

Draft Modification Report	At what stage is this document in the process?
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IGT174:






Update of IGT UNC Code Communication Methods

01	Modification
02	Workgroup Report
03	Draft Modification Report
04	Final Modification Report

Purpose of Modification:

In 2023, there was a government decision to 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.

	<p>This Draft Modification Report has been issued for consultation at the request of the Panel. All parties are invited to consider whether they wish to submit views regarding this Self-Governance Modification.</p>
	<p>The close-out date for responses is 16th December 2024.</p> <p>Responses should be sent to IGTUNC@gemserv.com. A response template, which you may wish to use, can be found on the IGT UNC website, here.</p> <p>The Panel will consider all responses and agree whether or not this Self-Governance Modification should be made.</p>
	<p>High Impact: None Identified</p>
	<p>Medium Impact: None Identified</p>
	<p>Low Impact: All parties currently obligated by IGT UNC Code Communication via facsimile.</p>

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		Contact: Code Administrator  iGTUNC@Gemserv.com  02070901044 Proposer: BUUK  natasha.perry@buuk.co.uk  07485980895

Timetable

Modification timetable:	
Initial consideration by Workgroup (Pre-Modification Discussion)	14 th November 2024
Amended Modification considered by Workgroup	-
Workgroup Report presented to Panel	-
Draft Modification Report issued for consultation	2 nd December 2024
Consultation Close-out for representations	16 th December 2024
Variation Request presented to Panel	-
Final Modification Report available for Panel	18 th December 2024
Modification Panel decision	20 th December 2024

1 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.

Whilst reviewing the Ancillary Documents a housekeeping change was picked up in the Derogations Guidance Document, whereby a link to the IGT UNC Website was not included. This has been rectified as part of this Modification.

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.

Grammar errors have also been found. 'e-mail' which occurs multiple times in the IGT UNC is being corrected to read 'email'. One housekeeping change to an Ancillary Document is also being addressed.

2 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 pipe-line 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.

Proposer's Requested Next Steps

This Modification should:

- proceed to Consultation

This Modification was discussed as a pre-Modification at Workgroup on the 14th of November 2024. The Workgroup supported the Proposer's request that the discussions had as this meeting were sufficient to allow the Modification to proceed to Consultation after being considered by the Panel.

Panel Discussion

The Panel considered the governance route for IGT174 and unanimously agreed that this Modification meets the Self-Governance criteria and should therefore be progressed as a Self-Governance Modification Proposal.

3 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.

4 Code Specific Matters

Technical Skillsets

N/A

Reference Documents

PSTN Switch-Off: <https://business.bt.com/insights/uk-pstn-switch-off/>

Environmental impact of Fax: <https://www.ifaxapp.com/blog/environmental-impact-of-faxing/>

UNC0864: <https://www.gasgovernance.co.uk/0864>

REC Modification to remove facsimile: <https://recportal.co.uk/group/guest/-/removal-of-facsimile-as-a-method-of-code-communication>

SEC Modification to remove facsimile: <https://smartenergycodecompany.co.uk/modifications/june-2024-sec-release-housekeeping/>

5 Solution

Proposed Solution

The table below sets out the areas of change within the IGT UNC and its ancillary Documents.

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.

Grammar errors have also been found. 'e-mail' which occurs multiple times in the IGT UNC is being corrected to read 'email'. One housekeeping change to an Ancillary Document is also being addressed.

Code Reference (IGT UNC main document)	Page No.	Current Text	Proposed Text
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	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

		Amounts which are subject to an Invoice Query	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;
I 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	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.	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 except in accordance with Clause 34.5(c).	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).
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	<p>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.</p>	<p>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.</p>
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Code Reference (IGT UNC ancillary documents)	Page No.	Current Text	Proposed Text
SOS query management 3.1 (d)	8	<p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p>

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.
SOS query management 3.1 (h)	9	<p>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 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.</p> <p>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.</p>	<p>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.</p>
SOS query management 3.1 (h)	9	<p>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 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.</p>	<p>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.</p>
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 contact details form)	21	E-mail address	Email address
IGT UNC Innovation derogations guidance-part of an example application form) Appendix A	8	This document should be completed in accordance with the Innovation Derogation Guidance Document (which can be found at)	This document should be completed in accordance with the Innovation Derogation Guidance Document (which can be found on the Ancillary Documents page of the IGT UNC website)
IGT UNC Innovation derogations guidance-part of an example application form) Appendix A	8	E-mail:	Email:

Panel Discussion

The Panel considered the changes set out in the table above. A member noted that when reading through the changes it can appear as though not all changes have been marked, using N3.3.2 as an example. The Proposer clarified that each change has been pulled out individually so where there are multiple changes in a paragraph of Code text, each change has been pulled out in its own column.

The Code Administrator referenced the Legal Drafting, noting that the changes set out in the table have been drafted into Code text and change marked as they would appear in the final Code documents. The Panel member agreed that the changes set out in the Legal Drafting document were clear and had no further concern.

No other issues were raised, and the Panel had no further comment on the solution as set out above.

6 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 agreed with the Proposer's view.

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 as a result of this Modification and the changes we are making to IGT UNC are standalone. However, this Modification is making changes to the IGT UNC that other Codes have made (for example, UNC Mod 0864S). 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	<input type="checkbox"/>
REC	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input type="checkbox"/>

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.

Panel Discussion

A Panel member asked whether consideration had been given to the potential benefits of this Modification, noting the potential cost savings as a result of less printing. Other Panel members considered this and recognised it as a potential cost saving benefit.

The Panel considered the rest of the impacts in full and agreed unanimously that they are accurate as set out by the Proposer.

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:

Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	None
(B) Co-ordinated, efficient and economic operation of (i) the combined pipe-line system; and/or (ii) the pipe-line system of one or more other relevant gas transporters	None
(C) Efficient discharge of the licensee’s obligations	None
(D) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers	None
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	Positive
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

Proposers Rationale

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).

Panel Discussion

The Panel considered the impacts of IGT174 against the Relevant Objectives and unanimously agreed that this Modification benefited Objective (F) for the reasons given by the Proposer.

8 Implementation

Proposed Implementation Approach

This Modification should be implemented as soon as possible, following approval. The IGT UNC Panel agreed that this Modification should be implemented as part of the next available IGT UNC Release following Approval.

Panel Discussion

The Proposer advised the Panel that whilst they cited “as soon as possible” for implementation they felt it would be appropriate to have IGT174 implemented as part of the February 2024 Release. The Code Administrator suggested that instead of citing the February Release in the Draft Modification Report, “the next available IGT UNC Release” is cited, in case something arises, and the February Release cannot be met. The Proposer and the Panel agreed with this view.

The Panel considered the proposed implementation approach, and the additional suggestion from the Proposer and Code Administrator and unanimously agreed that the Modification should be implemented as part of the next available IGT UNC Release following approval.

9 Legal Text

Legal Text

The draft Legal Text changes proposed by this Modification can be found on the IGT174 page of the IGT UNC website, [here](#).

Panel Discussion

The Panel considered the draft Legal Text and unanimously agreed that the text delivers the intent of the Modification.

10 Recommendations

Panel’s Recommendation to Interested Parties

The Panel have recommended that this report is issued to consultation for a period of two weeks and all parties should consider whether they wish to submit views regarding this Self-Governance Modification Proposal.