

# Modification At what stage is this document in the process? O1 Modification O2 Workgroup Report O3 Draft Modification Report O4 Final Modification Report

### **Purpose of Modification:**

In 2023, there was a government decision to have a switch off the PSTN (Public Switched Telephone Network). This decision affects fax machines. 'Fax' and 'facsimile' are words mentioned in the IGT UNC, and so these will need to be removed to reflect this decision.

In addition to this, housekeeping grammar changes have been identified.

The Proposer recommends that this modification should be:

- subject to self-governance
- assessed by a Workgroup



proceed to Consultation

This modification will be presented by the Proposer to the Panel on dd mmm yyyy (Code Administrator to provide date). The Panel will consider the Proposer's recommendation and determine the appropriate route.

#### **Impacted Parties and Codes**



High Impact:

None identified



Medium Impact:

None identified



Low Impact:

All parties currently obligated by IGT UNC Code Communication via facsimile.



#### Contents Any questions? Contact: 3 Summary **Code Administrator** 2 Governance 3 Why Change? 4 iGTUNC@Gemserv.c **Code Specific Matters** 5 4 5 Solution 02070901044 **Impacts & Other Considerations** 11 Proposer: 6 BUUK **Relevant Objectives** 13 7 **Implementation** 13 8 natasha.perry@bu-**Legal Text** 14 uk.co.uk 10 Recommendations 14 07485980895 Other: **Timetable Insert name** email address. The Proposer recommends the following timetable: telephone Initial consideration by Workgroup (pre-14th November 2024 Other: Modification) **Insert name** Amended Modification considered by Workgroup Workgroup Report presented to Panel email address. Draft Modification Report issued for consultation 2<sup>nd</sup> December 2024 telephone 16th December 2024 Consultation Close-out for representations Other: Variation Request presented to Panel **Insert name** Final Modification Report available for Panel 18th December 2024 20th December 2024 Modification Panel decision email address. telephone



# 2 Summary

#### What

A government decision took place in 2023, to switch off the PSTN (Public Switched Telephone Network). This decision affects a few traditional services, such as fax machines. There are mentions of 'fax' and 'facsimile' in the IGT UNC and the SOS Query Management ancillary document. Both documents need to be altered so these words are no longer in Code.

There are additional changes that need to be made to correct grammar in the IGT UNC. It was noticed that 'email' has been written out as 'e-mail' multiple times in Code. All mentions of 'email' need to be written in the same way for consistency.

#### Why

In 2023, the government voted to remove facsimile machines from being used as a method of communication. The decision was made to stop producing the software that allows people to communicate via fax. This therefore requires a change to the IGT UNC, which has mentions of both 'fax' and 'facsimile' to reflect the removal of their usage.

#### How

Wherever facsimile or 'fax' are mentioned in Code, 'email' will take its place to allow a modernised technology to be used for communication purposes in its place. The IGT UNC have decided to replace fax with email as a commonly used, and secure way of communicating. The UNC, REC and SEC have already raised this change for their Code. It was raised in discussions at workgroup, where it was made clear that the favoured communication method would be email, to replace fax. All these modifications have been approved and so, for the sake of consistency between Codes, the IGT UNC should also take the same approach.

Grammer errors have also been found. 'e-mail' which occurs multiple times in the IGT UNC is being corrected to read 'email'.

#### 3 Governance

## **Justification for Self-Governance Procedures**

Self-Governance

This Modification meets the requirements for Self-Governance and there are no identified material impacts. It is believed that compliance with UNC obligations will be unaffected by the update to Code Communications.

It is unlikely to have a material effect on: existing or future gas consumers; ii. competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes; iii. the operation of one or more pipeline system(s); iv. matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and v. the network code modification procedures; and

b.is unlikely to discriminate between different classes of parties to the uniform network Code / relevant gas transporters or gas shippers.



#### **Requested Next Steps**

This modification should:

proceed to Consultation

We propose that this Modification will be discussed as a pre-Modification at Workgroup on the 14<sup>th</sup> of November 2024 (Add any workgroup comments for progression)

## 4 Why Change?

The removal of 'fax' and facsimile' from the IGT UNC is required as facsimile machines are no longer a supported form of communication. The proposed replacement is email, as it is already a greatly modernised communication system and will mean there are no foreseen costs involved to set up a new communication portal. Email is available to all, it's efficient and allows for instant communication.

If the change from facsimile to email isn't made, people may still think it is a viable form of communication, and this could cause issues and delays in passing information on.

This will impact the IGT UNC as the Code mentions both 'fax' and 'facsimile'. Changes must be made at the earliest convenience to allow for industry to adapt and ensure new communication methods are set up.

This issue has already been resolved in the UNC, REC and SEC. All Codes have decided to replace fax communications with email. All Modifications, including the proposal for this one, are discussing the same topic and amending their communication methods in line with the government's decision.

Furthermore, grammatical errors have been identified, which will be corrected through this Modification. These alterations need to take place for general flow and clarity of the IGT UNC, as well as making sure information reads as it is intended to. This is simply ensuring all formats are consistent throughout the Code.



# 5 Code Specific Matters

#### **Technical Skillsets**

N/A

#### **Reference Documents**

Awareness of: https://business.bt.com/insights/uk-pstn-switch-off/

Awareness of: https://www.ifaxapp.com/blog/environmental-impact-of-faxing/

Awareness of UNC equivalent: https://www.gasgovernance.co.uk/0864

Awareness of REC equivalent: https://recportal.co.uk/group/guest/-/removal-of-facsimile-as-a-method-of-

code-communication

Awareness of SEC equivalent: <a href="https://smartenergycodecompany.co.uk/modifications/june-2024-sec-">https://smartenergycodecompany.co.uk/modifications/june-2024-sec-</a>

release-housekeeping/

## 6 Solution

Code Reference (IGT UNC main document)	Page No.	Current Text	Proposed Text
6.1	3	Inclusion of SPA Fax Forms as an Ancillary Document Amendment to AQ Values present within the CSEP NExA Table Housekeeping Change Section E Clause 3.4	Inclusion of SPA 'email' Forms as an Ancillary Document Amendment to AQ Values present within the CSEP NExA Table Housekeeping Change Section E Clause 3.4



G 13.5	60	Where the Invoice Document number is not quoted (in accordance with Clause 13.4) with any remittance made by or on behalf of a Pipeline User, and no Invoice Remittance Advice corresponding to the remittance is submitted, the Pipeline Operator will endeavour to obtain the Pipeline User's instructions (by telephone or facsimile) as to the application thereof; but if it has not (by the Business Day following the Day of the remittance) obtained such instructions, the Pipeline Operator will apply the amount remitted to or towards Invoice Amount(s) in order of Invoice Due Date (the earliest first) and proportionately as between Invoice Amounts with the same Invoice Due Date, but applying such amount last to any Invoice Amounts which are subject to an Invoice Query	Where the Invoice Document number is not quoted (in accordance with Clause 13.4) with any remittance made by or on behalf of a Pipeline User, and no Invoice Remittance Advice corresponding to the remittance is submitted, the Pipeline Operator will endeavour to obtain the Pipeline User's instructions (by telephone or 'email') as to the application thereof; but if it has not (by the Business Day following the Day of the remittance) obtained such instructions, the Pipeline Operator will apply the amount remitted to or towards Invoice Amount(s) in order of Invoice Due Date (the earliest first) and proportionately as between Invoice Amounts with the same Invoice Due Date, but applying such amount last to any Invoice Amounts which are subject to an Invoice Query
I 5.1 (a)	88	a single telephone number and a single facsimile number by means of each of which the Pipeline Operator may contact, 24 hours a Day, a representative of the Pipeline User in an Emergency or Local Emergency for any purpose pursuant to this Part I;	a single telephone number and a single 'email address' by means of each of which the Pipeline Operator may contact, 24 hours a Day, a representative of the Pipeline User in an Emergency or Local Emergency for any purpose pursuant to this Part I;
l 8.1 (d)	89	in the case of a Large Firm Supply Point, the Annual Quantity of which is greater than 1,464,000 kWh (50,000 therms), one facsimile number, for the purposes of receiving communications pursuant to this Part I which is able to receive transmissions 24 hours a day.	in the case of a Large Firm Supply Point, the Annual Quantity of which is greater than 1,464,000 kWh (50,000 therms), one 'email address', for the purposes of receiving communications pursuant to this Part I which is able to receive transmissions 24 hours a day.
I 9.1 (d)	90	one facsimile number, for the purposes of receiving communications pursuant to Parts C and I, which is able to receive transmissions 24 hours a day.	one 'email address', for the purposes of receiving communications pursuant to Parts C and I, which is able to receive transmissions 24 hours a day.



K 1.2 (iii)	97	the address and telephone and facsimile numbers of the Applicant User, and the individual for whose attention notice is to be marked, for the purposes of notices under Part K;	the address and telephone and 'email addresses' of the Applicant User, and the individual for whose attention notice is to be marked, for the purposes of notices under Part K;
K 34.3	116	Any notice shall be in writing and shall be addressed to the recipient Party and sent to the recipient Party's address or facsimile number referred to in Clause 34.4 and marked for the attention of the representative (identified by name or title) referred to in that paragraph or to such other address or facsimile number and/or marked for such other attention as the recipient Party may from time to time specify by notice given in accordance with this Clause 34.1 to the Party giving the notice.	Any notice shall be in writing and shall be addressed to the recipient Party and sent to the recipient Party's address or 'email address' referred to in Clause 34.4 and marked for the attention of the representative (identified by name or title) referred to in that paragraph or to such other address or 'email address' and/or marked for such other attention as the recipient Party may from time to time specify by notice given in accordance with this Clause 34.1 to the Party giving the notice.
K 34.4	116	The initial address or facsimile number of a Party and representative for whose attention notices are to be marked shall be as specified by a Pipeline User pursuant to Clause 1 or by the Pipeline Operator pursuant to Clause 2.	The initial address or 'email address' of a Party and representative for whose attention notices are to be marked shall be as specified by a Pipeline User pursuant to Clause 1 or by the Pipeline Operator pursuant to Clause 2.
K 34.5	116	Any notice shall be given by letter delivered by hand or sent by first class prepaid post (airmail if overseas) or by facsimile and shall be deemed to have been received:	Any notice shall be given by letter delivered by hand or sent by first class prepaid post (airmail if overseas) or by 'email' and shall be deemed to have been received:
K 34.5 (c)	116	in the case of facsimile, on acknowledgement by the recipient Party's facsimile receiving equipment.	in the case of 'email', on acknowledgement by the recipient Party's 'email' receiving equipment.
K 34.7 (b) 116		any other communication to be made by System Communication or by telephone or by facsimile where the context requires that such communication be treated as received within the Day on which it is given.	any other communication to be made by System Communication or by telephone or by 'email' where the context requires that such communication be treated as received within the Day on which it is given.



K 35.2	117	Where a Party seeking to give a Code Communication by telephone is unable to contact a representative of the receiving Party, such Party must give the communication by facsimile and the communication will not be deemed to have been given	Where a Party seeking to give a Code Communication by telephone is unable to contact a representative of the receiving Party, such Party must give the communication by 'email' and the communication will not be deemed to have been given
		except in accordance with Clause 34.5(c).	except in accordance with Clause 34.5(c).
N 3.3.2	193	The UK Link Manual specifies in respect of each Code Communication therein listed whether it is to be given as a UK Link Communication, by Active Notification System, by Conventional Notice, by e-mail, by facsimile or by telephone, and in some cases alternative such means by which it may be given; and a Code Communication may only be given by the means so specified or (where alternative such means are specified) by one of such alternative means.	The UK Link Manual specifies in respect of each Code Communication therein listed whether it is to be given as a UK Link Communication, by Active Notification System, by Conventional Notice, by e-mail or by telephone, and in some cases alternative such means by which it may be given; and a Code Communication may only be given by the means so specified or (where alternative such means are specified) by one of such alternative means.
N 3.3.2	193	3.3.2 The UK Link Manual specifies in respect of each Code Communication therein listed whether it is to be given as a UK Link Communication, by Active Notification System, by Conventional Notice, by e-mail, by facsimile or by telephone, and in some cases alternative such means by which it may be given; and a Code Communication may only be given by the means so specified or (where alternative such means are specified) by one of such alternative means.	3.3.2 The UK Link Manual specifies in respect of each Code Communication therein listed whether it is to be given as a UK Link Communication, by Active Notification System, by Conventional Notice, by 'email', by facsimile or by telephone, and in some cases alternative such means by which it may be given; and a Code Communication may only be given by the means so specified or (where alternative such means are specified) by one of such alternative means.



Code			
Reference (IGT UNC ancillary documents)	Page No.	Current Text	Proposed Text
SOS query management 3.1 (d)	8	An initial handshake file (automated e-mail or equivalent), will be sent from the Pipeline Operator to the Pipeline user, including a copy of the original query (if emailed), to confirm receipt. The Pipeline Operator will respond thereafter, per Section 3.2 (c), using the Query Response QTR file, or equivalent, as defined in the relevant Pipeline Operator's Network Code, either accepting or rejecting the query. The response file will include the Query Type and Reference Number assigned by the Pipeline Operator. If rejected, the rejection reason will be contained within the QTR file, or equivalent, as defined in the relevant Pipeline Operator's Network Code, in line with the categories in Appendix 7.3. However at the discretion of a Pipeline Operators, they may telephone a Pipeline User to resolve a particular issue rather than rejecting it.	An initial handshake file (automated 'email' or equivalent), will be sent from the Pipeline Operator to the Pipeline user, including a copy of the original query (if emailed), to confirm receipt. The Pipeline Operator will respond thereafter, per Section 3.2 (c), using the Query Response QTR file, or equivalent, as defined in the relevant Pipeline Operator's Network Code, either accepting or rejecting the query. The response file will include the Query Type and Reference Number assigned by the Pipeline Operator. If rejected, the rejection reason will be contained within the QTR file, or equivalent, as defined in the relevant Pipeline Operator's Network Code, in line with the categories in Appendix 7.3. However at the discretion of a Pipeline Operators, they may telephone a Pipeline User to resolve a particular issue rather than rejecting it.
SOS query management 3.1 (f)	9	f) Measurement within the SoS will only apply to those queries issued to a Pipeline Operator using the agreed mechanism. This template, provided in 6.2, will be submitted electronically via email, or other agreed method. As a contingency fax may be used.	f) Measurement within the SoS will only apply to those queries issued to a Pipeline Operator using the agreed mechanism. This template, provided in 6.2, will be submitted electronically via email, or other agreed method. As a contingency "may be used.



SOS query management 3.1 (h)	9	Pipeline Operators will provide an appropriate and up-to-date contact point for query submissions (according to query type if required), including telephone/fax numbers and email addresses, for each type of query included in the SoS regime. The contact information will be stored centrally and can be located on the Pipeline Operator UNC website or will be provided by the Representative. The content will follow that detailed in Appendix 7.4. It is the Pipeline Operator's responsibility to ensure the latest and most contact accurate information is provided and stored.	Pipeline Operators will provide an appropriate and up-to-date contact point for query submissions (according to query type if required), including telephone and e-mail addresses, for each type of query included in the SoS regime. The contact information will be stored centrally and can be located on the Pipeline Operator UNC website or will be provided by the Representative.  The content will follow that detailed in Appendix 7.4. It is the Pipeline Operator's responsibility to ensure the latest and most contact accurate information is provided and stored.
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sOS query management 6.4 (part of an example pipeline operator query contact details form)	21	Fax Number	Remove entirely as email is already an option
SOS query management 6.4 (part of an example pipeline operator query	21	E-mail address	Email address



contact details form)			
IGT UNC Innovation derogations guidance- part of an example application form) Appendix A	8	E-mail:	Email:

# 7 Impacts & Other Considerations

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

None identified

## **Consumer Impacts**

What is the current consumer experience?

There are no foreseen consumer impacts as this IGT UNC modification only affects communications within the Code where facsimile machines may have been used beforehand.

(Workgroup comments here)

What would the new consumer experience be?

N/A



Impact of the change on Consumer Benefit Areas			
Area	Identified Impact		
Improved safety and reliability	None		
Lower bills than would otherwise be the case	None		
Reduced environmental damage  Emails eliminate paper and plastic waste from printing. The environmental benefits gained from switching to email as a IGT UNC communication method aligns with the UK's 2050 Net Zero ambitions.	Positive		
Improved quality of service	None		
Benefits for society as a whole	None		

## **Cross-Code Impacts**

There are no cross-Code impacts with this Modification. Although this Modification is referring to the same topics as UNC Mod 0864S, the changes we are making to IGT UNC are standalone. Our Proposal only impacts IGT UNC correspondence and communications, so IGT UNC parties understand the new and permanent position of fax. The UNC Modification is relating to its own documents which have no cross-Code impacts on IGT UNC documents.

UNC	
REC	
Other	
None	

#### **Environmental Impacts**

It will reduce printing.

The amount of paper waste traditional faxing generates can be significant and should not be overlooked. The environmental impact of faxing can be measured in terms of its carbon footprint, which includes the amount of greenhouse gas emissions produced during the manufacturing, use, and disposal of fax machines, toner cartridges, and paper.



# **8 Relevant Objectives**

Impact of the modification on the Relevant Objectives:				
Relevant	Objective	Identified impact		
(A) Effici	ent and economic operation of the pipe-line system	None		
(B) Co-o	rdinated, efficient and economic operation of	None		
(i)	the combined pipe-line system; and/or			
(ii)	the pipe-line system of one or more other relevant gas transporters			
(C) Effici	ent discharge of the licensee's obligations	None		
(D) Secu	ring of effective competition:	None		
(i)	between relevant shippers;			
(ii)	between relevant suppliers; and/or			
aç	etween DN operators (who have entered into transportation greements with other relevant gas transporters) and relevant hippers			
secu	ision of reasonable economic incentives for relevant suppliers to re that the domestic customer supply security standards are fied as respects the availability of gas to their domestic customers	None		
(F) Pron	notion of efficiency in the implementation and administration of the	Positive		
decis	pliance with the Regulation and any relevant legally binding sions of the European Commission and/or the Agency for the peration of Energy Regulators	None		

The removal of facsimile machines promotes efficiency and modernisation in the administration of Code. It is an outdated method of communication, therefore moving to email as an improved method of communication is the best thing for IGT UNC. It means communication can be easy, accessible and fast, therefore a positive impact to point (F).

# 9 Implementation

This Modification should be implemented as soon as possible, following approval.



# 10 Legal Text

#### **Text Commentary**

Please see section 5 for suggested changes to Code (the legal drafting will be published alongside the final version of the proposal form).

# 11 Recommendations

# **Proposer's Recommendation to Panel**

Panel is asked to:

- Agree that Self Governance procedures should apply
- Refer this proposal to Consultation