# UNC Modification Panel Minutes of Meeting 278 held on Thursday 21 October 2021 via teleconference

### **Attendees**

### **Voting Panel Members:**

Shipper Representatives	Transporter Representatives	Consumer Representatives
D Fittock (DF), Corona Energy	A Clasper (AC), Cadent	S Hughes (SH), Citizens Advice
D Morley (DMo), Ovo Energy	A Travell (AT), BU-UK C Williams (CW),	E Proffitt (EP), Major Energy Users' Council
M Bellman (MB),	National Grid NTS	
ScottishPower from 12:00	D Mitchell (DM), SGN	
O Chapman (OC), Centrica and on behalf	R Pomroy (RP), Wales & West Utilities	
of M Bellman until	T Saunders (TS), Northern Gas	
R Fairholme (RF), Uniper	Networks	
S Mulinganie (SM), Gazprom Energy		

### Non-Voting Panel Members:

Chairperson	Ofgem Representative	Independent Supplier Representative
W Goldwag (WG), Chair	J Semple (JS)	(None)

### Also, in Attendance:

- A Jackson (AJ), IGT Panel Chair
- B Fletcher (BF), Joint Office
- C Cantle-Jones (CCL), Ovo Energy
- C Aguirre (CA), Pavilion Energy
- D Addison (DA), Xoserve
- E Rogers (ER), Xoserve CDSP Representative

G Evans (GE), Waters Wye Associates

H Moss (HM), Cornwall Insight

K Elleman (KE), Joint Office

M Bhowmick-Jewkes (MBJ), Joint Office

P Garner (PG), Joint Office

P Lucas (PL), National Grid NTS

R Hewitt (RH), Hewitt Home and Energy Solution Ltd

R Streuper (RS), BBL Company

### **Record of Discussions**

#### 278.1 Introduction

The UNC Modification Panel Chair, Wanda Goldwag (WG), welcomed all attendees including new Panel Members, O Chapman (OC), D Morley (DM) and E Proffitt (EP).

### 278.2 Note of any alternates attending the meeting

A Clasper on behalf of G Dosanjh, Cadent

C Williams on behalf of D Lond, National Grid NTS

O Chapman on behalf of M Bellman, ScottishPower until 12:00 pm.

### 278.3 Record of apologies for absence

D Lond, National Grid NTS

G Dosanjh, Cadent

### 278.4 Minutes of the last meeting (16 September 2021)

Panel Members approved the minutes from 16 September 2021.

### 278.5 Review of Outstanding Action(s)

**Action PAN 09/01:** JO (RH) to invite Proposer of Request 0749R to the October Panel to confirm if further workgroup assessment is required

**Update:** K Elleman (KE) advised that the action was not required as the Proposer of Request 0749R was not seeking a Workgroup extension. This matter will be considered in more detail under Agenda item 278.12 (b).

Closed.

### 278.6 Consider Urgent Modifications

a) None

### 278.7 Consider Variation Request

a) None

### 278.8 Final Modification Reports

a) 0760 - Introducing the concept of a derogation framework into Uniform Network Code (UNC)

Panel Discussion: see the Final Modification Report published at:

https://www.gasgovernance.co.uk/0760.

Panel Members considered the Representations made noting that implementation was unanimously supported in the six representations received.

Panel Members agreed that this Modification supported the goal of reaching Net Zero.

R Fairholme (RF) highlighted that a Representation had asked for greater clarity on what derogations were being requested and for tighter controls to be put in place. RF asked if these questions were being addressed.

T Saunders (TS) agreed that clarity and tight controls around derogation requests were required to avoid detrimental impacts on other UNC parties. TS explained that each derogation request would require a Use Case which would set out the clarity and controls required for the request to be approved.

R Pomroy (RP) advised that this Modification was simply the framework to raise derogation requests and included the Use Case criteria to support a derogation request for Net Zero. RP added that this framework could support different derogation requests in the future.

S Mulinganie (SM) agreed with RP's views.

RF accepted this explanation and noted that the time Panel Members would be required to spend on reviewing derogation requests would need to be considered as Panel meetings were already lengthy.

WG noted this and advised the number of future derogation requests would be monitored and Panel Members would be invited to address the issue when appropriate.

Panel Members agreed that this Modification positively impacted Relevant Objectives c) *Efficient discharge of the licensee's obligations* and f) *Promotion of efficiency in the implementation and administration of the Code.* 

Panel members recognised that there was a Cross Code impact and A Jackson (AJ) confirmed that a corresponding IGT UNC Modification had been raised.

RP noted that both the Modification 0760 and its IGT UNC counterpart should be implemented together. Panel Members agreed with this view.

Panel Members then determined (14 Panel votes were available for the determinations):

- There were no new issues requiring a view from Workgroup, by unanimous vote (14 out of 14).
- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are Cross-Code impacts, by unanimous vote (14 out of 14).
- Recommendation to implement Modification 0760, by unanimous vote (14 out of 14).

### b) 0765 - New retrospective debit and credit charges to reflect changes to the treatment of Entry Capacity Revenue between October and December 2020

Panel Discussion: see the Final Modification Report published at:

https://www.gasgovernance.co.uk/0765.

Panel Members considered the Representations made noting that of the 17 Representations received, one Representation offered support and 16 were not in support.

C Williams (CW), the Proposer acknowledged this was a contentious Modification and noted that most of the Representations did not support the retrospective nature of the proposal.

WG highlighted that 16 out of 17 representations not supporting the Modification demonstrated a strong view from the industry.

WG noted that S Hughes (SH) had submitted a statement for Panel Members to review:

"Overall this modification does not clearly demonstrate that the application of credit and debit charges would bring about consumer benefits that would not be outweighed by the impact of perceived regulatory risk. We agree with Ofgem's assertion that it is appropriate to consider any retrospective mods on a case by case basis and believe it is important to test these criteria. On this occasion we do not believe the criteria for retrospection have been met and consider it negative against relevant objective D. However, Ofgem should also consider the overall impact on consumers, including through additional costs as a result of the £47million cross-subsidy arising from the unintended consequences of capacity neutrality arrangements, and how such impacts can be avoided in the future."

SH thanked WG and highlighted that Ofgem should consider the impact on end consumers as a result of this Modification.

Panel Members agreed with this view.

SM noted that that the primary issue with this proposal was whether the criteria for retrospective changes had been met. The Panel noted that this issue had been debated at length in Workgroup and highlighted for the consultation.

SM and RP agreed that the criteria for retrospective changes have not been met. Most Panel Members agreed with this view and were concerned that the approach set out in this Modification for retrospective changes has not been justified against the relevant criteria.

RP noted that seeking retrospective changes is setting a precedent that is not considered to offer benefits to the industry.

RP asked how the retrospective element would work for terminated Shippers and was advised by CW that any credit or liability would pass on to the new Shipper.

Panel Members considered the Relevant Objectives. RF noted that the impacts on Relevant Objective d) and Charging Objective c) were more important than the others as implementing this Modification would create a precedent for the use of retrospectivity which would reduce certainty for the industry and the negative impacts against these would outweigh any other benefits established against other Relevant Objectives.

Panel Members agreed that the implementation of this Modification did not support Relevant Objective d) Securing of effective competition between Shippers and/or Suppliers and Charging Objective c) facilitates effective competition between gas shippers and between gas suppliers.

Panel Members then determined (14 Panel votes were available for the determinations):

- There were no new issues requiring a view from Workgroup, by unanimous vote (14 out of 14).
- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are no Cross-Code impacts, by unanimous vote (14 out of 14).
- Recommendation to not implement Modification 0765, by majority vote (13 out of 14).

### c) 0772S - Transparency Improvements to the Process for Changing Gas Quality Limits in NTS Connection Agreements

Panel Discussion: see the Final Modification Report published at:

https://www.gasgovernance.co.uk/0772.

Panel Members considered the Representations made noting that implementation was supported in the single representation received.

Panel Members agreed that this Modification positively impacted Relevant Objectives d) Securing of effective competition between relevant Shippers and f) Promotion of efficiency in the implementation and administration of the Code.

Panel Members then determined (14 Panel votes were available for the determinations):

- There were no new issues requiring a view from Workgroup, by unanimous vote (14 out of 14).
- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are no Cross-Code impacts, by unanimous vote (14 out of 14).
- Modification 0772S to be implemented by unanimous vote (14 out of 14).

### d) 0775S - Amendment to the Requirement to Conduct the Transporting Britain's Energy Consultation

Panel Discussion: see the Final Modification Report published at:

https://www.gasgovernance.co.uk/0775.

Panel Members considered the Representations made noting that implementation was supported in the single representation received.

RP noted that this Modification would result in efficiency and resource savings that would benefit National Grid NTS.

Panel Members agreed that this Modification positively impacted Relevant Objective f) *Promotion of efficiency in the implementation and administration of the Code.* 

Panel Members then determined (14 Panel votes were available for the determinations):

- There were no new issues requiring a view from Workgroup, by unanimous vote (14 out of 14).
- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are no Cross-Code impacts, by unanimous vote (14 out of 14).
- Modification 0775S to be implemented by unanimous vote (14 out of 14).

### 278.9 Consider New, Non-Urgent Modifications

### a) 0781R - Review of the Unidentified Gas process

G Evans (GE) introduced this Request, explaining that it is proposing a review of the process for allocating Unidentified Gas.

WG asked Panel Members to consider whether the scope of this review was too narrow or too broad.

D Mitchell (DM) noted that there was a risk that this review group was duplicating work being carried out by the AUG Sub-committee. GE disagreed with this view explaining that the scope of this review was outside that of the AUG Sub-committee.

SM agreed with GE and noted that this review was a strategic review looking to make changes to the overall process for allocation of UIG.

KE noted that the timetable for the Review Workgroup was quite short and asked if it was realistic considering ongoing industry events. GE agreed the timetable proposed was quite ambitious.

WG suggested the Workgroup Report should be submitted to Panel in six months (April 2022), which was accepted by Panel Members.

For Request 0781R Members determined (14 Panel votes were available for the determinations):

- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are Cross-Code impacts, by unanimous vote (14 out of 14).
- Request 0781R is to be issued to Workgroup 0781R with a report by the 21 April 2022 Panel, by unanimous vote (14 out of 14).

### b) 0782 - Creation of Independent AUGE Assurer (IAA) role

GE presented this Modification, noting that it is proposing to create an independent assurance role to verify that the output of the Allocation of Unidentified Gas Expert (AUGE) process complies with the "Framework for the Appointment of an Allocation of Unidentified Gas Expert". The Uniform Network Code Committee (UNCC) will be required to act on any material non-compliance that is ascertained by the Independent AUGE Assurer (IAA).

GE explained that the proposal was that the IAA would be able to review and audit the work and assumptions made by the AUGE as well as address any concerns around their work. GE added that a formal escalation process to the UNCC was also being proposed.

E Rogers (ER) advised that initial conversations around this proposal had taken place and Xoserve, as the CDSP (Central Data Service Provider) would carry out a procurement exercise for the IAA once the Workgroup had defined the scope of the role.

SH noted that whilst a Review of the UIG process was being carried out under Review 0781R, it felt inappropriate for this Modification to change the AUG process simultaneously. SH highlighted that it was concerning from a governance perspective as the Modification could prejudice the outcome of the Review.

GE explained that the Review would be looking at options for how the UIG process could be improved but it would not be implementing any solutions. GE noted that whilst the Review group should work fast, any change that it proposed could potentially take a long time to be implemented. This Modification however will be addressing a specific concern that has been raised by the industry and acknowledged by Ofgem and its aim is to make short-term improvements. Therefore, GE advised that there was no conflict between the Review and the

Modification being raised in parallel.

D Fittock (DF) agreed with this explanation and noted that discussions in UNCC around commercial concerns from various UNC parties were being addressed through this Modification and added that there were no governance precedents that two related Modifications and/or Review groups could not be progressed together.

A Travell (AT) noted that whilst he had similar concerns as SH, he acknowledged the comments made by GE and DF.

ER clarified that if this Modification was to be developed, the process would be lengthy, and the new IAA would not be in place before Gas Year 2023 at the earliest.

WG confirmed to SH that the Proposers were entitled to raise both Review and Modification at the same time.

TS noted that the Governance statement in the Modification needed to be clarified and amended. DF accepted this and clarified it was proposed that this Modification was subject to Authority Direction.

TS also asked whether the AUGE contract could be amended midway. ER explained there was a clause in the AUGE contract which allowed for a variation to be made to it but noted this depended on the materiality of the variation.

SM added that the AUGE Framework at present is unable to make changes to the AUGE's contract or offer any remedy if there are concerns with the AUGE's output. SM noted that this Modification was proposing a process to escalate and deal with any issues in relation to the work the AUGE had carried out.

### **Panel Questions:**

- 1. Identification of potential impacts on other energy codes.
- 2. Consider alignment of other work being carried out in respect of AUGE process.

For Modification 0782 Members determined (14 Panel votes were available for the determinations):

- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are Cross-Code impacts by unanimous vote (14 out of 14).
- The criteria for Self-Governance is not met, as this Modification is likely to have a material effect on 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, by unanimous vote (14 out of 14).
- Modification 0782 is to be issued to Workgroup 0782 with a report by the 17 February 2022 Panel, by majority vote (12 out of 14).

### c) 0783R - Review of AQ Correction Process

A Clasper (AC) provided a presentation explaining that this Request is proposing a review of the Annual Quantity (AQ) correction processes which are set out within the UNC. This review should assess whether the current arrangements meet the objectives for the setting of the AQ and identify and consider possible amendments that are required to UNC.

SM suggested that because of operational constraints in the industry it may not be possible to progress this Review according to the proposed timetable.

AC accepted this suggestion and noted that he was willing to extend the timetable.

WG proposed nine months for the Review to be concluded. Panel Members agreed for the Review group to report back to Panel in July 2022.

AC suggested the Workgroup could be combined with the 0778R Workgroup.

SM asked whether the first Workgroup could be delayed until other ongoing urgent industry issues had been addressed. AC agreed to this request and noted he would liaise with the Joint Office to consider whether the Workgroup could be delayed for a specific period.

For Request 0783R Members determined (14 Panel votes were available for the determinations):

- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are potential Cross-Code impacts by unanimous vote (14 out of 14).
- Request 0783R is to be issued to Workgroup 0783R with a report to be presented to the July 2022 Panel, by unanimous vote (14 out of 14).

### d) 0784 - Transition to the Central Switching Service and the Retail Energy Code v3.0

D Addison (DA) presented this Modification, explaining that it details the transitional arrangements that will be required to the UNC in order to implement the Central Switching Service (CSS) and transition to the Retail Energy Code version 3.0 (REC v3). This Modification will assist the technical transition of mastering data items (including the Registration) from UNC to REC.

TS highlighted that in theory, as this Modification is related to the SCR (Significant Code Review), it should follow Authority Direction procedures. TS asked if Ofgem could confirm whether the Modification could therefore follow Self-Governance procedures which were being proposed.

J Semple (JS) reviewed this matter offline and advised the Panel that Ofgem were satisfied that this Modification met the Self-Governance criteria.

For Modification 0784 Members determined (14 Panel votes were available for the determinations):

- It is related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are Cross-Code impacts, by unanimous vote (14 out of 14).
- The criteria for Self-Governance is met, as this Modification is unlikely to have a material effect on 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, by unanimous vote (14 out of 14).
- Modification 0784S is to be issued to Workgroup 0784 with a report to be presented to the 17 February 2022 Panel, by unanimous vote (14 out of 14).

### e) 0785 - Application of UNC processes to an aggregated Bacton (exit) Interconnection Point

C Williams (CW) provided a presentation noting that this Modification is seeking to clarify how UNC processes would be applied to an aggregated Bacton (exit) Interconnection Point (IP).

For Modification 0785 Members determined (14 Panel votes were available for the determinations):

- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are no Cross-Code impacts, by unanimous vote (14 out of 14).
- The criteria for Self-Governance is not met, as this Modification is likely to have a material effect on 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, by unanimous vote (14 out of 14).
- Modification 0785 is to be issued to Workgroup 0785 with a report by the 20 January 2022 Panel, by unanimous vote (14 out of 14) – see paragraph below for new reporting date.

n.b CW advised the Joint Office post Panel that the reporting date for 0785 would be 16 December 2021 and not 20 January 2022.

### f) 0786 - Amendment of the framework for the Bacton exit pressure service to interconnectors

CW presented this Modification, explaining that it is an enabling modification which will allow National Grid to provide a consistent pressure service to interconnectors off-taking gas at Bacton.

For Modification 0786 Members determined (14 Panel votes were available for the determinations):

- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are no Cross-Code impacts, by unanimous vote (14 out of 14).
- The criteria for Self-Governance is met, as this Modification is unlikely to have a material effect on 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, by unanimous vote (14 out of 14).
- Modification 0786S is to be issued to Workgroup 0786 with a report to be presented to the 17 February 2022 Panel, by unanimous vote (14 out of 14) – see paragraph below for new reporting date

n.b CW advised the Joint Office post Panel that the reporting date for 0786 would be 20 January 2022 and not 17 February 2022.

### g) 0787 - Introducing amendments to the interconnection agreement with Interconnector Limited to reflect latest operational standards and practices

CW provided a presentation noting that this is an enabling Modification which will allow National Grid to amend the interconnection agreement (IA) with Interconnector Limited (IL). This will allow the IA to reflect latest standards and practices in gas quality and general operations.

For Modification 0787 Members determined (14 Panel votes were available for the determinations):

- It is not related to the Significant Code Review, by unanimous vote (14 out of 14).
- There are no Cross-Code impacts, by unanimous vote (14 out of 14).
- The criteria for Self-Governance is met, as this Modification is unlikely to have a material effect on 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, by unanimous vote (14 out of 14).
- Modification 0787S is to be issued to Workgroup 0787 with a report to be presented to the 17 February 2022 Panel, by unanimous vote (14 out of 14) – see paragraph below for new reporting date

n.b CW advised the Joint Office post Panel that the reporting date for 0786 would be 20 January 2022 and not 17 February 2022.

PG informed Panel that Modifications 0785, 0786S and 0787S would be reviewed under the Transmission Workgroup which was very busy and would be held over two days each month.

CW advised the Joint Office post Panel that the reporting dates for Modifications 0785, 0786S and 0787S would be different to those agreed above:

Modification 0785: 16 December 2021

Modifications 0786S and 0787S: 20 January 2022

### 278.10 Existing Modifications for Reconsideration

- a) 0687 Creation of new charge to recover Last Resort Supply Payments
- b) 0751 Capping price increases for Long-Term Entry Capacity
- c) 0753 Removal of Pricing Disincentives for Secondary Trading of Fixed Price NTS System Entry Capacity

PG noted that Ofgem was due to provide a decision on these Modifications by 29 October 2021 and asked whether Ofgem were still minded to make a decision by this date.

JS advised the following dates for Ofgem's decision:

Modification 0687: End of 2021

Modification 0751: 26 November 2021

Modification 0753: 29 October 2021

- d) 0696V Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs
- e) 0746 Application of Clarificatory change to the AQ amendment process within TPD G2.3 from 1st April 2020

PG noted that no decision due date had been provided by Ofgem for the above Modifications and asked if Ofgem could advise by when they were minded to make a decision.

JS advised Ofgem would make a decision on these Modification in 2022 (date unspecified).

### 278.11 Workgroup Issues

a) None

### 278.12 Workgroup Reports for Consideration

### a) Request 0705R - NTS Capacity Access Review

Panel Members noted that the Workgroup was due to report at Panel this month.

KE noted that due to several Modifications within the Transmission Workgroup, a few topics within the 0705R Workgroup still needed to be addressed. As a result, this Workgroup was requesting a two-month extension with a report by the December 2021 Panel.

### b) Request 0749R - Increased DM SOQ Flexibility

KE advised that because of a lack of engagement, very little progress has been made in this Workgroup. The Proposer had indicated that he was hoping an industry party would raise a related Modification, but this has not occurred.

KE noted that the Proposer had been invited to attend Panel if he wanted the Workgroup to be extended. The Proposer and Workgroup Chair for 0749R recommended that this Request Workgroup be closed, Panel Members agreed to close this Request Workgroup.

For Request 0749R, Members determined (14 Panel votes were available for the determinations):

• Request 0749R to be closed by unanimous vote (14 out of 14).

### c) Modification 0761 - Arrangements for Interconnectors with additional Storage capability

Panel Members noted the Workgroup Report recommendation that this Modification should be issued to Consultation.

SH noted that there were some contentious issues discussed at Workgroup and suggested that it would be beneficial to add some specific consultation questions.

RP agreed that the Proposal was contentious as it suggested combining Storage and Interconnectors and asked whether the consultation period should be extended.

RF explained that the contentious element of this Modification was whether or not the Proposal itself was legal, noting that this issue would need to be addressed when Panel reviewed the Final Modification Report.

SM noted that the Workgroup had discussed the legal position at length and agreed that the consultation period should be extended to allow all parties to acquire and consider legal opinion.

### Panel Questions for Consultation:

- 1. Do any legal points need to be considered which are relevant to Modification 0761?
- 2. Do you have any views in relation to the delivery costs and potential benefits associated with delivering this solution?
- 3. Do you have any views as to whether implementation will increase overall NTS throughput volumes?
- 4. Please explain whether you believe this solution has any impacts on other available storage services

It was agreed that Consultation would be for 20 days, and the Final Modification Report would be considered at the December 2021 UNC Modification Panel.

For Modification 0761, Members determined (14 Panel votes were available for the determinations):

 Modification 0761 to be issued to consultation with a close out date of 19 November 2021 and to be considered at the 16 December 2021 Panel, by unanimous vote (14 out of 14).

## d) Modification 0771S - Removal of the absolute requirement to include a Remotely Operable Valve (ROV) Installation for all new NTS Entry connections

Panel Members noted that the Workgroup was due to report at Panel this month, but the Workgroup is requesting a two month extension with a report by the December 2021 Panel as it is awaiting response from HSE around Materiality.

### e) Modification 0776S – Revision of the Modification Panel Meeting Location Requirement in the Modification Rules

Panel Members noted the Workgroup Report recommendation that this Modification should be issued to Consultation.

It was agreed that Consultation would be for 15 days and the Final Modification Report would be considered at short notice at the November 2021 UNC Modification Panel.

For Modification 0776S, Members determined (14 Panel votes were available for the determinations):

 Modification 0776S to be issued to consultation with a close out date of 11 November 2021 and considered at short notice at the 18 November 2021 Panel, by unanimous vote (14 out of 14).

### 278.13 Consideration of Workgroup Reporting Dates and Legal Text Requests

Panel Members determined unanimously to extend the following Workgroup reporting date(s), recorded here with some additional data:

Modification number and title	Current Panel reporting date	Requested Panel reporting date	Reason for request to change Panel reporting date/Comments
0705R - NTS Capacity Access Review	October 2021	December 2021	2 Month Extension Requested – Workgroup requires additional time for the report to be concluded
0754R - Investigate Advanced Analytic Options to improve NDM Demand Modelling	November 2021	November 2022	12 Month Extension Requested – Workgroup requires additional time for the analysis to be completed
0771S - Removal of the absolute requirement to include a Remotely Operable Valve (ROV) Installation for all new NTS Entry connections	October 2021	December 2021	2 Month Extension Requested – Awaiting response from HSE around Materiality
0777 - Removal of Obstacles to Market Withdrawal	November 2021	December 2021	1 Month Extension Requested – Workgroup Report date deferred to confirm whether justification for Modification still exists

SM noted Modification 0767 will be withdrawn in light of 0781R and Modification 0782.

PG asked SM to submit a formal withdrawal request to the Joint Office so a Withdrawal Notice can be issued for Modification 0767.

### **Legal Text Requests**

UNC Modification Panel Members discussed Legal Text Requests and determined unanimously to make a deemed Legal Text Requests for Modification 0785.

Post Panel CW advised the Joint Office that National Grid NTS did not accept the deemed Legal Text Request as Modification 0785 is not fully developed and to therefore deem it that the Legal Text is requested would be premature. The Legal Text for 0785 will be requested at a later date once it had been reviewed at Workgroup.

#### 278.14 AOB

### a) IGT Cross Code Impact Assessment

RP explained he had been attending the IGT UNC Panel as an observer as Distribution Network Operators (DNs) want to build a relationship between the UNC and IGT UNC parties.

RP advised that subsequently closer working practices have been agreed between the IGT and UNC Code Administrators to enable earlier and better identification of Cross Code impacts.

RP expressed his hope that this would allow administration issues between the two Codes to improve.

RP added that Cross Code Workgroups have also been discussed and may enable some of the current issues being experienced to be addressed.

PG noted that the Joint Office will:

- include a formal Cross Code impact vote for the UNC Modification Panel determinations.
- continue to include the IGT UNC Representative at Panel and other UNC Workgroups.
- actively try to identify any IGT impacts.

AJ thanked PG for the changes being implemented and noted she would report back to the IGT UNC Panel and provide any feedback received.

### b) Joint Office New Company Update

PG advised there was no progress on this, noting that JGAC were still working on their response to Ofgem. PG added that Ofgem have said they will require 90-days to respond for due process.

PG advised that once there was an update, she would inform Panel Members. WG noted that this was likely to be in early 2022. PG agreed with this view.

### c) Future Meetings Proposal (Action PAN 08/01)

KE advised that the Joint Office had requested Panel Members for views on future meetings and received varying responses.

WG had suggested that there should be one face to face meeting per quarter with online attendance by exception, whilst remaining meetings continue virtually.

KE added that Committee and Workgroup meetings will continue virtually with a review in three to six months.

It was proposed that the December Panel meeting could be a in person meeting in Solihull as the new Joint Office premises are COVID secure with adequate parking spaces.

Panel Members discussed this proposal. Some Panel Members highlighted the issue of rising COVID cases across the UK and their organisation's no-travel policies.

Panel Members agreed to continue with virtual meetings at present.

#### d) UNC Modification Panel Chair tenure

PG advised that Ofgem have confirmed the extension of WG's tenure as the UNC Modification Panel Chair, noting that WG will commence her second term from 1 January 2022.

### e) Extraordinary Panel for Urgent Modifications

PG provided an update on the Urgent Modifications advising that two Extraordinary Panels have been arranged to accommodate them:

- Modification 0788: Friday 22 October 2021 at 2:00 pm
- Modification 0789: TBC depending on Ofgem decision on Urgency.

SH asked if both Modifications had been submitted together why Ofgem had not made their decision on them at the same time. PG clarified the Urgency Request process and confirmed that both Modifications had been sent to Ofgem at the same time.

### 278.15 Date of Next Meeting(s)

14:00, Friday 22 October 2021, by teleconference (extraordinary meeting)

10:00, Thursday 18 November 2021, by teleconference

### Action Table (21 October 2021)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update	Date of Expected update
PAN 09/01	16/09/21	277.13	October Panel to confirm if further	Joint Office (RH)	Closed	October 2021

iii iavoui	Favour	Present	
iii iavoui	Favour	Present	Cast
In favour	Not in		No Vote

In favour	Not	
III Iavoui	Present	
<b>~</b>	Х	NP

Mod	Modification	Vote Outcome		Shi	pper Voti	ng Memb	ers		Transporter Voting Members				s	IGT Voting Member	Consumer Voting Member	Non-Domestic Consumer Voting Member	Recommende	Determination Sought
Туре	cuiicuicii	vote suitonine	DF	DM	OC till 12pm / MB	ОС	RF	SM	cw	AC	DM	RP	TS	AT	SH	EP	d Workgroup	Determination obtigin
		No new issues were identified during the consultation	x	x	x	x	x	x	x	х	x	х	х	х	х	X		Were any new issues identified during the Consultation?
FMR	0760 - Introducing the concept of a derogation framework into	This Modification is not related to the Significant Code Review	х	х	х	х	х	х	х	х	х	х	х	х	х	х		Does this Modification impact a Significant Code Review?
M∃	Uniform Network Code (UNC)	Cross Code Impacts identified	*	*	*	*	*	*	*	~	*	~	~	~	~	*		Are there any Cross Code Impacts (IGT UNC)?
		Modification is to be implemented	*	*	*	*	*	*	*	~	*	~	~	~	~	*		Should this Modification be implemented? (Yes, votes only)
		No new issues were identified during the consultation	х	x	x	x	х	х	х	х	х	х	х	х	х	х		Were any new issues identified during the Consultation?
FMR	0765 - New retrospective debit and credit charges to reflect changes to the treatment of	This Modification is not related to the Significant Code Review	x	x	x	x	x	x	х	х	х	х	х	х	х	х		Does this Modification impact a Significant Code Review?
H N	Entry Capacity Revenue between October and December 2020	No Cross Code Impacts identified	х	x	x	x	х	х	х	х	х	х	х	х	х	х		Are there any Cross Code Impacts (IGT UNC)?
		Modification is to not be implemented	x	x	x	x	x	x	*	х	x	х	х	х	х	х		Should this Modification be implemented? (Yes, votes only)
		No new issues were identified during the consultation	х	х	х	х	х	х	х	х	х	х	х	х	х	х		Were any new issues identified during the Consultation?
ЛR	0772S - Transparency Improvements to the Process	This Modification is not related to the Significant Code Review	х	х	х	х	х	х	х	х	х	х	х	х	х	х		Does this Modification impact a Significant Code Review?

In favour	Not in	Not	No Vote
III lavoui	Favour	Present	Cast
<	Х	NP	NV

In favour	Not	
iii iavoui	Present	
<b>~</b>	Х	NF

Mod	Modification	Vote Outcome		Shi	pper Voti	ng Memb	ers			Transport	er Voting	g Member	s	IGT Voting Member	Consumer Voting Member	Non-Domestic Consumer Voting Member	Recommende	Determination Sought
Туре			DF	DM	OC till 12pm / MB	ос	RF	SM	cw	AC	DM	RP	TS	AT	SH	EP	d Workgroup	
F	Limits in NTS Connection Agreements	No Cross Code Impacts identified	x	x	x	x	x	х	х	х	x	х	х	х	х	х		Are there any Cross Code Impacts (IGT UNC)?
		Modification is to be implemented	>	<b>&gt;</b>	<b>&gt;</b>	<b>&gt;</b>	*	•	•	•	*	•	•	•	•	•		Should this Modification be implemented? (Yes, votes only)
		No new issues were identified during the consultation	x	x	x	x	x	х	х	х	x	х	х	х	х	х		Were any new issues identified during the Consultation?
FMR	0775S - Amendment to the Requirement to Conduct the	This Modification is not related to the Significant Code Review	х	х	х	х	х	x	x	x	x	х	х	х	x	х		Does this Modification impact a Significant Code Review?
<u> </u>	Transporting Britain's Energy Consultation	No Cross Code Impacts identified	х	х	х	х	х	х	х	х	x	х	х	х	x	х		Are there any Cross Code Impacts (IGT UNC)?
		Modification is to be implemented	*	*	*	*	*	~	~	*	*	•	~	~	~	*		Should this Modification be implemented? (Yes, votes only)
		This Request is not related to the Significant Code Review	х	х	х	х	х	х	х	х	x	х	х	х	x	х		Does this Request impact a Significant Code Review?
New Request	0781R - Review of the Unidentified Gas process	Cross Code Impacts identified	*	*	*	*	*	*	*	*	*	•	~	~	•	*		Are there any Cross Code Impacts (IGT UNC)?
Z		Request is to be issued to Workgroup	>	>	>	<b>&gt;</b>	<b>&gt;</b>	*	*	*	*	•	*	•	•	*	Distribution	Should this Request be issued to Workgroup with a report to be presented to the April 2022 Panel?
		This Modification is not related to the Significant Code Review	x	x	x	x	x	х	х	х	х	х	х	х	х	х		Does this Modification impact a Significant Code Review?

<	Х	NP	NV
III lavoui	Favour	Present	Cast
In favour	Not in	Not	No Vote

In favour	Not	
iii iavoai	Present	
<b>~</b>	Х	NF

Mod	Modification	Vote Outcome		Shi	pper Voti	ing Memb	ers			Transport	er Votinç	j Member	s	IGT Voting Member	Consumer Voting Member	Non-Domestic Consumer Voting Member	Recommende	
Туре	incumoust.	rote suitonile	DF	DM	OC till 12pm / MB	ос	RF	SM	cw	AC	DM	RP	TS	АТ	SH	EP	d Workgroup	
New Mod	0782 - Creation of Independent	Cross Code Impacts identified	*	>	*	•	<b>&gt;</b>	*	*	•	<b>&gt;</b>	*	*	*	*	*		Are there any Cross Code Impacts (IGT UNC)?
New	AUGE Assurer (IAA) role	Is not a Self-Governance Modification	х	х	х	x	х	х	х	х	х	х	х	х	х	х		Does this Modification meet the Self- Governance Criteria?
		Modification is to be issued to Workgroup	<b>&gt;</b>	x	<b>&gt;</b>	*	<b>&gt;</b>	*	*	•	<b>&gt;</b>	•	*	•	х	•	Distribution	Should this Modification be issued to Workgroup with a report to be presented to the 17 February 2022 Panel?
		This Request is not related to the Significant Code Review	x	x	x	х	x	х	х	х	х	х	х	х	х	х		Does this Modification impact a Significant Code Review?
New Request	0783R – Review of AQ Correction Process	Cross Code Impacts identified	>	>	>	•	*	~	~	•	*	~	~	~	•	*		Are there any Cross Code Impacts (IGT UNC)?
2		Request is to be issued to Workgroup	<b>&gt;</b>	>	<b>&gt;</b>	•	<b>&gt;</b>	*	*	•	<b>&gt;</b>	~	*	•	•	*	TBC	Should this Request be issued to Workgroup with a report to be presented to the July 2022 Panel?
		This Modification is related to the Significant Code Review	>	>	<b>&gt;</b>	*	<b>&gt;</b>	*	*	•	*	~	*	•	•	*		Does this Modification impact a Significant Code Review?
New Mod	0784 - Transition to the Central Switching Service and the	Cross Code Impacts identified	<b>&gt;</b>	<b>&gt;</b>	<b>&gt;</b>	*	<b>&gt;</b>	*	*	•	<b>&gt;</b>	•	*	•	•	*		Are there any Cross Code Impacts (IGT UNC)?
New	Retail Energy Code v3.0	Is a Self-Governance Modification	*	*	<b>&gt;</b>	*	*	*	*	•	*	•	*	•	•	•		Does this Modification meet the Self- Governance Criteria?

~	Х	NP	NV
III Iavoui	Favour	Present	Cast
In favour	Not in	Not	No Vote

~	Х	NF
III lavoui	Present	
In favour	Not	

Mod	Modification	Vote Outcome		Shi	pper Voti	ng Memb	ers		-	Transport	er Voting	J Member	s	IGT Voting Member	Consumer Voting Member	Non-Domestic Consumer Voting Member	Recommende	
Туре	mounicale.	vote suitesine	DF	DM	OC till 12pm / MB	ос	RF	SM	cw	AC	DM	RP	TS	AT	SH	EP	d Workgroup	
		Modification is to be issued to Workgroup	<b>&gt;</b>	*	<b>&gt;</b>	<b>&gt;</b>	*	*	*	*	*	•	•	•	•	•	Distribution	Should this Modification be issued to Workgroup with a report to be presented to the 17 February 2022 Panel?
		This Modification is not related to the Significant Code Review	x	х	x	x	х	х	X	х	x	х	х	х	х	х		Does this Modification impact a Significant Code Review?
New Mod	0785 - Application of UNC processes to an aggregated	No Cross Code Impacts identified	х	х	x	х	х	х	x	х	х	х	х	х	х	х		Are there any Cross Code Impacts (IGT UNC)?
New	Bacton (exit) Interconnection Point	Is not a Self-Governance Modification	x	х	x	X	х	х	X	х	x	х	х	х	х	x		Does this Modification meet the Self- Governance Criteria?
		Modification is to be issued to Workgroup	<b>&gt;</b>	*	<b>&gt;</b>	<b>&gt;</b>	*	*	<b>&gt;</b>	*	<b>&gt;</b>	•	*	•	•	•	Transmission	Should this Modification be issued to Workgroup with a report to be presented to the 16 December 2021 Panel?
		This Modification is not related to the Significant Code Review	x	х	х	x	х	х	x	х	x	х	х	х	х	х		Does this Modification impact a Significant Code Review?
New Mod	0786 - Amendment of the framework for the Bacton exit	No Cross Code Impacts identified	х	х	х	х	х	х	х	х	х	х	х	х	х	x		Are there any Cross Code Impacts (IGT UNC)?
New	pressure service to interconnectors	Is a Self-Governance Modification	*	•	*	*	•	•	*	•	*	•	•	•	•	•		Does this Modification meet the Self- Governance Criteria?
		Modification is to be issued to Workgroup	*	*	*	*	*	*	*	*	*	*	*	*	*	•	Transmission	Should this Modification be issued to Workgroup with a report to be presented to the 20 January 2022 Panel?

~	Х	NP	NV
III lavoui	Favour	Present	Cast
In favour	Not in	Not	No Vote

In favour	Not	
iii iavoui	Present	
<b>~</b>	Х	NF

Mod	Modification	Vote Outcome		Shi	ipper Vot	ing Memb	pers			Transport	er Voting	g Members	s	IGT Voting Member	Consumer Voting Member	Non-Domestic Consumer Voting Member	Recommende	Determination Sought
Туре	Wodification	vote Outcome	DF	DM	OC till 12pm / MB	ос	RF	SM	cw	AC	DM	RP	TS	AT	SH	EP	d Workgroup	
		This Modification is not related to the Significant Code Review	х	x	х	х	х	x	x	x	x	х	х	х	х	х		Does this Modification impact a Significant Code Review?
Mod	0787 - Introducing amendments to the interconnection agreement	No Cross Code Impacts identified	x	х	х	х	х	х	х	х	х	х	х	х	х	х		Are there any Cross Code Impacts (IGT UNC)?
New	with Interconnector Limited to reflect latest operational standards and practices	ls a Self-Governance Modification	*	*	*	•	*	*	•	•	•	*	~	~	~	*		Does this Modification meet the Self- Governance Criteria?
		Modification is to be issued to Workgroup	*	<b>&gt;</b>	•	~	~	~	~	~	•	~	~	~	~	*	Transmission	Should this Modification be issued to Workgroup with a report to be presented to the 20 January 2022 Panel?
WG Report	0749R - Increased DM SOQ Flexibility	Request to be closed	*	*	•	•	•	•	•	•	*	•	*	*	•	*		Should this Request be closed?
WG Report	0761 - Arrangements for Interconnectors with additional Storage capability	Modification to be issued to consultation	*	*	*	*	~	*	*	*	*	~	*	~	~	•		Should this Modification be issued for Consultation with a 20 day consultation period closing on 19 November 2021 and be considered at the 16 December 2021 Panel?
WG Report	0776S – Revision of the Modification Panel Meeting Location Requirement in the Modification Rules	Modification to be issued to consultation	*	<b>&gt;</b>	*	*	•	*	*	*	*	•	*	*	•	*		Should this Modification be issued for Consultation with a 15 day consultation period closing on 11 November 2021 and be considered at short notice at the 18 November 2021 Panel?
WG Extension	0705R - NTS Capacity Access Review	Workgroup extension Approved	•	*	*	*	~	*	*	*	~	*	~	•	•	•		Should the reporting date for this Workgroup be extended to December 2021 Panel?

Favour Present	Cast
y ND	NV

Note definition of Defined Term "Panel Majority" in the Mod Rules 2.1.

FMR implementation votes should record either in favour or not present (or be blank) Mod Rules 9.4(b)

In favour	Not	
III lavoui	Present	
<b>~</b>	Х	NP

Mod	Modification	Vote Outcome		Sh	ipper Vot	ing Memb	ers			Transport	er Voting	) Member	s	IGT Voting Member	Consumer Voting Member	Non-Domestic Consumer Voting Member	Recommende	Determination Sought
Туре	wounteacon	vote outcome	DF	DM	OC till 12pm / MB	ОС	RF	SM	cw	AC	DM	RP	TS	AT	SH	EP	d Workgroup	
WG Extension	0754R - Investigate Advanced Analytic Options to improve NDM Demand Modelling	Workgroup extension Approved	*	*	•	*	*	•	*	•	<b>&gt;</b>	•	•	•	*	*		Should the reporting date for this Workgroup be extended to November 2022 Panel?
WG Extension	0771S - Removal of the absolute requirement to include a Remotely Operable Valve (ROV) Installation for all new NTS Entry connections	Workgroup extension Approved	<b>&gt;</b>	*	*	*	*	•	*	•	*	*	•	*	*	*		Should the reporting date for this Workgroup be extended to December 2021 Panel?
WG Extension	0777 - Removal of Obstacles to Market Withdrawal	Workgroup extension Approved	*	*	•	*	*	•	*	•	*	•	•	•	*	•		Should the reporting date for this Workgroup be extended to December 2021 Panel?

Not No Vote Not in In favour Favour Present Cast **✓** X NP NV

Note definition of Defined Term "Panel Majority" in the Mod Rules 2.1.

FMR implementation votes should record either in favour or not present (or be blank) Mod Rules 9.4(b)

In favour Present NP