGT UNC not having equivalent Modification(s) prepared for this date. They suggested that work could begin on the equivalent IGT UNC Modification and would discuss further offline with CG, who will act as Proposer. CG agreed.

Post Meeting Note: IGT UNC have now received confirmation from Ofgem that Day 1 will be 1st October 2024.

6. Must Read Invoicing

LG advised the Workgroup of their expectations around Must Read Invoicing. LG added that Centrica have been receiving invoices from some IGTs with no backing data. LG informed the IGT representatives present that their expectations were that invoices would be sent with backing data, including MPRN's. AF and ERM confirmed that Indigo Pipelines and Last Mile Gas provide backing data with invoices. CG and MB added that they were unable to confirm this during the meeting but would pick it up with LG offline. LG thanked the IGT representatives for their responses and added that the consensus appeared to be that backing data should be provided along with invoices. The Chair requested that the IGTs take an action to respond either through the IGT UNC email, igtunc@gemserv.com, or LG's email, lee.greenwood@centrica.com.

24/09 – 01: IGTs to respond to Centrica to confirm whether backing data is sent along with Must Read invoices to Shippers

The Chair asked LG if Shippers were receiving backing data when must reads were being performed prior to the implementation of [IGT159 – Amendments to the Must Read Process](#). LG responded that it was inconsistent, and added that by raising this issue here, they hoped it would encourage a more consistent approach from IGTs.

7. Cross Code Modification Implications Tracker

TL provided the Workgroup with the following updates:

Watch List

- [0888 - Correction to the Assessment Period for Demand Side Response \(DSR\) Option Offers](#): This was a fast-tracked Modification to amend drafting errors arising from [UNC 0866 - Amendments to Demand Side Response \(DSR\) Arrangements](#) and was implemented on 09 September 2024. No expected impact to the IGT UNC.
- [0889 - Clarifying Inclusion of the Reserve Price in the System Entry Overrun Charge](#): No expected impact to the IGT UNC.
- [0890 - Update to AQ Correction Processes - Request for Adjustments \(RFA\) AQ Change](#): The clause in question is not likely to have an impact on the IGT UNC, but this Modification will remain on the watchlist as IGT UNC Parties are impacted by the AQ processes.
- [0891 - Reintroduction of the enhanced pressure service and increased MNEPOR for BBLC \(reintroduced by UNC0589 and introduced by UNC0814\)](#): No expected impact to the IGT UNC.
- [0892 - Update incorrect NTS Entry Capacity paragraph references and reintroduce Daily Auctions to Entry Overrun Charge](#): Housekeeping Modification to amend errors arising from the implementation of another Modification. No expected impact to the IGT UNC.

- [0893 - Reintroduce NTS Capacity Surrender text and update TPD B2.12](#): Housekeeping Modification to amend errors arising from the implementation of another Modification. No expected impact to the IGT UNC.
- [0894 - Facilitating Biomethane entry into the GDN by exporting methane from the GDN into the NTS via Compression](#): This Modification appears to be specific to GDNs, no expected impact to the IGT UNC.
- [0884/A - Extending the PC4 Read Submission Window](#): A change-marked version of the amended legal text has been published for this Modification, which is expected to have an impact on the IGT UNC.

IGT UNC Equivalent Modifications

- [0843 - Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert](#): At the last UNC0843 Workgroup meeting on 20 August, the revised legal drafting was discussed, there were several changes made and discussed with regards to IGT related clauses. The Code Administrator recommended that IGTs review the legal text discussed at this meeting and the meeting minutes. The Proposer was to take the legal text and framework document away following some suggestions from the Workgroup.

The next UNC0843 Workgroup meeting is scheduled for 17 September. KA added that the Proposer does not think the updated legal text will be available, which is why the planned meeting has been shortened.

The Chair added that David Morley had informed them that there were no updates at the moment for the IGT UNC equivalent Modification, [IGT165 – Independent Shrinkage Expert and Independent Shrinkage Charge](#). They added that given the recent discussions on IGT related clauses, it is likely that this Modification will be brought back to an IGT UNC Workgroup meeting in the near future.

Review Groups

- [0849 - Commercial Framework Review to Enable Hydrogen Blending](#): Report expected to go to UNC Panel on 19 September to request a six-month extension to March 2025.
- [0851 - Extending the Annually Read PC4 Supply Meter Point \(SMP\) read submission window](#): This review group has been closed due to the raising of UNC [0884/A - Extending the PC4 Read Submission Window](#).
- [0879 - Review of current Supply Meter Point Classes \(Class 1, 2, 3 and 4\)](#): The second meeting took place in August, where potential scenarios and things to consider were discussed.

IGT UNC Impact Assessment

The Chair asked about any potential Modifications which will be needed, and whether anyone would be willing to act as sponsor. CG queried if there would be a Modification required to address housekeeping changes on the Known Issues Register. TL responded that these issues would have to be looked at and either a sponsor found for a singular housekeeping change or adding housekeeping changes to other raised Modifications if the relevant sections match up and the Modification Proposer is happy to do so.

TL added that there were no other Modifications that need to be raised quickly but would welcome anyone who showed an interest in acting as a Proposer for one of the future Modifications. The Chair added that a IGT UNC equivalent Modification will likely be required for [UNC0884](#). TL added that another IGT UNC equivalent Modification will likely be required for [UNC 0887 - Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS](#), especially as the UNC Modification Proposer, National Gas Transmission, is unable to raise IGT UNC Modifications.

8. IGT UNC Known Issues Register

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

AOB

9. Project Trident

The Chair asked KA for an update on Project Trident. KA explained to the Workgroup that Project Trident is to re-platform the UK Link system as the current system is no longer going to be supported by SAP. KA added that the first customer meeting with the Senior Leadership Team was on Monday 9th September 2024 and informed Parties that they would be welcome to join future meetings. The Chair added that Shippers are already being contacted through the UNC. They noted that the current UK Link system supports a lot of IGT UNC processes, including switching, and asked parties to consider these potential impacts if they get involved with the project.

10. Authority Update

TL provided the following updates on behalf of Matthew Brown:

- To inform their approach to development of the Strategic Direction Statement (SDS), Ofgem have recently completed a series of workshops with code panels and code administrators. Ofgem thanked anyone who attended, their insights will shape development of the SDS going forward. The next opportunity to contribute to development of the SDS will be the winter SDS consultation.
- Ofgem [published their consultation decision](#) on 22 August. It confirms their approach to implementation and also explains their upcoming next steps. If you have any questions about the decision, please contact Ofgem at industrycodes@ofgem.gov.uk.
- Ofgem anticipate that the government response to their [joint consultation with DESNZ](#) will be published in the autumn.

- Session 4 of the Modification Process Workgroup (MPW) took place on 5 September. It discussed what skill set a Code Manager would need to effectively fulfil its role in the modification process. How decisions would be made in the modification process was also discussed including the role of the Stakeholder Advisory Forum (SAF) and whether a SAF should vote. This session looked at how effectively code modifications ‘flow through’ to system bodies under the current framework, and how this could be improved, including through the use of Ofgem's new power to direct system bodies. Lastly, the MPW considered if cross-code working arrangements could be improved to facilitate a smoother transition and in the enduring governance framework.

The next Workgroup meeting is scheduled for Thursday 10th October 2024.

Annex 1 – Actions Table

Reference	Action	Owner	Status
24/08 - 01	<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>	IGTs	Closed
24/09 - 01	IGTs to respond to Centrica to confirm whether backing data is sent along with Must Read invoices to Shippers	IGTs	Open