

UNC Code Reform BAU Readiness & Integration Workgroup Minutes
Wednesday 25 March 2026
via Microsoft Teams

Attendees		
Mark Cockayne (Chair)	(MC)	Joint Office
Ali Wellings (Secretary)	(AW)	Joint Office
Aleksis Butler	(ABu)	BUUK
Amrik Bal	(ABa)	Joint Office
Andy Clasper	(AC)	Cadent Gas
Ben Mitchell	(BMi)	CDSP
Edward Allard	(EA)	Cadent
Ellie Rogers	(ER)	CDSP
Helen Bennett	(HB)	Joint Office
Helen Chandler	(HCh)	Northern Gas Networks
Helen Cuin	(HC)	Joint Office
Helen Gilbert	(HG)	NESO
Jenny Rawlinson	(JR)	BUUK
Kate Elleman	(KE)	Joint Office
Kathryn Adeseye	(KA)	CDSP
Kris Jacob	(KJ)	National Gas Transmission
Marina Papatoma	(MP)	Wales and West Utilities
Michelle Flanagan	(MF)	Joint Office
Nicola Lond	(NL)	National Gas Transmission
Shaliece Benjamin	(SB)	Joint Office
Tom Jenkins	(TJ)	Indigo Networks
<p><i>This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.</i></p> <p><i>Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: https://www.gasgovernance.co.uk/codereform/bau/250326</i></p>		

1. Introduction

Mark Cockayne (MC) welcomed all parties to the meeting. The meeting was noted as not quorate, as there were insufficient Shipper representatives present.

1.1. Approval of Late Papers

The Workgroup were advised that all papers had been issued late. It was noted that a number of templates had been published for review, which would be discussed during the meeting.

1.2. Review of Outstanding Actions

There were no outstanding actions.

2. Matters for Workgroup Consideration

2.1 Terms of Reference

Kate Elleman (KE) presented the Terms of Reference (ToR) and provided background on the establishment of the Workgroup. For more information, the document can be found here: [Code Reform: BAU Readiness & Integration Workgroup 25 March 2026 | Joint Office of Gas Transporters - Gas Governance](#).

KE explained that the Workgroup had been created to focus specifically on BAU readiness, ensuring that existing UNC governance arrangements continue to operate effectively during the transition to the future Code Manager model.

KE outlined that Ofgem's Code Reform programme is being delivered in two phases: firstly, the introduction of Code Managers across all energy codes, and secondly, the implementation of interim changes ahead of Code Manager appointment. KE noted that a number of these interim changes, such as the Modification Prioritisation Process, will directly impact current Code Administrators and therefore BAU activities.

KE further highlighted that there are a number of existing contractual and governance arrangements under the UNC which will require consideration over the next two years, given that responsibility for these arrangements may ultimately transfer to a future Code Manager. KE emphasised that the purpose of this Workgroup is to maintain oversight of these BAU impacts, ensuring continuity and stability, while avoiding overlap with Code Manager design or collaboration workstreams.

KE introduced the draft ToR and proposed a minor amendment to expand the scope to include "arrangements" alongside governance processes. KE also noted that the responsibilities section would likely evolve over time as the Workgroup begins to identify and prioritise relevant topics for discussion.

KE reminded the Workgroup that it had previously been agreed that the Workgroup would operate as an open forum, allowing broader industry participation, and that it would not have decision-making powers. Instead, the Workgroup would identify impacts, discuss issues, and make recommendations to the appropriate governance forums (e.g. Panel, PAC, DSC Change Committee), where formal decisions would be taken.

The Workgroup discussed the importance of clearly defining the scope of the Workgroup, particularly in relation to excluding Code Manager-related activities. Jenny Rawlinson (JR) suggested that an explicit "out of scope" section should be included within the ToR to clearly set boundaries and avoid ambiguity. KE agreed that this would provide clarity and help manage expectations.

Edward Allard (EA) queried how the Workgroup would interact with Ofgem-led Code consolidation workstreams, particularly in relation to legal text drafting. KE clarified that while the Workgroup could discuss Code consolidation impacts and share views, any decisions or formal development would sit with Ofgem workgroups or other established forums. The Workgroup could, however, act as a feedback mechanism, raising concerns or insights into those forums and receiving updates where appropriate.

The Workgroup also discussed the timeline and lifecycle of the Workgroup. KE noted that no formal end date had been defined, but that a key milestone would be Ofgem's expected decision on the appointment of a Code Manager in early 2027. At that stage, it may be appropriate to review the role of the Workgroup and consider transitioning responsibilities.

EA further highlighted the importance of considering how modifications at different stages of the lifecycle would be managed through the transition from current governance arrangements to the Code Manager framework. KE confirmed that this was an area of active consideration and that cross-code administrator forums were being used to explore consistency and alignment across codes.

Ellie Rogers (ER) raised concerns regarding the treatment of commercial and contractual arrangements, noting that certain discussions (e.g. PATHA, AUGE and other contractual mechanisms) are handled within specific governance forums and may involve confidential or commercially sensitive information. ER suggested that these areas should be explicitly excluded from the Workgroup's remit.

KE agreed, confirming that while the Workgroup may take a light-touch, visibility-based approach to identifying contracts requiring renewal or transition, detailed commercial discussions should remain out of scope and continue to be managed through the appropriate governance structures. KE agreed to work with ER to ensure that this distinction is clearly reflected in the ToR.

MC reiterated that the role of the Workgroup is not to intervene in existing governance arrangements, but to provide visibility, oversight and coordination, ensuring that impacts are identified and managed appropriately during the transition period.

Nicola Lond (NL) suggested that the ToR would benefit from the inclusion of a problem statement, clearly setting out the rationale for establishing the Workgroup and the key risks or challenges it is intended to address. KE agreed that this would provide useful context, noting that the Workgroup had been established in response to industry concerns regarding BAU continuity during Code Reform.

EA also suggested that resource considerations relating to Code Manager transition should be explicitly included as out of scope, to avoid overlap with other workstreams. KE acknowledged this point and confirmed that the ToR would be updated accordingly.

KE concluded by noting that the Workgroup is expected to evolve over time, with the ToR and areas of focus adapting as the Code Reform programme progresses and further clarity emerges.

Action 0301: Joint Office (JO) to update the Terms of Reference to reflect the discussion, including:

- introduction of a clear out-of-scope section (including commercial/contractual matters and Code Manager transition resourcing); and
- inclusion of a problem statement setting out the purpose of the Workgroup

2.2 Cross Code Administrators Forum Update.

KE provided an update on the Cross Code Administrators Forum, noting that meetings are held monthly across all energy codes, with Ofgem attending periodically.

KE explained that current focus areas include implementation of the Modification Prioritisation Process and consideration of recent Ofgem decisions, including the future of KCOP. The forum is being used to ensure a consistent approach across codes, recognising differences in legal frameworks and implementation timelines.

The Workgroup discussed the importance of maintaining a common standard across codes, even where approaches may differ in practice. KE confirmed that updates from the forum would be brought regularly to this Workgroup to ensure visibility.

2.3 Modification Prioritisation Process

KE presented the proposed Modification Prioritisation Process and outlined the approach previously discussed at Panel. KE explained that Ofgem is introducing a formal prioritisation framework across all energy codes, noting that while some codes already have such processes in place, this is new for both the UNC and IGT UNC. The slides can be found here: [Modification Prioritisation Presentation for Panel MAR26 \(copy\)_1.pdf](#).

KE confirmed that the framework introduces two categories of modification: Standard and High Priority, with High Priority modifications expected to follow an accelerated timeline. KE noted that, historically, prioritisation within the UNC had been managed informally through increased workgroup activity where required. However, this change introduces a formalised and consistent process aligned with Ofgem expectations. KE also confirmed that there would be no change to the existing Urgent Modification process.

KE outlined that modifications would be assessed against three key criteria: alignment with the Strategic Direction Statement (SDS), complexity, and importance. KE noted that SDS alignment reflects how closely a modification supports strategic objectives, while complexity considers factors such as resource requirements, technical difficulty and implementation effort. Importance relates to the perceived value of the modification, including its criticality and potential impact on consumers and stakeholders. KE highlighted that, although industry feedback had suggested complexity should not determine prioritisation, Ofgem had confirmed that it remains a relevant consideration.

KE explained that proposers would be required to undertake an initial assessment of their modification against these criteria. The Joint Office would then act as a “critical friend”, reviewing the proposer’s assessment and preparing a recommendation for Panel. The Panel would ultimately determine the prioritisation category through a vote. KE noted that prioritisation would not be fixed, with the ability for modifications to be reassessed either on an ad hoc basis or through a six-monthly review cycle.

KE further explained that a scoring mechanism had been developed to support consistency, with SDS alignment assessed as none, indirect or strong, and both complexity and importance assessed on a low, medium or high basis. KE emphasised that, across code administrators and in discussions with Ofgem, there is a clear expectation that High Priority modifications should be the exception rather than the norm. Initial assessments of current live modifications indicated that all would be categorised as Standard under the proposed framework.

NL queried whether guidance would be provided to ensure consistency in scoring, noting that proposers may naturally consider their modifications to be important. KE confirmed that further detail would be covered in supporting documentation.

MC sought clarification on the reference to “bi-annual” reassessment, and KE confirmed that this referred to a six-monthly review in line with Ofgem terminology.

EA suggested that it may be beneficial to develop a Frequently Asked Questions (FAQ) document to address common scenarios, including the treatment of alternative modifications, whether prioritisation could change over time, and how the process would apply across UNC and IGT UNC. KE noted that alignment across codes was a key objective and confirmed that discussions were ongoing with IGT UNC counterparts to ensure consistency, particularly in light of future Code consolidation.

Action 0302: Joint Office (JO) to consider the development of a Frequently Asked Questions (FAQ) document to support industry understanding of the Modification Prioritisation Process, including treatment of alternatives and cross-code application.

The Workgroup discussed the application of the scoring framework in practice. ER highlighted a potential example where SDS alignment may need to be reconsidered in light of “act now” requirements, noting that while this may not change the overall prioritisation outcome, it could impact scoring. KE acknowledged this and agreed that such nuances would need to be understood and applied consistently.

ER further queried how Standard modifications would be prioritised relative to one another, particularly where some score higher than others within the Standard category. KE confirmed that, at present, only High Priority modifications would be treated distinctly, with no formal sub-ranking within Standard modifications. However, KE acknowledged that this may require further consideration and refinement as the process is implemented. MC noted that an initial period of monitoring and continuous improvement would be beneficial to assess how the framework operates in practice.

Discussion also covered interaction with wider Code Reform activity. JR queried how this work aligns with Code consolidation, and KE confirmed that while Ofgem is leading consolidation workstreams, there remains scope for practical improvements (e.g. alignment of governance processes or meeting structures) to be progressed in parallel where appropriate.

Helen Cuin (HC) then presented further detail on implementation impacts. HC confirmed that the prioritisation process would apply to Authority and Self-Governance modifications only, and not to modification requests unless they progress to a formal modification. HC also outlined that a number of documents would be updated to reflect the new process, including modification reports, guidelines, Panel papers, registers, webpages and communications. HC provided examples of proposed template changes and noted that these had been published for industry review. These can be found here: [Code Reform: BAU Readiness & Integration Workgroup 25 March 2026 | Joint Office of Gas Transporters - Gas Governance](#).

HC highlighted that the Modification Guidelines document would be the most significant area of change and encouraged Members to provide detailed feedback. HC also confirmed that alternative modifications would be required to undergo their own prioritisation assessment, and that this, along with other common scenarios, could be captured within an FAQ document. NL noted that alternatives may differ in complexity and therefore should be assessed independently, which Members agreed with.

The Workgroup discussed timelines for feedback, with HC requesting comments via the Joint Office enquiries inbox. KE confirmed that feedback would be required ahead of the April Panel meeting to ensure readiness for implementation, noting that Ofgem's timeline allows for a 28-day implementation period ahead of go-live. MC confirmed that feedback should be provided by 10 April 2026, with a particular focus on the Guidelines document.

Action 0303: Industry participants to review the Modification Prioritisation documentation, with particular focus on the Guidelines document, and provide feedback to the Joint Office enquiries inbox by 10 April 2026.

KE concluded by noting that, aside from modification prioritisation, no other immediate changes are expected ahead of Code Manager implementation, although areas such as the Stakeholder Advisory Forum and best practice frameworks remain under consideration for future updates.

2.4 Live Mod

Helen Bennett (HB) presented a draft template intended to support the Workgroup's review of live modifications.

HB explained that the purpose of the template is to identify whether live modifications may impact BAU processes during the transition period, rather than to assess prioritisation. Modifications identified as having no BAU impact would be removed from the tracking log, allowing the Workgroup to focus on relevant items.

KE clarified that the Workgroup's role would be to act as a central conduit, identifying potential impacts and ensuring that issues are directed to the appropriate governance forums.

Nicola Lond (NL) supported the approach but requested an example to demonstrate how the template would be applied in practice.

Action 0304: Joint Office (JO) to populate the template with an example (e.g. Modification 0929) to illustrate its intended use.

3. Topics for discussion

MC noted that a forward plan of discussion topics would be developed to support structured Workgroup engagement. It was proposed that topics such as data digitisation would be brought to future meetings.

4. Next Steps

- The Workgroup are to provide feedback on the published documentation, particularly the Modification Prioritisation Guidelines, by 10 April 2026 to support readiness for the April Panel meeting.

5. Any Other Business

NL highlighted the importance of raising awareness of the Workgroup and its outputs across wider industry forum. It was agreed that improved visibility would be beneficial given the potential impact of Code Reform on all parties.

MC noted that key messages from this Workgroup could be shared with other committees and workgroups to ensure transparency and alignment.

Action 0305: Joint Office (JO) to introduce a standing agenda item titled ‘Key Messages’ to capture outputs from this Workgroup and facilitate their communication to relevant industry forums.

6. Diary Planning

Governance meetings are listed at: <https://www.gasgovernance.co.uk/Gov>

<https://www.gasgovernance.co.uk/codereform/bau/>

All other Joint Office events are available via: <https://www.gasgovernance.co.uk/events-calendar/month>

Time/Date	Meeting Paper Deadline	Venue	Programme
10:00 Wednesday 22 April 2026	5pm Tuesday 14 April 2026	Microsoft Teams	Standard Agenda

Governance Workgroup Actions						
Action Ref	Meeting Date	Min Ref	Action	Owner	Reporting Month	Status Update

0301	25/03/2026	2.1	<p>Terms of Reference: Joint Office (JO) to update the Terms of Reference to reflect the discussion, including:</p> <ul style="list-style-type: none"> introduction of a clear out-of-scope section (including commercial/contractual matters and Code Manager transition resourcing); and inclusion of a problem statement setting out the purpose of the Workgroup. 	JO	April 2026	Pending
0302	25/03/2026	2.3	<p>Modification Prioritisation Process: Joint Office (JO) to consider the development of a Frequently Asked Questions (FAQ) document to support industry understanding of the Modification Prioritisation Process, including treatment of alternatives and cross-code application.</p>	JO	April 2026	Pending
0303	25/03/2026	2.3	<p>Modification Prioritisation Process: Industry participants to review the Modification Prioritisation documentation, with particular focus on the Guidelines document, and provide feedback to the Joint Office enquiries inbox by 10 April 2026.</p>	The Workgroup	April 2026	Pending
0304	25/03/2026	2.4	<p>Live Mod: Joint Office (JO) to populate the template with an example (e.g. Modification 0929) to illustrate its intended use.</p>	JO	April 2026	Pending
0305	25/03/2026	5.0	<p>AOB: Joint Office (JO) to introduce a standing agenda item titled 'Key Messages' to capture outputs from this Workgroup and facilitate their communication to relevant industry forums.</p>	JO	April 2026	Pending

