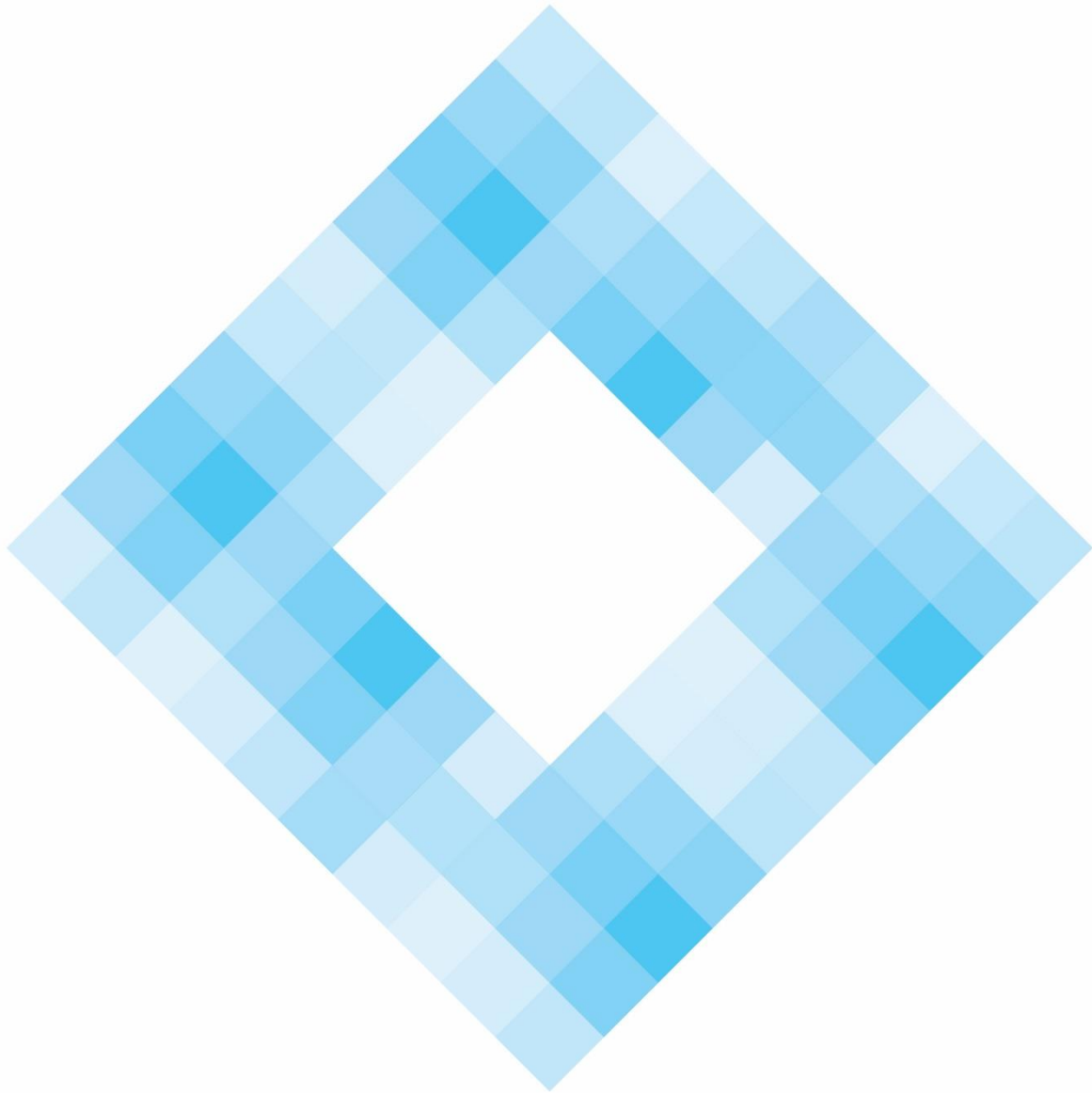


Cross-Code Working – An analysis of the current provisions

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Background

The IGT UNC Modification Panel tasked the IGT UNC Modification Workgroup to discuss the Cross-Code working between the IGT UNC and the UNC, specifically regarding difficulties with the Modifications process. This was following recent issues raised during the development of UNC691S (CDSP to convert Class 2, 3 or 4 Supply Meter Points to Class 1 when G1.6.15 criteria are met), which highlighted areas of weakness in the Cross-Code arrangements and impacted industry efforts.

UNC676R (Review of Gas Transporter Joint Office Arrangements) was a Review Group that was formed to discuss the current Gas Transporter (GT) Joint Office arrangements. The proposer of this Review Group request had asked the IGT UNC Modification Panel to feed into it on the subject of Cross Code Arrangements. Subsequently, this Review group has been withdrawn by the Proposer on the basis that the Annual Report being written by the Independent Chair of the UNC Panel and UNCC supersedes the group.

Following the development of this report, the IGT UNC Panel felt that this could feed into the UNC Annual Report to give information from IGT UNC parties on Cross-Code working with the UNC. Although this was created with the view of the Review group, its value is still applicable to cross-code working in general.

RG004 Review of IGT Governance and Administration Arrangements

In 2018 SSE raised a Review Group request, RG004 (Review of IGT Governance and administration arrangements), to address the IGT UNC governance arrangements following the implementation of Project Nexus. The Review Group considered the below suggested potential recommendations to alleviate the inefficiencies of there being two codes - the UNC and IGT UNC:

- To amalgamate all common areas of the IGT UNC and the UNC into the UNC;
- To create a common UNC and IGT UNC Modification Process; or
- To amend the IGT UNC to reference the UNC at a much higher 'section type' level rather than at the clause level.

The Review group concluded in late 2018 following the culmination of discussions, a Request for Information (RFI) and agreement of possible outcomes by the Review group. The Workgroup Report was complemented by

a 'Way Forward Summary Report'¹. The Workgroup Report included detailed options that the Workgroup considered and identified three of the options as being feasible. These were:

- **OPTION 2:** To create a common UNC and IGT UNC Modification Process so that when a Modification is raised under the UNC it considers the IGT UNC and requires any changes to the IGT UNC legal text to be produced simultaneously;
- **OPTION 5:** Allowing the Code Administrator to raise non-material Modification proposals on behalf of industry, to cut down on duplicated resource and reduce the frequency of Modification Workstream meetings; and
- **OPTION 7:** Set up a Cross-Code Work Group to look to improve the current Modification Process across both the IGT UNC and the UNC.

In its Workgroup Report² presented to the IGT UNC Modification Panel, the Workgroup concluded that;

- the best place to discuss better facilitating the change process and cross-code working would be at the monthly IGTAD meetings by the GT's and IGT's;
- the Modification templates could be revised to ensure that any proposer would have to consider consequential changes to either code;
- wider representation by the Code Administrators in other Forums might be appropriate and that Agendas could be structured differently to facilitate this.

Following further exploration, the Workgroup determined that although these options were valid, they were not the right way forward for the industry at the time. For context, the time was 2018 and the early development stages of Faster Switching and the REC were underway.

Engagement in the code at the time was relatively high in comparison to the position today. Through surveys and Workgroup discussions through 2020 parties have expressed their discomfort with accepting the current position, which is contrary to the findings of the review group in 2018.

Parties are seeking more efficient ways of working through many aspects of the Code landscape, including amalgamation and digitisation.

¹ <https://www.igt-unc.co.uk/wp-content/uploads/2018/10/RG004-way-forward-summary.pdf>

² <https://www.igt-unc.co.uk/wp-content/uploads/2018/11/RG004-WG-report.pdf>

IGT UNC Workgroup Discussion – 20-11 (12th Nov 2020)

The IGT UNC Modification Workstream meeting was presented with slides³ which suggested areas of good working practices across the two Codes and areas identified for improvement. These areas were discussed during the meeting and additional areas identified for further improvements. Questions asked of the Workgroup were:

- What has worked well between the IGT UNC and UNC change processes?
- What still needs to be improved between the IGT UNC and UNC change processes?

IDENTIFIED AREAS OF POSITIVE CROSS-CODE WORKING

- Suggested amendments to UNC legal text from the IGT UNC Code Administrator (CA) have been considered;
- The IGT UNC Panel/Workstream Chair is invited to attend the UNC Panel meetings on a monthly basis;
- UNC Workgroups commonly discuss whether there are IGT UNC implications and identify these in Modification Reports/Workgroup Reports and vice versa;
- Implementation dates are aligned across both Codes to ensure that changes are implemented simultaneously;
- Some UNC Modification proposers are approaching the IGT UNC CA proactively to discuss matters prior to raising mods; and
- The UNC Panel/UNCC Chair is increasingly considerate of IGT UNC issues and impacts.

The Workgroup discussed these positive areas of Cross-Code working and noted that it showed that the relationship between the two Codes had come a long way over recent years to overcome some of the challenges following the implementation of Project Nexus.

IDENTIFIED AREAS FOR IMPROVEMENT IN CROSS-CODE WORKING

- Earlier flagging of potential impacts to the IGT UNC from UNC Modifications;
- No GT representative at the IGT UNC Panel, although there is a non-voting seat available;
- Legal text should be made available to the IGT UNC Code Administrator earlier for an analysis to be carried out on potential Cross-Code impacts that Working Groups would not reasonably be able to identify (even where there are thought to be no perceived Cross-Code impacts by the Workgroup in terms of the change and its solution, there may be unintended consequences in the drafting that can be eliminated by early review by the IGT UNC Code Administrator);

³ <https://www.igt-unc.co.uk/wp-content/uploads/2020/11/Cross-Code-Working-presentation-v1.0.pdf>

- Implementation dates usually fall outside of the IGT UNC release schedule (and that of most Energy Codes in February, June, and November), therefore these would need to be aligned;
- More official Cross-Code Working Groups are needed to progress Modifications at the same time for greater consistency and efficiency;
- More proactivity rather than reactivity to ensure Cross-Code harmony; and
- Ability for Proposal forms/templates to show explicit early indicators of Cross-Code impacts.

The Workgroup talked at length about the benefits of actively ensuring that proposers think about the impact of their change on other Codes. The Workgroup acknowledged that the current templates go some way to detailing these impacts, however, do not currently have enough emphasis put on them. One Workgroup member showed another Code body's proposal form, which included a tick box whereby proposers were asked to actively consider a list of all other Codes in the impacts section of the report. The Workgroup discussed the benefits to both Administrators and the Industry in considering these links earlier, thereby ensuring that these considerations are incorporated in the solution of the change.

The Workgroup also discussed the introduction of digitisation into the IGT UNC which would give greater possibilities of collaboration. It was discussed how the introduction of digitisation into both the UNC and IGT UNC, to make the Code documents more accessible, could mitigate the need to amalgamate the two. The Workgroup considered how this could be a less contentious option than merging the Codes and how this could aid in easing the resource issues currently faced by the industry, therefore potentially creating an uplift in party engagement in the Codes.

Recommendations

The Panel considers that the current journey from late 2018 to date has not considerably altered the challenges parties are facing with Cross-Code working in the IGT UNC and UNC. Furthermore, through actively reaching out to industry through surveys and Workgroup discussions, industry no longer accepts the position of 2018 and need and expect more efficiency from the Codes.

The Panel noted that to further the current arrangements of cross-code working, it is important that considerations are made to the unique and close relationship that the IGT UNC bares to the UNC in that direct impacts on the Code can cause issues for the industry that may be avoidable. The IGT UNC Panel discussed the idea of cross-code checklists being put in place to ensure that the Code Administrators are carrying out fundamental checks on impacts on either Code. This may be something that the UNC Panel wish to explore in order to gain the efficiencies the industry desires.

The Panel considers that digitisation of the two Codes could benefit parties and Code Administrators. The Panel has noted that discussions within the IGT UNC Workgroups on how the efficiencies of digitisation have produced interest in pursuing digitisation further. The Panel noted that digitisation could relieve the current burdens on resource in the industry faces as seen through our code surveys. The Panel noted that the true value of these efficiencies would only be felt if both codes embraced digitisation together.

