



**IGT UNC 24-10 Modification Workstream Meeting**

**Draft Minutes**

**Thursday 10<sup>th</sup> October 2024 via Teleconference**

<b>Attendee</b>	<b>Initial</b>	<b>Organisation</b>	<b>Notes</b>
Anne Jackson	AJ	Gemserv	Chair
Alison Beard	AB	Gemserv	
Charlotte Gilbert	CG	BUUK	
Cher Harris	CH	Indigo Pipelines	
Eilidh McNally	EM	Last Mile Gas	
Gareth Powell	GP	E.ON UK	
Josie Lewis	JL	CDSP	
Lee Greenwood	LG	Centrica	
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 Erin McFeeley (Last Mile Gas), Ellie Osobina (Ofgem) and Michelle Brown (Energy Assets).

**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. TL added Item 14 – Code Administrators' Code of Practice (CACoP) Survey and HF added item 15 – Authority Update.

**3. Approval of the Previous Minutes 24-09**

Talia Lattimore (TL) informed the Workgroup that no comments were received for the draft 24-09 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:

- **24/09 – 01: IGTs to respond to Centrica to confirm whether backing data is sent along with Must Read invoices to Shippers.** LG confirmed that CG and BUUK had reached out to Centrica to confirm that backing data is sent along with Must Read invoices and was

happy with the responses from IGTs, including those from the September Workgroup meeting.

Action closed.

## **MODIFICATIONS**

### **5. IGT173 Testing Update**

GP informed the Workgroup that the testing period had gone well, and they were hoping to finish testing early. LG added that Centrica have not been able to take part in testing yet but expected to commence within the next few days. GP added that the other shippers involved had been testing successfully. The Chair asked if any drawbacks had been found or identified during the testing process. GP responded that there had been some minor errors found, such as the expected location for the Communication Type 2 files being different for testing and the IX portal accepting duplicate files if they were in the correct file format. GP added that no issues had been found that would delay the targeted implementation date for IGT173 in November 2024.

The Chair asked the IGT representatives involved in the testing process for feedback. CH responded that GP had covered the main issues discovered during the testing process and advised that this would need to be drawn out in the post-testing report to ensure all parties are clear on the process ahead of implementation.

The Chair noted that the plan had been for the post-testing report to be available for the October 2024 IGT UNC Panel meeting and asked if this would be a late paper. TL responded that KD had warned previously that the report would likely be a late paper as the contingency period for the testing process is set to run until Friday 18 October, which is Paper Day for the Panel meeting. GP confirmed this.

EM asked if the implementation date for IGT173 is set for 8<sup>th</sup> November. TL and JL confirmed this. GP added that this date has been set to avoid clashing with any billing runs. LG added that there is a contingency implementation date of 15<sup>th</sup> November if it is not ready beforehand. TL added that communications will be sent out once the implementation date has been confirmed after the Panel meeting.

### **6. Independent System Operator and Planner (ISOP) Modification Update**

CG informed the Workgroup that there was no longer a need for an urgent ISOP Modification, regarding introducing ISOP as a concept and changes in data permissions. CG added that Ofgem had changed their stance in [their response to their ISOP consultation](#) and will now abstract data through the CDSP, so these changes will now go through normal DSC third-party procedures. CG added that they sit as an IGT representative at the DSC Contract Management meetings. The Chair asked CG if any immediate changes were expected at DSC Contract Management meetings, and whether it would be raised by Ofgem or Xoserve. CG responded that they were unsure at the moment but imagined that this change would come in stages. They added that David Addison had submitted a

disclosure request report at the last DSC Contract Management meeting. JL responded that they would find out what this report detailed.

The Chair noted that Day 1 of National Energy System Operator (NESO) was Tuesday 1<sup>st</sup> October 2024 and so all the changes proposed by Ofgem have now been implemented using their new powers under the Energy Act. The Chair also noted that whilst these powers meant Ofgem could implement Code changes without going through the normal processes and would use their own consultation process to discuss and inform parties of their intentions.

The Chair added that following the implementation of NESO and the associated Code Changes as of this month and considering that an urgent IGT UNC Modification is no longer required, there will not be a need for the Workgroup to keep a watching brief going forwards.

## **STANDING ITEMS**

### **7. Cross Code Modification Implications Tracker**

TL provided the Workgroup with the following updates:

#### Watch List

- **0896 - Reducing the current Code Cut-Off Date (Line in the Sand) from 3 to 4 years to 2 to 3 years:** This is an additional modification proposal to the area of governance being considered by [UNC 0886 - Amend the Code Cut-Off Date to a Rolling Period](#). Whilst 0886 is aiming to change the cut-off from a fixed specific date to a rolling three-year period, 0896 would keep the current standalone cut-off date, but reduce it by a year. Although there are no IGT UNC changes anticipated, 'line in the sand' governance applies in the IGT UNC and so there will be an impact. When the legal drafting is available, any necessary Code amendments for the IGT UNC will be identified.

JL added that the Proposer for ~~0886~~0896 is hoping for an implementation date of April 2025.

TL noted that the Workgroup Report is set to go to UNC Panel in February 2025.

LG noted that the Must-Read generation and submission of reads could be impacted by changing the cut-off date from 3 to 2 years. TL added that they would bring this up in a 0896 Workgroup.

- **0895 - Replacing 'Energy Networks Association' with another publishing method:** ENA are not referenced in the IGT UNC, so no expected Code impact.
- **0881 - Review and consolidation of UNC Transition Document TDIIC - Transitional Rules:** The report back to the UNC Panel has been delayed. There will be an IGT UNC impact, but the full extent of this will be known once the legal drafting is available. CG highlighted a housekeeping change that will be necessary, due to a reference in Section E Paragraph 22 of the UNC.
- **0878 - Use of Entry Capacity Holdings at Easington at the Rough Storage ASEP in Winter 2024/2025:** This Modification was implemented on 10<sup>th</sup> September 2024. No expected impact to the IGT UNC.

- **[0876 - Updates to the Annual Quantity \(AQ\) amendment process](#)**: The report back to the UNC Panel has been delayed. No expected Code impact but potential impact on IGTs.
- **[0871 - Facilitating IGTs with NTS Entry](#)**: This Modification has been withdrawn by the Proposer as there was more support for another modification solution, [UNC 0887 - Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS](#). The UNC 0887 Report to Panel is due in January 2025. There is an expected impact to the IGT UNC, and once legal drafting is available for 0887, a potential IGT UNC marrying Modification will need to be raised. The Chair noted that the Proposer for UNC 0887, National Gas Transmission, are unable to raise an IGT UNC Modification, so a different Proposer will be needed.

#### IGT UNC Equivalent Modifications

- **[0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers](#)**: JL asked for an update on an IGT UNC equivalent Modification for 0854. TL responded that Michelle Brown (Energy Assets) had volunteered to sponsor this Modification at the September Workgroup meeting, but there were no further updates since and they would follow up after the meeting. JL asked that if it was worth keeping 0854 on the Watch List, even if the Modification has already been implemented. TL responded that they were happy to do this or place it under the IGT UNC Equivalent Modifications tab as they expect a Modification to be raised at some point. They added that it could also be added to the Horizon Scanner due to be discussed further as part of Item 9. CG added that [UNC 0864 - Update of UNC Code Communication Methods](#) should be tracked similarly, as an IGT UNC equivalent Modification will be raised at some point, which they are sponsoring.
- **[0843 – Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert](#)**: It is expected that amended legal text will be available to review at the next 0843 Workgroup on 23<sup>rd</sup> October. Once this legal text is published, the Code Administrator can begin to look at the IGT UNC equivalent legal text for Modification, [IGT165 - Independent Shrinkage Expert and Independent Shrinkage Charge](#). They will confirm with the Proposer, David Morley (OVO) that IGT165 still reflects the updated UNC 0843 Modification. It is hoped that IGT165 can be brought back at the November IGT UNC Workgroup.
- **[0819 - Establishing/Amending a Gas Vacant Site Process](#)**: Both this Modification and the IGT UNC equivalent [IGT168 – Establishing/Amending a Gas Vacant Site Process](#) are set for a November release. Xoserve have published an implementation date of 8<sup>th</sup> November for both Modifications and the Code Administrator is in discussions with the Joint Office to agree on this date. LG confirmed that this implementation date had been discussed at the most recent DSC Change Management meeting, with a contingency date of 15<sup>th</sup> November. TL added that once the Joint Office have provided confirmation on the implementation date, an updated Notice of Implementation will be sent out.

#### Review Groups

- 0879 - Review of current Supply Meter Point Classes (Class 1, 2, 3 and 4)**: LG informed the Workgroup that the next standalone meeting for the Review Group has been pushed back to 15<sup>th</sup> November. The Chair confirmed that UNC 0879 will also be discussed at the Distribution Workgroup on 23<sup>rd</sup> October.

CG added that a Request for Information has put out by Xoserve for this Review Group which closes for responses on 18<sup>th</sup> October. JL informed the Workgroup that this survey will help structure future Review Group meetings and be able to target specific issues initially. JL added that they can forward this onto the Code Administrator. The Chair asked if the survey is directed at Shippers or all parties. JL responded that it is open to all parties. The Chair added that any changes will impact IGT governed sites and encouraged any interested parties to attend the Review Group.
- 0849 - Commercial Framework Review to Enable Hydrogen Blending**: The next meeting is set for 6<sup>th</sup> November. There is expected to be an IGT UNC impact, which will be evaluated as the review progresses. This Review Group was extended by 6 months to March 2025.

## **8. IGT UNC Known Issues Register**

TL advised the Workgroup that there were no new updates to the Known Issues Register. CG suggested that the housekeeping change required as a result of UNC 0881 is added.

CG asked if all of the pending housekeeping changes listed on the Known Issues Register are up to date. TL responded that they would go through the list to ensure its updated, ahead of a potential housekeeping Modification being raised to implement these changes. CG added that they would be happy to sponsor this Modification.

TL suggested that the Known Issues Register may not be the best location for housekeeping changes. CG agreed and suggested the Cross-Code Modification Implications Tracker may be more appropriate, given that many of the housekeeping amendments come from UNC Modifications or changes to other Codes.

**24/10 – 01: Code Administrator to review the list of outstanding Housekeeping Changes, including how and where this list is recorded**

### **AOB**

## **9. Horizon Scanner**

TL informed the Workgroup that LG had raised a question at the September IGT UNC Panel meeting about a Horizon Scanner. They added that a further discussion had taken place that some Codes use Horizon Scanners to track future issues, but the IGT UNC had never had one. LG added that Centrica had reached out to all Codes to ask about Horizon Scanners following internal discussions.

TL presented a concept of a IGT UNC Horizon Scanner to the Workgroup, noting that an action had been taken to do so at the last Panel meeting. They added that this could be used to track more

widespread impacts from across the industry, such as the recent NESO/ISOP developments, as well as Code reform milestones and tasks. TL asked the Workgroup for feedback on the concept, noting that this Horizon Scanner will be useful for the Code Administrator but wanted to know if the wider industry would agree.

CG responded that the Horizon Scanner is a worthwhile inclusion and added that the Xoserve Service Line Review could be included, along with the associated proportion of costs which will affect IGTs.

LG added that the Horizon Scanner was in line with those from other Codes they had seen and that it would be a useful addition.

TL suggested that the next steps would be to populate the Horizon Scanner with updated information and share with Workgroup attendees ahead of the November meeting. They added that the Horizon Scanner could be reviewed monthly, and they are happy to accept suggestions from attendees of what events to include on the Scanner.

#### **24/10 – 02: Code Administrator to continue development of the IGT UNC Horizon Scanner and include live information to present to the November Workstream meeting**

##### **10. SEC MP272 'SMKI Document Set Changes 2024'**

TL informed the Workgroup that the Code Administrator had been approached by the Smart Energy Code (SEC) to highlight a Modification expected to impact Gas Network parties.

AB added that the Security Subcommittee for SEC have an arrangement where Gas Transporters (GTs) can apply for Smart Metering Key Infrastructure (SMKI) certificates to be able to access data through the DCC. They added that no GT uses this functionality, which costs a lot as it is internet-based, so SEC are looking to remove it.

AB added that Gordon Hextall, chair of the Security Subcommittee, has written out to GTs to confirm there is no issue with the removal of this functionality. AB added that they were hoping to draw attention to the Modification today so the IGTs can confirm there is no issue.

CG asked if this communication had gone out to all GTs or just large GTs. AB responded that they had been told all GTs had been contacted. TL suggested that this communication could be passed onto the Code Administrator, who could share it with IGTs. AB agreed and added that IGTs could contact SECAS directly by emailing [sec.change@gemserv.com](mailto:sec.change@gemserv.com)

##### **11. Ofgem Cross Code Digitalisation Steering Group (CCDSG)**

TL informed the Workgroup that Jenny Rawlinson (BUUK), who is the IGT UNC representative at the CCDSG, suggested at the September Panel meeting that it could be useful for the Code Administrator to attend. They added that the CCDSG Chair, Charles Clark, is looking for more involvement from the industry and is open to Code Managers and Administrators attending. TL added that the CCDSG's aim is to investigate the sharing and digitalisation of data.

LG asked who currently attends the CCDSG. TL responded that they could not find a list of attendees or open information on the group, but they are aware that the REC, DCC and some large Supplier/Shipper organisations are represented. TL added that the group was discussed at the latest CACoP meeting, when other Codes and parties were encouraged to get involved. LG responded that they were not able to find any information on the CCDSG and suggested that Ofgem should make this more accessible to encourage engagement. TL responded that this had been raised with Ofgem at the CACoP meeting.

TL added that the CCDSG has only had 2 meetings to date and only just established a draft Terms of Reference, so the group is in very early stages. They added that it is likely that the outputs of this group will go into future consultations.

The Chair noted that [Charles Clark had presented to the IGT UNC Panel at the April 2024 meeting](#) and promoted the CCDSG, which Jenny Rawlinson volunteered to attend.

## **12. Joint Office & Xoserve Digitalisation Stakeholder Advisory Forum (SAF)**

TL informed the Workgroup that a SAF event is taking place on Tuesday 22<sup>nd</sup> October. They added that this event is a joint workshop organised by Xoserve and the Joint Office, who are hoping to develop a scope for a digital gas code and are looking for inputs from UNC users and others within the gas industry.

LG asked that if the event is focused on potentially digitalising the UNC and if so where does this leave the IGT UNC. TL added that the Code Administrator will be attending this event in order to provide support for future-proofing the UNC and IGT UNC, particularly as the two gas codes will be merging as part of Code Reform plans. CG added that they believe the forum is looking at joining together the UK Link and UNC documents, and they have been asked to attend as the IGT representative on the UNC Panel.

The Chair noted that the IGT UNC Panel have written to the UNC Panel on several occasions to encourage better cross code working and have also suggested that the digitalisation of the gas codes would facilitate that process. They added that although it appears the forum is looking exclusively at the UNC Code, there could be a significant impact on the IGT UNC as it references the UNC Code extensively, and it could lead to necessary Modification(s).

## **13. November 2024 Release**

TL informed the Workgroup that there are two Modifications that are due for implementation in November 2024. The first Modification is [IGT173 - Gateway delivery for RPC Data](#) which is subject to a Panel decision on implementation later this month following the conclusion of testing. The second Modification is [IGT168 - Establishing/Amending a Gas Vacant Site Process](#), which Xoserve have listed on their website as being implemented on 8<sup>th</sup> November, but the Code Administrator and Joint Office are working to confirm. The Code Administrator is preparing in the event that both Modifications will be implemented as planned in November and will send out communications on 10<sup>th</sup> October

regarding the November release, along with updated Notices of Implementation once either Modification is confirmed.

TL added that the current date for the IGT UNC November 2024 release is 7<sup>th</sup> November, and Panel will be asked to change the date to 8<sup>th</sup> November at the next meeting to align with the implementation dates set by Xoserve and the Joint Office.

#### 14. CACoP Survey

TL informed the Workgroup that CACoP and Ofgem have produced an online survey on Code Administrators for parties to respond to. TL added that this survey is largely based on an old Ofgem annual Code Administrator survey, and parties will have a month to respond. TL added that parties will be encouraged to submit one response for each Code that they engage with, and further communications will be sent out by each Code to their respective distribution lists.

CG asked what happens with the survey results. TL responded that a Joint Report will be produced covering every Code, and an individual report for each Code. They added that CaCoP have tried to align with the old Ofgem Code Administrator survey as much as possible, to be able to track any trends from previous years. TL also provided attendees with a [link to the reports published from the last Code Administrator survey undertaken](#).

The Chair encouraged attendees to respond to the IGT UNC Code Administrator survey, adding that all feedback is welcomed.

#### 15. Authority Update

HF read out the following lines of behalf of Ellie Osobina:

- [The Government response to the consultation on code manager licensing and secondary legislation](#) was published on 8 October. If you have any questions about the contents of the response, please email them to [industrycodes@ofgem.gov.uk](mailto:industrycodes@ofgem.gov.uk) and [codereform@energysecurity.gov.uk](mailto:codereform@energysecurity.gov.uk). The Government intends to lay secondary legislation to formally establish the code manager selection regime by the end of 2024. Ofgem intends to further consult on its process for Code Manager selection and their assessment for both competitive and non-competitive basis. Over the coming months further refinement and development of the draft standard licence conditions for code managers will take place with a consultation on the full set of provisions in early 2025. Within this consultation, Ofgem will also consult on updating the parameters for appeals to the Competition and Markets Authority (CMA) on Ofgem's code modification decisions.
- As with previous years, Ofgem will have in place a publishing moratorium over the festive period. The last publishing day will be Friday 13 December 2024 and Ofgem will begin to publish documents again as normal on Friday 3 January 2025.
- The final Modification Process Workshop (MPW) session was held on 17 September. The discussion included the new direct Code change power and how the Code Modification



process might need to change to accommodate Ofgem using this process. It also looked at the Significant Code Review (SCR) process, including possible roles for the Code Manager. How transitioning to a Code Manager could impact the modification process and the roles Ofgem / Code Panels / incoming Code Managers could take were also discussed. The session also considered whether or not an updated process should place a limit on the number of alternative modifications able to be raised and looked at detailed operational elements of Stakeholder Advisory Forums (SAF), e.g. quoracy. Lastly, it discussed the role of the Competition and Markets Authority appeal route on Ofgem Code Modifications decisions.

**The next Workgroup meeting is scheduled for Thursday 14<sup>th</sup> November 2024.**

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**Annex 1 – Actions Table**

Reference	Action	Owner	Status
24/09 - 01	<i>IGTs to respond to Centrica to confirm whether backing data is sent along with Must Read invoices to Shippers</i>	<i>IGTs</i>	<i>Closed</i>
24/10 - 01	Code Administrator to review the list of outstanding Housekeeping Changes, including how and where this list is recorded	Code Administrator	Open
24/10 - 02	Code Administrator to continue development of the IGT UNC Horizon Scanner and include live information to present to the November Workstream meeting	Code Administrator	Open

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