










UNC Final Modification Report		At what stage is this document in the process?
<div>UNC 0864S:</div> <div>Update of UNC Code Communication Methods</div>		<div>01Modification</div> <div>02Workgroup Report</div> <div>03Draft Modification Report</div> <div>04Final Modification Report</div>
<div><b>Purpose of Modification:</b></div> <div>This Modification seeks to align obligated Code Communication methods with future communication network changes, attributable to national PSTN decommissioning, and the subsequent retirement of fax devices.</div>		
<div><b>Next Steps:</b></div> <div>Panel consideration is due on 15 August 2024.</div>		
<div><b>Impacted Parties:</b></div> <div>Low: All parties currently obligated by UNC Code Communication via facsimile</div>		
<div><b>Impacted Codes (deletion (and where appropriate, replacement) of Facsimile):</b></div> <div><ul style="list-style-type: none"><li>UNC General: Introduction, Transition Document, Modification Rules and General Terms (Part IIC, Part IIE, Section B &amp; D)</li><li>Transportation Principal Document (Sections B, J, Q, S, V &amp; X)</li><li>Offtake Arrangements Document (Sections M &amp; N)</li><li>Independent Gas Transporter Arrangements Document (Section F)</li><li>[Energy Balancing Credit Rules (Section 3)]</li></ul></div> <div><b>Impacted Codes (standardisation of Electronic Mail):</b></div> <div><ul style="list-style-type: none"><li>UNC General: Sections B &amp; D</li><li>Transportation Principal Document (Sections S &amp; V)</li></ul></div>		

Contents		 Any questions?
1	Summary	3
2	Governance	3
3	Why Change?	4
4	Code Specific Matters	5
5	Solution	6
6	Impacts & Other Considerations	7
7	Relevant Objectives	9
8	Implementation	10
9	Legal Text	11
10	Consultation	11
11	Panel Discussions	12
12	Recommendations	12
13	Appendix	12
14	Appended Representations	12
Timetable		
<b>Modification timetable:</b>		Contact:
		<b>Joint Office of Gas Transporters</b>
		 <a href="mailto:enquiries@gasgovernance.co.uk">enquiries@gasgovernance.co.uk</a>
		 0121 288 2107
		Proposer:
		<b>Gavin Williams</b>
		<b>National Gas Transmission</b>
		 <a href="mailto:gavin.williams@nationalgas.com">gavin.williams@nationalgas.com</a>
		 +44(0)7935353142
		Transporter:
		<b>National Gas</b>
		 <a href="mailto:gavin.williams@nationalgas.com">gavin.williams@nationalgas.com</a>
		 +44(0)7935353142
		Systems Provider:
		<b>Xoserve</b>
		 <a href="mailto:UKLink@xoserve.com">UKLink@xoserve.com</a>

## 1 Summary

### What

This UNC Code Modification updates prescribed UNC Code Communication methods to align with future Ofcom-led physical network changes that will be implemented nationally. This will require the deletion of the Code Communication method 'facsimile' and 'fax' within UNC documents and where appropriate, replacement with an alternative Code Communication method. Additionally, this Modification will include housekeeping to standardise the spelling of electronic mails.

### Why

Public Switched Telephone Networks (PSTN) provide residual power and data transmission capabilities for fax machine devices. In 2025, this aged infrastructure will be switched off nationally by individual telecoms companies to be replaced with an Internet Protocol (IP) digital network. This national switch-off will result in existing fax devices that are incompatible with new all-IP digital networks becoming obsolete. Consequently, UNC Parties may no longer be able to meet specific UNC obligations. The GB gas industry will need to switch to digital communication technology that is compatible with new replacement IP digital lines to ensure the continual transmission of information currently transmitted by facsimile. Failure to modify existing UNC Code Communication methods could result in non-compliance when Parties are left with no option but to physically switch to digital alternatives.

### How

To ensure compliance for all UNC parties forced to move to digital communication alternatives, it is thus necessary to implement a UNC Modification at the earliest opportunity to ensure regulatory readiness for this physical communication change. To achieve this, all identified Code Communication references to 'facsimile' and 'fax' will be deleted and where appropriate replaced with an alternative Code Communication method. This Modification proposes 'email' to be the primary replacement Code Communication method, with alternative existing UNC methods of Code Communication to be added by exception. This UNC Modification will enable the GB gas industry to physically switch to new futureproofed digital technology whilst concurrently maintaining compliance with contractual Code Communication obligations.

### Standardisation of Electronic Mail

In addition to the deletion of facsimile/fax references and replacement with alternative Code Communications where appropriate, this Modification will standardise electronic mail Code Communication references within the UNC General and TPD documents. Currently, both 'email' and 'e-mail' are used interchangeably within UNC, which may result in particular conditions being omitted from document searches. This Modification therefore proposes housekeeping to update 10 identified cases of 'e-mail' with 'email' in line with all other electronic mail references throughout UNC.

## 2 Governance

### Justification for 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.

## Requested Next Steps

This Modification should be considered a non-material change and subject to Self-Governance.

A key external driver for this Modification is the imminent decommissioning of PSTN which forces the requirement for change. It is therefore vital that the proposed timetable on page 2 is adhered to, ensuring advance preparedness to prevent undue disruption.

## Workgroup's Assessment

Workgroup participants agree that this Modification should be managed under Self-Governance procedures as it simply removes references to facsimile and fax within the UNC documents and where appropriate introduces an alternative Code communication method. It further addresses the inconsistency of spelling of electronic mails in the code. Evidence following engagement with code signatories demonstrated that facsimile (fax) is no longer widely used by organisations and as a result, the impact is anticipated to be minimal. A factor that the workgroup participants believe further supports the progression of this proposal under Self-Governance procedures.

However, there was some discussion in respect of when a communication was deemed sent via electronic means, one workgroup member identified that both the Gas Act and the Companies Act 2006 may provide precedent for such, where the sending party can show that it was properly addressed. In light of this discussion, Workgroup will encourage the Panel to consider if this proposal still meets Self-Governance criteria.

## 3 Why Change?

Agreed methods for obligated Code Communication between UNC parties are clearly outlined within UNC documents. Notwithstanding that facsimile has largely become superseded by email in line with technological advancements, its usage will likely cease in 2025. This end date first publicised in 2017, is attributable to the planned decommissioning of PSTN analogue networks on which facsimile hardware operates and the replacement with Internet Protocol (IP) digital networks. This has implications for all telecom customers who run devices including fax machines which operate on PSTN networks, as such devices will likely become obsolete.

The Government have published preparatory guidance which includes migrating to IP-supported technology in advance of the planned decommissioning. Critical National Infrastructure (CNI) ("*assets, facilities, systems, networks or processes and the essential workers that operate and facilitate them*") which is subdivided into 13 sectors including Energy, are advised to consider how they move to digital alternatives smoothly to avoid unnecessary interruption following the PSTN switch-off. Consequently, this modification updates the prescribed UNC Code Communication methods to align with this future physical communication change. This will require the deletion of 'facsimile' and 'fax' references and where appropriate the replacement with 'email' or by exception an alternative method of Code Communication.

Email has been suggested as a suitable robust alternative to facsimile because it offers an established cheap, fast, reliable, and efficient means of sending data and information which can then be saved or transposed easily. Email is not a like-for-like facsimile replacement, however, guidance on sending/receiving Notices (defined as "*any communication or other notice or communication to be given by one Party to another under the Code*") by email is detailed in **UNC General Terms, Section B, 5.2**. This section outlines the requirements of parties to provide correspondence details and defines how Notices shall be deemed to have been received.

With pending physical communication changes, it is thus prudent to implement this Code Modification at the earliest opportunity to ensure regulatory preparedness within the UNC. This will enable the GB gas industry to physically migrate to new futureproofed digital technology whilst maintaining compliance with contractual obligations and licenses. All UNC parties currently obliged to adhere to facsimile Code Communication would be impacted following the 2025 switch-off without this UNC Modification being implemented. This Code

Modification will align the GB gas industry with wider national changes resulting from the PSTN switch-off and is thus on behalf of the entire GB gas industry.

## 4 Code Specific Matters

### Linked Modifications

Modification Request 0590 is a historical Modification raised by EON and presented to the Panel on 21 July 2016) which argued facsimile was no longer a principal communication method within the GB gas industry and sought to explore alternatives along with any rationale for maintaining facsimile as a Code Communication method. This modification was withdrawn by the Proposer on 16 August 2016 after Panel voted unanimously to defer, following concerns regarding the scope of the Request and potential safety impacts owing to the (then) use of facsimile as a default communication method for network emergencies.

The landscape has since changed, and external drivers (PSTN switch-off and subsequent facsimile retirement) now force the adoption of digital solutions. For the past 5 years, Fact24 has been successfully utilised in the deployment of emergency communications to the industry during the annual Network Emergency Coordinator (NEC) Industry Exercise. Following the successful 2023 NEC Industry Exercise, the largest of its kind to date involving 400+ participants, it is understood that facsimile was not required to transmit any emergency communications. This evidence addresses earlier Panel concerns that was raised on 21 July 2016 and satisfies that the removal of facsimile will have no material impact on safety during a network emergency.

UNC Modification 0479 was raised in 2015 and introduced email into UNC alongside post and facsimile. This Modification was driven by the widespread use and efficiency of email and advocated its numerous advantages. 0479 references the positive feedback of adopting email within the energy industry provided by Ofgem in decision letters from historical UNC and Electricity Market code modifications.

Within the Retail Energy Code arena, REC 0157 has been raised to address the same problem attributable to the retirement of facsimile. REC 0157 deletes references to facsimile, however owing to email being a listed method of communication in all instances where facsimile exists, no replacement with alternative communication methods was needed. REC 0157 has been approved for implementation prior to the PSTN decommissioning deadline of December 2025.

### Reference Documents

- UNC (General, Transportation Principal Document, Offtake Arrangements Document, and Independent Gas Transporter Arrangements Document): <https://www.gasgovernance.co.uk/UNC>
- Energy Balancing Credit Rules: [EBC Rules V3.31 Approved 09.03.2023 \(002\).pdf](#) ([gasgovernance.co.uk](https://www.gasgovernance.co.uk))
- Request 0590 <https://www.gasgovernance.co.uk/0590>

### Useful Webpages

- Government guidance on the UK transition from analogue to digital landlines: <https://www.gov.uk/guidance/uk-transition-from-analogue-to-digital-landlines>
- BT guidance on PSTN and ISDN switch-off: [The PSTN and ISDN switch-off: what it means for you | BT Business](#)
- REC 0157 <https://recportal.co.uk/group/guest/-/removal-of-facsimile-as-a-method-of-code-communication>

- UNC 0479: <https://www.gasgovernance.co.uk/index.php/0479>

## 5 Solution

All references of facsimile and fax have been identified and will be deleted from UNC text, alongside additional text pertaining to the use of facsimile. Where appropriate, facsimile references will be substituted with email as the primary replacement method or by exception an alternative method of communication. A summary of the proposed solution is outlined below:

Existing UNC Text	Solution
Facsimile/fax is referenced with/without alternative listed methods of communication excluding email	Replace facsimile/fax with email, or alternative method of communication by exception
Facsimile/fax is referenced with email as an alternative listed method of communication	Delete facsimile/fax
Additional text pertaining to facsimile, such as 'facsimile number' and facsimile deemed receipt	Delete additional text

All updates to 'facsimile'/'fax' Code Communications are clearly marked in the legal text overview provided in **Appendix 1**. A summary of identified references has been provided in **Appendix 2**. Where an identified reference is within a Transitional Document and has expired, the processes and obligations will no longer be live and thus such facsimile/fax references will not need to be modified as part of this Modification. It should be noted that a Modification currently in development by NGT and DNOs seeks to remove expired Transitional Rules in their entirety, and as such it is likely any remaining Transitional Document IIC references to facsimile/fax that have expired will be later removed by that Modification.

### Alternative Solutions Considered

The following alternative solutions have been considered:

- **Continue Business as Usual**  
Not updating communication methods may result in devices becoming incompatible with new digital IP networks following the switch-off. Not updating UNC Code Communication text may result in parties being in breach of UNC obligations should alternative methods to facsimile be employed.
- **Substitute Facsimile with Alternative Primary Method to Email**  
Email is now a widely used method of communication within the GB gas industry and beyond. No alternative methods were identified by the industry during Pre-Modification industry discussions.

### Standardisation of Electronic Mail References

A 'find and replace' exercise has been undertaken to update all references of 'e-mail' as can be seen in the below table:

Existing UNC text	Updated UNC text
'E-mail'	'Email'
'Email'	-

10 references of ‘e-mail’ have been replaced with ‘email’. All updates are clearly marked in the legal text provided in **Appendix 1** and summarised in **Appendix 2**.

6 Impacts & Other Considerations

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

None.

Consumer Impacts

None. This Modification only aligns UNC Code Communication with physical communication changes associated with the retirement of fax, whilst housekeeping will simultaneously standardise electronic mail references to ‘email’. As such there are no foreseen consumer impacts.

What is the current consumer experience and 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 and cartridges respectively. The environmental benefits gained from switching to email as an approved UNC Code Communication method aligns with the UK's 2050 Net Zero ambitions.	Positive
Improved quality of service	None
Benefits for society as a whole This modification aligns the GB gas industry with changes being implemented across wider society nationally, resulting from the PSTN switch-off. This will enable sustained industry data flows that underpin the continual safe operation of the gas network, keeping homes warm and lights turned on. Additionally, environmental gains outlined above are not geographically constrained and thus benefit whole-society.	Positive

Performance Assurance Considerations

None.



## Cross-Code Impacts

Modification R0157 has been raised in respect of REC Code and has been progressed under the Self-Governance change path. Work group members recommend that implementation should be aligned where practicable and note that REC Codes Change Panel has approved for implementation in the REC's November 2025 release. It is further anticipated that a 'mirror-modification' within the IGT Code will be raised separately to support a standardised one-off Code Communication change across the whole GB gas industry network.

## EU Code Impacts

None.

## Central Systems Impacts

A Rough Order of Magnitude (ROM) has been created by Xoserve, they have identified the impacted services that they provide including User Admission, Energy Balancing Credit, Invoicing, receipt, and storage of contact information. Xoserve indicates implementation costs ranging from £150K to £230K.

Although in their original assessment, Xoserve identified multiple solution options following Workgroup discussion it was determined that only one solution was viable. (note that the ROM has been updated to reflect such)

The ROM is published here: [www.gasgovernance.co.uk/0864/](http://www.gasgovernance.co.uk/0864/)

## Initial Representations

None Received.

## Panel Questions

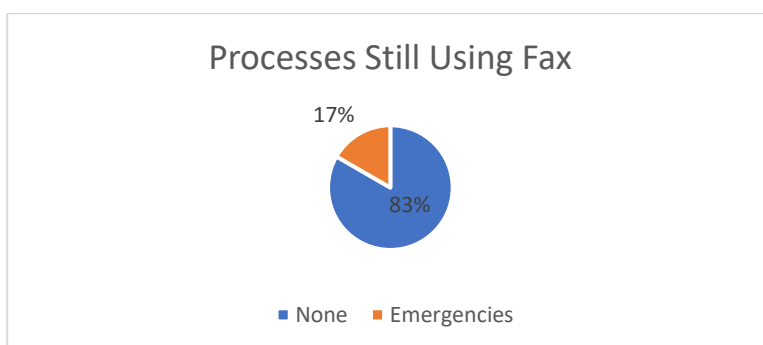
None Received.

## Workgroup Impact Assessment

The Workgroup concur with the proposer's assessment of the modification being a maintenance/housekeeping exercise and acknowledges the need to make changes as a result of the PSTN decommissioning in 2025 and ensuring a standardised description/reference to electronic mail as a Code Communication.

The Workgroup acknowledges that the proposer has consulted with industry colleagues to identify the incidence of use of fax.

The pie chart below represents the responses received from all industry parties and shows that less than 20% of parties have used fax and of those that advised that they have retained fax they have done so for Business Continuity purposes.



Workgroup acknowledges that despite further exploration no alternative methods of communication were identified in addition to those already referenced in the code.



Workgroup agree that wider impacts of the proposed change have been discussed/explored assessing similar changes raised to REC (change 0157) and acknowledges that pre-modification discussions took place in both distribution and transmission workstreams.

Workgroup acknowledges that a line-by-line assessment of all references to fax in the prevailing code has been completed and a suitable alternative considered, further workgroup agrees that appendices 1 & 2 clearly detail the changes required. During this review, a number of references were identified within transitional rules TDIIIC<sub>7</sub>; it should be noted that the proposer has not made changes to transitional rules that have clearly documented expiry dates that have passed.

Workgroup agrees that this Modification should not amend any such expired references and acknowledges it is anticipated that these will be addressed as part of a wider review of transitional arrangements within the Code.

The Workgroup recommended that implementation did not follow a phased approach however a suitable implementation period should be provided to allow impacted parties to make relevant changes to systems and operational processes.

Workgroup notes that this proposal is planned to be discussed at the 20 June Panel meeting following the request for a one-month extension.

## Reference Documents

EBC Rules: Section 2 (calculation of outstanding energy balancing indebtedness) has been identified by the Proposer.

## 7 Relevant Objectives

### Impact of the Modification on the Transporters' Relevant Objectives:

Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, 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 arrangements 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 Co-operation of Energy Regulators.	None
----------------------------------------------------------------------------------------------------------------------------------------------------------------------	------

Proposer Assessment of Relevant Objectives

Implementation of this proposed solution ahead of December 2025 would enable proactive changes to UNC and associated operational procedures to be made ahead of PSTN decommissioning. In the absence of this Modification, there is a likely risk to the efficient implementation and administration of the Code where no provisions have been made to facilitate the substitution of facsimile with alternative Code Communication methods. This Modification thus prevents such issues pertaining to Relevant Objective F and the need for a reactive Modification following facsimile retirement.

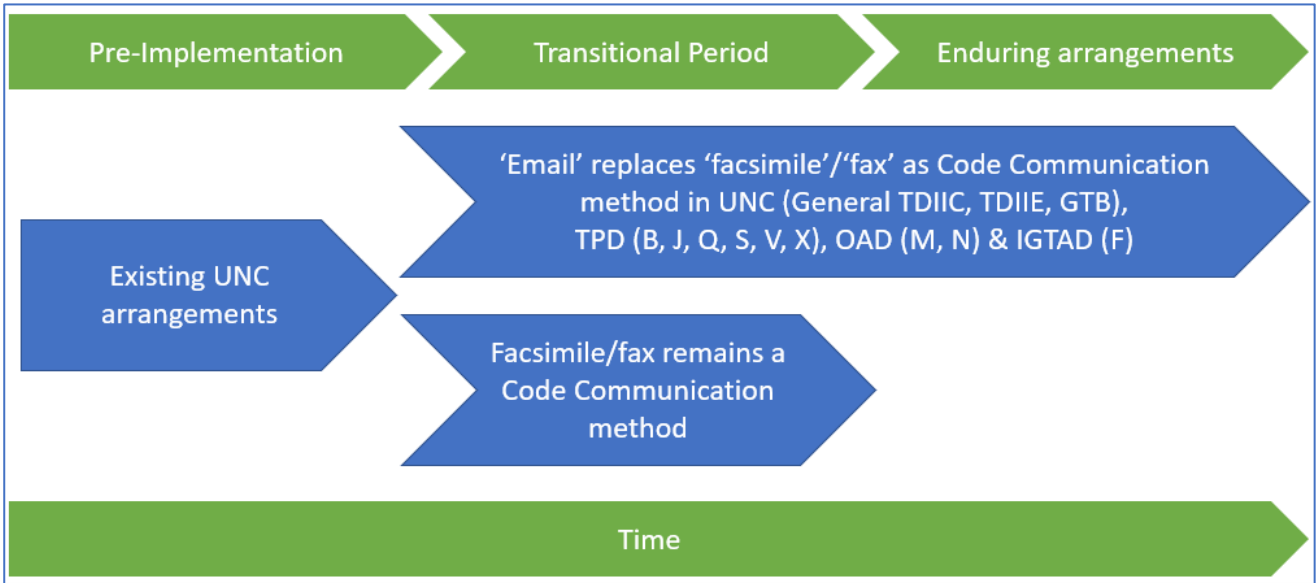
Workgroup Assessment of Relevant Objectives

The Modification furthers Relevant Objective (f), as follows.

Assessing this consequential change to the prevailing rules ahead of the enforced decommissioning of the PSTN allows parties to act proactively providing adequate time for consideration of the changes that will ensue. Removing what will become obsolete references in the code to fax and ensuring appropriate alternative means of communication have been assessed and are in place ahead of the 2025 deadline, the proactive raising of this modification also allows affected parties to ensure consequential changes to their systems / operational procedures can be assessed and implemented with minimal disruption ensuring the ongoing efficient administration of the code. Finally, the proposed alignment of all references to electronic mail removes ambiguity and facilitates improved searching capability across relevant documentation allowing for the ongoing efficient administration of Code.

8 Implementation

As Self-Governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised. Parties that require a longer lead time may submit representation which can be considered to determine a suitable implementation date. Implementation however will be no later than the PSTN decommissioning deadline of December 2025. :



## 9 Legal Text

### Text Commentary: Facsimile/Fax Replacement

The following documents have had legal text modified to reflect the Code Communication update from facsimile references, as outlined within this Proposal:

- General – 10 TDIIC (Transitional Rules)
- General – 12 TDIIE (Re-allocation of NTS Entry Capacity at Bacton ASEP)
- General – 22 GTB (Section B: General Terms)
- General – 24 GTD (Section D: CDSP and UK Link)
- TPD – 4 Section B (System Use and Capacity)
- TPD – 12 Section J (Exit Requirements)
- TPD – 18 Section Q (Emergencies)
- TPD – 20 Section S (Invoicing and Payment)
- TPD – 22 Section V (General)
- TPD – 23 Section X (Energy Balancing Credit)
- OAD – 15 Section M (Information Flows)
- OAD – 16 Section N (General)
- IGTAD – 8 Section F (General)
- (EBC Rules: Section 3 (Calculation of Outstanding Energy Balancing Indebtedness))

Owing to the scope of changes to be demonstrated within this section, the documents containing the marked legal text changes are provided separately. An overview can be seen in **Appendix 1**.

It is observed that 38 references to facsimile are within the Transition Document. Whilst some TD sections may have now expired, it nonetheless seems prudent to update these references, through implementation of this Modification, whilst this issue is explored. This will ensure the readiness of any live sections ahead of PSTN decommissioning.

### Text Commentary: Electronic Mail Reference Standardisation

The following documents have had legal text modified to reflect the Code Communication update to standardise all references to email (from e-mail), as outlined within this Proposal:

- General – 22 GTB (Section B: General Terms)
- General - 24 GTD (Section D: CDSP and UK Link)
- TPD – 20 Section S (Invoicing and Payment)
- TPD – 22 Section V (General)

### Workgroup Assessment

The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

## 10 Consultation

Representations were invited from interested parties on 21 June 2024. All representations are encompassed within the Appended Representations section, including any initial representations.

Implementation was unanimously supported in the 6 representations received.

The following table provides a high-level summary of the representations.

Representations were received from the following parties:		
Organisation	Response	Relevant Objectives
Cadent	Support	f) positive
National Gas Transmission	Support	f) positive
Northern Gas Networks	Support	f) positive
Scotland Gas Networks and Southern Gas Networks	Support	f) positive
SEFE Energy	Support	f) positive
Wales & West Utilities	Support	f) positive

Please note that late submitted representations may not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

11 Panel Discussions

12 Recommendations

13 Appendix

- Appendix 1 – Legal Text Summary
- Appendix 2 – Code Changes Locations

14 Appended Representations

- Initial Representations – None
- Representation - Cadent
- Representation - National Gas Transmission
- Representation - Northern Gas Networks
- Representation - SEFE Energy
- Representation - Scotland Gas Networks and Southern Gas Networks
- Representation - Wales & West Utilities

## UNC General Document

### Existing Code

#### UNIFORM NETWORK CODE - TRANSITION DOCUMENT

#### PART IIC – TRANSITIONAL RULES

##### 5. TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS

##### 5.6 Requirements as to Interruptible Supply Point

5.6.1 Where a User is or is to become the Registered User of one or more Interruptible Supply Points the User shall: (a) not later than the relevant date (in accordance with paragraph 5.6.4) in respect of the first Interruptible Supply Point of which it becomes Registered User, provide to the Transporter at least one telephone number and at least one facsimile number (but not more than 4 numbers in total) by means of which the Transporter may contact, 24 hours a Day, a representative of the User, and the name(s) or title(s) of not more than 3 representatives of the User who may be contacted at such numbers; (b) maintain the details provided under paragraph (a) up to date, and notify the Transporter of any change in such details before such change takes effect; and (c) secure that at all times on each Day one of such representatives is available and capable of being so contacted by telephone (with access to facsimile) or by facsimile.

5.6.2 A User shall, in relation to each Interruptible Supply Point of which it is or is to become the Registered User:

(a) not later than the relevant date (in accordance with paragraph 5.6.4), provide to the Transporter: (i) in accordance with paragraph 5.6.2(e), the names and/or job titles of representatives of the consumer ("interruption contacts") (who, for the avoidance of doubt, may be the same contacts as those referred to in TPD Section Q as "emergency contacts"), provided that the total number of interruption contacts provided for under this paragraph (and emergency contacts provided for under TPD Section Q) shall not exceed 5 in relation to any Supply Point; (ii) at least 1 (but not more than 4) telephone numbers for each interruption contact by means of which the Transporter may contact, 24 hours a day, at least one interruption contact; and (iii) one facsimile number, for the purposes of receiving communications pursuant to TPD Sections G and TPD Q, which is able to receive transmissions 24 hours a day

(b) take all reasonable steps to secure that the details provided under paragraph (a) are maintained up to date and to notify the Transporter of any change in such details before such change takes effect; (c) take all reasonable steps to secure that at all times on each Day one of such representatives is available and capable of being so contacted by telephone (with access to facsimile) and by facsimile;

5.6.7 For the purposes of paragraph 5.6.5 the User will give the relevant information to the Transporter by means of telephone or facsimile, unless it has given to the Transporter not less than one month's notice of its intention to give such information by Batch Transfer Communication, in which case such User will give information to the Transporter for the purposes of paragraph 5.6.5 only by Batch Transfer Communication, and will promptly

inform the Transporter by telephone or facsimile of the transmission of each such Batch Transfer Communication.

5.6.8 Where the Transporter notifies a User that it is unable satisfactorily to access a Batch Transfer Communication transmitted pursuant to paragraph 5.6.7, that User will promptly send to the Transporter by facsimile the information contained in that Batch Transfer Communication

#### **5.8 Notification requirements**

5.8.2 The User may request by telephone or facsimile an alteration to the Supply Points specified in the Interruption Notice; and where not less than 5 hours before the Interruption Start Time the Transporter and the User have agreed (but so that the Transporter shall not be required to agree) upon such an alteration, the Interruption Notice will be revised accordingly and resubmitted by the Transporter to the User as soon as reasonably practicable.

5.8.3 The User shall, by telephone or facsimile (or otherwise in accordance with this paragraph 5.8): (a) not later than 30 minutes after Interruption Notice was given, acknowledge receipt of that notice; (b) not later than 5 hours after Interruption Notice was given, confirm to the Transporter that Interruption (in accordance with such notice) has taken place or shall take place; (c) as soon as reasonably practicable, notify the Transporter of any facts or circumstances known to the User that might prevent Interruption from taking place or cause Interruption to take place after the Interruption Start Time; and (d) in the case of a Partner Interruptible Supply Point confirm to the Transporter, at which Partner Supply Point the Interruption has taken place or will take place.

5.8.8 Subject to paragraphs 5.8.9 and 5.8.10, where a User makes an election under paragraph 5.8.7, on expiry of the relevant period of notice Code Communications for the purposes of paragraphs 5.8.1 and 5.8.3(b) shall be given by Batch Transfer Communication, and where the User gives any Code Communication to the Transporter under this paragraph 5.8 by Batch Transfer Communication, the User must promptly inform the Transporter, by telephone or facsimile, of the transmission of such Batch Transfer Communication.

5.8.9 Where: (a) the Transporter has given to a User an Interruption Notice by Batch Transfer Communication; (b) the User is unable, in accordance with TPD Section U4.5, to access such Batch Transfer Communication; and (c) the User notifies the Transporter of such inability, by telephone or facsimile, not later than 30 minutes after the Interruption Notice was given the Transporter will give to the User Interruption Notice by facsimile, and this facsimile shall constitute an Interruption Notice for the purpose of establishing the Interruption Start Time.

5.8.10 Where any User has made an election pursuant to paragraph 5.8.7, that User may elect by notice to the Transporter: (a) to receive all Interruption Notices in respect of Supply Points in relation to which it is Registered User; and (b) to give all confirmations under

paragraph 5.8.3(b) by facsimile, provided that no election may be made under this paragraph 5.8.10 less than one month after the date of an election by that User under paragraph 5.8.7.

5.8.11 Where a User makes an election under paragraph 5.8.10, on expiry of one month from the date of the relevant notice, or from such other date as the Transporter and the User may agree, Code Communications for the purposes of paragraph 5.8.1 and 5.8.3(b) shall be given by telephone or facsimile.

#### **9 TRANSITIONAL NTS EXIT CAPACITY REGIME: GENERAL 9.1 Introduction**

9.2.12 Until the expiry of a period of 3 months from the Day on which gas was first offtaken (by any User) from the System at an NTS Supply Meter Point, the Registered User may submit, by ~~facsimile email~~ but otherwise in accordance with paragraph 9.2.2(a), an application for NTS Exit Capacity at a Firm NTS Supply Point Component which includes such Supply Meter Point by no later than 17:00 hours on the Day preceding the proposed date of registration; provided that the User may not withdraw (pursuant to paragraph 9.2.5) such an application.

#### **ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS 1 INTRODUCTION AND STRUCTURAL RULES**

##### **1.20 Reduction of Offtake at Firm Supply Points**

1.20.3 For the purposes of paragraph 1.20.1 the User will give the relevant information to the Transporter by means of telephone or ~~facsimile email~~, unless it has given to the Transporter not less than one month's notice of its intention to give such information by Batch Transfer Communication, in which case such User will give information to the Transporter for the purposes of paragraph 1.20.1 only by Batch Transfer Communication, and will promptly inform the Transporter by telephone or ~~facsimile email~~ of the transmission of each such Batch Transfer Communication.

1.20.4 Where the Transporter notifies a User that it is unable satisfactorily to access a Batch Transfer Communication transmitted pursuant to paragraph 1.20.3, that User will promptly send to the Transporter by ~~facsimile email~~ the information contained in that Batch Transfer Communication.

#### **5 DM SUPPLY POINT CAPACITY AND OFFTAKE RATE 5.1 Introduction**

5.1.12 Requests for information by the Transporter in accordance with paragraph 5.1.9 and provision of information by the Registered User in accordance with paragraph 5.1.4(e), (f) and (g) and paragraph 5.1.9(a), (b) and (c) shall be communicated by ~~facsimile or~~ email.

#### **6 INTERRUPTION**

6.6.3 Where a User is or is to become the Registered User of one or more Interruptible Supply Points the User shall:



(a) not later than the relevant date (in accordance with paragraph 6.6.6) in respect of the first Interruptible Supply Point of which it becomes Registered User, provide to the DN Operator at least one telephone number and at least one (1) ~~facsimile number~~email address (but not more than four (4) numbers/email addresses in total) by means of which the DN Operator may contact, twenty-four (24) hours a Day, a representative of the User, and the name(s) or title(s) of not more than three (3) representatives of the User who may be contacted at such numbers; (b) maintain the details provided under paragraph (a) up to date, and notify the DN Operator of any change in such details before such change takes effect; and (c) secure that at all times on each Day one of such representatives is available and capable of being so contacted by telephone ~~(with access to facsimile)~~ or by facsimileemail.

6.6.4 A User shall, in relation to each Interruptible Supply Point of which it is or is to become the Registered User: (a) not later than the relevant date (in accordance with paragraph 6.6.6), provide to the DN Operator: (i) in accordance with paragraph (e), the names and/or job titles of representatives of the consumer ("interruption contacts") (who, for the avoidance of doubt, may be the same contacts as those referred to in Section Q as "emergency contacts"), provided that the total number of interruption contacts provided for under this paragraph (and emergency contacts provided for under Section Q) shall not exceed five (5) in relation to any Supply Point; (ii) at least one (1) (but not more than four (4)) telephone numbers for each interruption contact by means of which the DN Operator may contact, twentyfour (24) hours a day, at least one interruption contact; and (iii) one (1) ~~facsimile number~~email address, for the purposes of receiving communications pursuant to Section G and Section Q, which is able to receive transmissions twenty-four (24) hours a day; (b) take all reasonable steps to secure that the details provided under paragraph (a) are maintained up to date and to notify the DN Operator of any change in such details before such change takes effect; (c) take all reasonable steps to secure that at all times on each Day one of such representatives is available and capable of being so contacted by telephone ~~(with access to facsimile)~~ and by facsimileemail;

6.6.10 For the purposes of paragraph 6.6.8 the User will give the relevant information to the DN Operator by means of telephone or facsimileemail, unless it has given to the DN Operator not less than one month's notice of its intention to give such information by Batch Transfer Communication, in which case such User will give information to the DN Operator for the purposes of paragraph 6.6.8 only by Batch Transfer Communication, and will promptly inform the DN Operator by telephone or facsimileemail of the transmission of each such Batch Transfer Communication.

6.6.11 Where the DN Operator notifies a User that it is unable satisfactorily to access a Batch Transfer Communication transmitted pursuant to paragraph 6.6.10, that User will promptly send to the DN Operator by facsimileemail the information contained in that Batch Transfer Communication.

6.8.2 The User may request by telephone or facsimileemail an alteration to the Supply Points and Interruptible Tranches specified in the Interruption Notice; and where not less than five (5) hours before the Interruption Start Time the DN Operator and the User have agreed (but

so that the DN Operator shall not be required to agree) upon such an alteration, the Interruption Notice will be revised accordingly and resubmitted by the DN Operator to the User as soon as reasonably practicable.

6.8.3 The User shall, by telephone or ~~facsimile email~~ (or otherwise in accordance with this paragraph 6.8): (a) not later than thirty (30) minutes after Interruption Notice was given, acknowledge receipt of that notice; (b) not later than five (5) hours after Interruption Notice was given, confirm to the DN Operator that Interruption (in accordance with such notice) has taken place or shall take place; and (c) as soon as reasonably practicable, notify the DN Operator of any facts or circumstances known to the User that might prevent Interruption from taking place or cause Interruption to take place after the Interruption Start Time;

#### 4. Miscellaneous

4.5 (a) Any notice to be given under this Agreement shall be in writing and shall be duly given if signed by or on behalf of a person duly authorised to do so by the person giving the notice and delivered by hand at, or by sending it by first class post or by ~~facsimile email~~ transmission to the relevant address, or ~~facsimile number email address~~ set out in Part 1 of the Schedule hereto in the case of the Shippers, and Part 2 of the Schedule hereto, in the case of the Consumer.

(b) Any Shipper and the Consumer shall be entitled to amend in any respect the particulars which relate to it and which are set out in Parts 1 and 2 of the Schedule hereto by notice to the other Shippers and the Consumer. (c) Any such notice given as aforesaid shall be deemed to have been given or received: (i) if sent by hand, at the time of delivery; (ii) if sent by ~~facsimile email, one hour after being sent in the absence of any undeliverable return receipt received by the sender during that period upon transmission acknowledged by a correct transmission slip at the end of the message~~; and (iii) if sent by post, 48 hours after posting.

#### UNIFORM NETWORK CODE - TRANSITION DOCUMENT PART IIE – RE-ALLOCATION OF NTS ENTRY CAPACITY AT BACTON ASEP 1. Introduction

1.3 A re-allocation invitation shall: (a) invite each Bacton User to propose a re-allocation of the User's Relevant Registered NTS Entry Capacity as: (i) Registered IP Capacity at the Bacton IP ASEP; or (ii) Registered NTS Entry Capacity at the Bacton UKCS ASEP; (b) specify: (i) each relevant period in respect of which the invitation applies; (ii) the date falling ten (10) Business Days after the date of the re-allocation invitation by which a Bacton User may submit a re-allocation notification; (iii) the ~~facsimile number email address~~ the Bacton User should use for the purposes of submitting a re-allocation notification;

1.4 A re-allocation notification shall specify: (a) the identity of the Bacton User; (b) for each relevant period in respect of which the User holds Relevant Registered NTS Entry Capacity the amount of that capacity which the User proposes is re-allocated as: (i) Registered IP Capacity at the Bacton IP ASEP; or (ii) Registered NTS Entry Capacity at the Bacton UKCS ASEP; (c) for each Relevant Transfer and for each relevant period comprising in the Relevant Transfer Period, the amount of the Transferred System Capacity which the User proposes be re-allocated as: (i) Registered IP Capacity at the Bacton IP ASEP; or (ii)

Registered NTS Entry Point Capacity at the Bacton UKCS ASEP; (d) the ~~facsimile number~~ email address to which National Gas Transmission should send the information referred to in paragraph 4.1.

## UNIFORM NETWORK CODE – GENERAL TERMS

### SECTION B – GENERAL

#### 5 NOTICES AND COMMUNICATIONS

5.1.6 Paragraph 5.1.5 does not apply in respect of: (a) the following Code Communications: (i) a Nomination, Interruption Notice, or notice of a System Capacity Trade, Trade Nomination or Storage Trade; (ii) a communication to be made (in accordance with TPD Section Q) during an Emergency; or (iii) any other communication to be made by UK Link Communication or by telephone or by ~~facsimile email~~ where the context requires that such communication be treated as received within the Day on which it is given;

5.2 Notices by delivery, post ~~or~~; email ~~or facsimile~~

5.2.2 Any notice shall be in writing and shall be addressed to the recipient Party at the recipient Party's address, ~~facsimile number~~ or e-mail address referred to in paragraph 5.2.3, 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~~ or e-mail address and/or marked for the attention of such other representative as the recipient Party may from time to time specify by notice given in accordance with this paragraph 5.2 to the Party giving the notice.

5.2.3 The initial address, ~~facsimile number~~, or e-mail address of a Party, and representative for whose attention notices are to be marked, shall be as specified by a User pursuant to TPD Section V2.1.2(a)(iii) or by the Transporter pursuant to TPD Section V2.2.2(a)(i) or by an Independent Gas Transporter pursuant to IGTAD Section F3.2.2(a)(iii).

5.2.5 Any notice shall be deemed to have been received: (a) in the case of delivery by hand, when delivered; or (b) in the case of first class prepaid post, on the second Day following the Day of posting (or, if sent airmail overseas or from overseas, on the fifth Day following the Day of posting); ~~or (c) in the case of facsimile, on acknowledgement by the recipient Party's facsimile receiving equipment; or (d)~~ in the case of e-mail, subject to 5.2.8, shall be deemed to have been received one hour after being sent in the absence of any undeliverable return receipt received by the sender during that period.

5.2.6 Where a notice is sent by ~~facsimile email~~: ~~(a)~~ the Party giving the notice shall (but without prejudice to paragraph 5.2.5(c)) if requested by the recipient Party, resend as soon as reasonably practicable the notice by ~~facsimile email~~; and ~~(b)~~ in the case of a Termination Notice, the Transporter will in any event, within 2 Days following the sending of such ~~facsimile email~~, send to the recipient Party a copy of the notice by first class prepaid post (airmail if overseas).

Formatted: Left

Commented [GW(G1)]: WG suggested that first class prepaid post is deleted to avoid conflict

5.2.7 A Party may specify different addresses or ~~facsimile numbers~~ email addresses and representatives pursuant to paragraph 5.2.2 for the purposes of notices of different kinds or relating to different matters.

5.2.8 If the time at which any notice or communication sent by e-mail is deemed to have been received falls after 1700 hours on a day, the notice or communication shall be deemed to have been received at the start of the next Business Day.

5.2.9 Where a notice is sent by e-mail, the Party giving the notice shall (but without prejudice to paragraph 5.2.5(d)) if requested by the recipient Party, resend as soon as reasonably practicable the notice by email.

5.3.2 Where a Party seeking to give a Communication by telephone is unable to contact a representative of the receiving Party, such Party must give the Communication by ~~facsimile~~ email and the Communication will not be deemed to have been received except in accordance with paragraph ~~5.2.5(c)~~.

Commented [GW(G2): This remains correct

## **UNIFORM NETWORK CODE – GENERAL TERMS**

### **SECTION D – CDSP AND UK LINK**

#### **5.3 Code Communications**

5.3.2 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 (subject to paragraph 5.2.4 and GT Section B5.1.2) 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.



## TPD – Section B

### Existing Code

8.6.3 Where a User is or is to become the Registered User of one or more Interruptible Supply Points the User shall:

- (a) not later than the relevant date (in accordance with paragraph 8.6.6) in respect of the first Interruptible Supply Point of which it becomes Registered User, provide to the DN Operator at least one telephone number and at least one (1) ~~facsimile number~~ email address (but not more than four (4) numbers in total) by means of which the DN Operator may contact, twenty-four (24) hours a Day, a representative of the User, and the name(s) or title(s) of not more than three (3) representatives of the User who may be contacted at such numbers;
- (b) maintain the details provided under paragraph (a) up to date, and notify the DN Operator of any change in such details before such change takes effect; and
- (c) secure that at all times on each Day one of such representatives is available and capable of being so contacted by telephone ~~(with access to facsimile)~~ or by facsimile email.

8.6.4 A User shall, in relation to each Interruptible Supply Point of which it is or is to become the Registered User:

- (a) not later than the relevant date (in accordance with paragraph 8.6.6), provide to the DN Operator:
  - (i) in accordance with paragraph (e), the names and/or job titles of representatives of the consumer ("interruption contacts") (who, for the avoidance of doubt, may be the same contacts as those referred to in Section Q as "emergency contacts"), provided that the total number of interruption contacts provided for under this paragraph (and emergency contacts provided for under Section Q) shall not exceed five (5) in relation to any Supply Point;
  - (ii) at least one (1) (but not more than four (4)) telephone numbers for each interruption contact by means of which the DN Operator may contact, twenty-four (24) hours a day, at least one interruption contact; and
  - (iii) one (1) ~~facsimile number~~ email address, for the purposes of receiving communications pursuant to Sections B8, G and Q, which is able to receive transmissions twenty-four (24) hours a day;
- (b) take all reasonable steps to secure that the details provided under paragraph (a) are maintained up to date and to notify the DN Operator of any change in such details before such change takes effect;
- (c) take all reasonable steps to secure that at all times on each Day one of such representatives is available and capable of being so contacted by telephone ~~(with access to facsimile)~~ and by facsimile email;

8.6.10 For the purposes of paragraph 8.6.8 the User will give the relevant information to the DN Operator by means of telephone or facsimile email, unless it has given to the DN Operator not less than one month's notice of its intention to give such information by Batch Transfer Communication, in which case such User will give information to the DN Operator for the purposes of paragraph 8.6.8 only by Batch Transfer Communication, and will promptly



inform the DN Operator by telephone or ~~facsimile email~~ of the transmission of each such Batch Transfer Communication.

8.6.11 Where the DN Operator notifies a User that it is unable satisfactorily to access a Batch Transfer Communication transmitted pursuant to paragraph 8.6.10, that User will promptly send to the DN Operator by ~~facsimile email~~ the information contained in that Batch Transfer Communication.

8.8.2 The User may request by telephone or ~~facsimile email~~ an alteration to the Supply Points and Interruptible Tranches specified in the Interruption Notice; and where not less than five (5) hours before the Interruption Start Time the DN Operator and the User have agreed (but so that the DN Operator shall not be required to agree) upon such an alteration, the Interruption Notice will be revised accordingly and resubmitted by the DN Operator to the User as soon as reasonably practicable

8.8.3 The User shall, by telephone or ~~facsimile email~~ (or otherwise in accordance with this paragraph 8.8): (a) not later than thirty (30) minutes after Interruption Notice was given, acknowledge receipt of that notice; (b) not later than five (5) hours after Interruption Notice was given, confirm to the DN Operator that Interruption (in accordance with such notice) has taken place or shall take place; and (c) as soon as reasonably practicable, notify the DN Operator of any facts or circumstances known to the User that might prevent Interruption from taking place or cause Interruption to take place after the Interruption Start Time;

#### ANNEX B-3 DM SUPPLY POINT CAPACITY AND OFFTAKE RATE

8.4 Requests for information by the Transporter in accordance with paragraph 8.1 and provision of information by the Registered User in accordance with paragraph 7.2(e) and 7.2(f) shall be communicated by ~~facsimile or~~ email



## TPD – Section J

Existing Code
<p>1.9.3 For the purposes of paragraph 1.9.1 the User will give the relevant information to the Transporter by means of telephone or <del>facsimile</del><u>email</u>, unless it has given to the Transporter not less than one month's notice of its intention to give such information by Batch Transfer Communication, in which case such User shall give information to the Transporter for the purposes of paragraph 1.9.1 only by Batch Transfer Communication, and will promptly inform the Transporter by telephone <del>or facsimile</del><u>email</u> of the transmission of each such Batch Transfer Communication.</p> <p>1.9.4 Where the Transporter notifies a User that it is unable satisfactorily to access a Batch Transfer Communication transmitted pursuant to paragraph 1.9.3, that User will promptly send to the Transporter by <del>facsimile</del><u>email</u> the information contained in that Batch Transfer Communication.</p>





## TPD – Section Q

Existing Code
<p>2.2.1 Each User shall provide to the Transporter: (a) a single telephone number and a single <del>facsimile number</del> email address by means of each of which the Transporter may contact, 24 hours a Day, a representative of the User in a Gas Supply Emergency for any purpose pursuant to this Section Q</p> <p>2.3.1 A User shall in respect of each Large Firm Supply Point of which it is the Registered User provide to the Transporter:</p> <p>(a) in accordance with paragraph 2.3.2, the names and/or job titles of representatives of the consumer ("emergency contacts") each of which has the power and authority to comply with any direction given pursuant to Regulation 6(4);</p> <p>(b) at least one (but not more than four) telephone numbers for each emergency contact by means of which the Transporter may contact, 24 hours a day, at least one emergency contact; and</p> <p>(c) 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 <del>facsimile number</del> telephone number and one email address, for the purposes of receiving communications pursuant to this Section Q, which is able to receive transmissions 24 hours a day</p> <p>2.4.1 A User shall in respect of each Interruptible Supply Point of which it is the Registered User provide to the Transporter:</p> <p>(a) the name and (in the case of a corporation) registered office of the consumer;</p> <p>(b) in accordance with paragraph 2.4.2, the names and/or job titles of representatives of the consumer ("emergency contacts") each of which has the power and authority to comply with any direction given pursuant to Regulation 6(4);</p> <p>(c) at least one (but not more than four (4)) telephone numbers for each emergency contact by means of which the Transporter may contact, 24 hours a day, at least one (1) emergency contact; and</p> <p>(d) one <del>facsimile number</del> email address, for the purposes of receiving communications pursuant to Sections B8, G and Q, which is able to receive transmissions 24 hours a day</p>

## TPD – Section S

Existing Code
<p>3.4 Remittance advice</p> <p>3.4.5 Where the Invoice Document number is not quoted (in accordance with paragraph 3.4.4) with any remittance made by or on behalf of a User, and no Invoice Remittance Advice corresponding to the remittance is submitted, the Transporter will endeavour to obtain the User's instructions (by telephone, <del>facsimile</del>, or <del>e-mail</del>) as to the application thereof; but if it has not (by the Business Day following the Day of the remittance) obtained such instructions, the Transporter will apply the amount remitted to or towards Invoice Amount(s) in order of Invoice Due Date (the earliest first) and proportionately as between Invoice Amounts with the same Invoice Due Date, but applying such amount last to any Invoice Amounts which are subject to an Invoice Query.</p>



## TPD – Section V

Existing Code
<p>2.1 Admission requirements</p> <p>2.1.1 In order to become a Shipper User in relation to a System or a Trader User in relation to the NTS a person (the "Applicant User") must:</p> <p>(a) satisfy or secure satisfaction of the relevant requirements in paragraph 2.1.2; and</p> <p>(b) accede to the relevant Shipper Framework Agreement and thereby agree to be bound by the Code.</p> <p>2.1.2 The requirements referred to in paragraph 2.1.1(a) are as follows:</p> <p>(a) the Applicant User shall have applied to the Transporter, in such form as the Transporters may from time to time prescribe, giving the following details:</p> <p>(i) the name of the Applicant User;</p> <p>(ii) the legal nature of the Applicant User, and where the Applicant User is not a company incorporated under the Companies Act 1985 (as amended), such further information concerning the constitution of the Applicant User as the Transporter may reasonably require;</p> <p>(iii) the postal and e-mail address and telephone <del>and facsimile</del> numbers of the Applicant User, and the individual for whose attention notice is to be marked, for the purposes of notice under GT Section B5.2.3 and B5.3.1</p> <p>3.4.7 Each User shall provide to the Transporter:</p> <p>(a) a single telephone number, a single address, <del>and</del> a single e-mail address <del>and a single facsimile number</del> by means of which the Transporter may contact a representative of the User for any purpose pursuant to Transportation Charges in connection with Section V3 and/or V4; and</p> <p>(b) the name(s) or title(s) of the User's representatives who may be contacted at such numbers and address; and</p> <p>(c) such User shall inform the Transporter where there are any amendments to the details provided pursuant to this section V3.4.7.</p>

## TPD – Section X

Existing Code
<p>2.7 Cash Call Appeals</p> <p>2.7.1 Where:</p> <p>(a) a Cash Call (the "relevant" Cash Call) has been submitted to a User;</p> <p>(b) the amount of the relevant Cash Call, alone or in aggregate with any other Cash Calls made to the User in the same calendar month, exceeds whichever is the lesser of £1,000,000 and 20% of the User's Cash Call Limit; and</p> <p>(c) the User considers that the amount of the relevant Cash Call has been calculated erroneously,</p> <p>the User may, not later than 12:00 hours on the Business Day on which the relevant Cash Call is (in accordance with paragraph 2.8.1, disregarding paragraph 2.7.8(a)) due for payment, so notify National Gas Transmission, specifying in as much detail as is possible the User's reasons for so considering.</p> <p>2.7.2 Where a User gives a notification under paragraph 2.7.1:</p> <p>(a) the relevant Cash Call (and the obligation of the User to make payment thereof) will be suspended, subject to paragraph 2.7.3;</p> <p>(b) National Gas Transmission will review the details provided by the User and will review the calculations made of the User's Outstanding Relevant Balancing Indebtedness;</p> <p>(c) if requested by National Gas Transmission the User shall provide by telephone or <del>facsimile email</del> any further details or explanation of its view</p> <p>2.7.9 A notification under paragraph 2.7.1 or notice under 2.7.5 shall be given:</p> <p>(a) by <del>facsimile email</del>; or</p> <p>(b) by telephone confirmed by <del>facsimile email</del> given not later than 17:00 hours on the same Day</p> <p>2.10 Further Security Request</p> <p>2.10.4 Where a User gives a notification under paragraph 2.10.3:</p> <p>(a) the relevant Further Security Request (and the obligation to provide further, additional or revised Security) will be suspended, subject to paragraph 2.10.5</p> <p>(b) National Gas Transmission will review the details provided by the User and will review the calculations made of the User's Outstanding Relevant Code Indebtedness;</p> <p>(c) if requested by National Gas Transmission the User shall provide by telephone or <del>facsimile email</del> any further details or explanation of its view.</p>



OAD – Section M

Existing Code
2.2 Means of providing information 2.2.1 (Unless otherwise provided elsewhere in the Transportation Principal Document or this Document) the means by which information may be provided by a Party are as follows: (a) by telemetry as provided in Section E; (b) by or through the CDSP, or by means of systems provided by the CDSP, pursuant to the DSC; <del>(c) by fax in accordance with GT Section B5.2;</del> (d) <del>by telephone in accordance with GT Section B5.3</del> (e) by any other specific medium and/or communications system described in the Offtake Communications Document; and/or (f) any combination of the above

Commented [GW(G3)]: Remains correct

Commented [GW(G4)]: Suggested specific listed methods of communication removed to aid futureproofing of code

## OAD – Section N

Existing Code
<p>4.2 Requirements for admission</p> <p>4.2.1 In order to become a Party, the New DNO shall:</p> <p>(a) satisfy or secure the satisfaction of the requirements in paragraph 4.2.2; and</p> <p>(b) accede to the Transporters Framework Agreement by executing and delivering to National Gas Transmission an Accession Agreement and thereby agree to be bound by this Document.</p> <p>4.2.2 The requirements referred to in paragraph 4.2.1(a) are as follows:</p> <p>(a) the New DNO shall have applied to National Gas Transmission, in such form as the Offtake Committee may from time to time prescribe, giving the following details:</p> <p>(i) the name of the New DNO;</p> <p>(ii) the legal nature of the New DNO and, where the New DNO is not a company incorporated under the Companies Act 1985 (as amended), such further information concerning the constitution of the New DNO as National Gas Transmission may reasonably require;</p> <p>(iii) the address, telephone and <del>facsimile number</del> <u>email addresses</u> of the New DNO, and the individual for whose attention notice is to be marked, for the purposes of notice under GT Section B5.2.3; and</p>



## Independent Gas Transporter Arrangements Document – Section F

Existing Code
<p>3.2 Requirements for admission 3.2.1 In order to become a Party, the New IGT shall: (a) satisfy or secure the satisfaction of the requirements in paragraph 3.2.2; and (b) accede to the Transporters Framework Agreement by executing and delivering to National Gas Transmission an Accession Agreement and thereby agree to be bound by this Document.</p> <p>3.2.2 The requirements referred to in paragraph 3.2.1(a) are as follows: (a) the New IGT shall have applied to National Gas Transmission, in such form as the IGTAD Committee may from time to time prescribe, giving the following details: (i) the name of the New IGT; (ii) the legal nature of the New IGT and, where the New IGT is not a company incorporated under the Companies Act 2006 (as amended), such further information concerning the constitution of the New IGT as National Gas Transmission may reasonably require; (iii) the address, telephone and <del>facsimile number</del> email addresses of the New IGT, and the individual for whose attention notice is to be marked, for the purposes of notice under GT Section B5.2.3; and (iv) where the New IGT is not a company incorporated under the Companies Act 2006 (as amended), an address for service in accordance with GT Section B6.7.3;</p>



Document	Section	Subsection	Reference	Facsimile	Fax	Count
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.6 Requirements as to Interruptible Supply Points	5.6.1	3	0	3
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.6 Requirements as to Interruptible Supply Points	5.6.2	3	0	3
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.6 Requirements as to Interruptible Supply Points	5.6.7	2	0	2
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.6 Requirements as to Interruptible Supply Points	5.6.8	1	0	1
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.8 Notification requirements	5.8.2	1	0	1
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.8 Notification requirements	5.8.3	1	0	1
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.8 Notification requirements	5.8.8	1	0	1
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.8 Notification requirements	5.8.9	3	0	3
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.8 Notification requirements	5.8.10	1	0	1
General	TRANSITIONAL INTERRUPTION REGIME: INTERRUPTIBLE SUPPLY POINTS	5.8 Notification requirements	5.8.11	1	0	1
General	TRANSITIONAL NTS EXIT CAPACITY REGIME: GENERAL	9.2 Registration: NTS CSEPS	9.2.12	1	0	1
General	ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS	1.20 Reduction of Offtake at Firm Supply Points	1.20.3	2	0	2
General	ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS	1.20 Reduction of Offtake at Firm Supply Points	1.20.4	1	0	1
General	ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS	5.1 Introduction	5.1.12	1	0	1
General	ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS	6.6 Requirements as to Interruptible Supply Points	6.6.3	3	0	3
General	ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS	6.6 Requirements as to Interruptible Supply Points	6.6.4	3	0	3
General	ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS	6.6 Requirements as to Interruptible Supply Points	6.6.10	2	0	2

Document	Facsimile'/'Fax' Total Count
General	51
Offtake Arrangements Document	2
Transportation Principal Document	25
EUROPEAN INTERCONNECTION DOCUMENT	0
INDEPENDENT GAS TRANSPORTER ARRANGEMENTS DOCUMENT	1
Energy Balancing Credit Rules	1
Total	80

General	ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS	6.6 Requirements as to Interruptible Supply Points	6.6.11	1	0	1
General	ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS	6.8 Interruption Notification Requirements	6.8.2	1	0	1
General	ANNEX 1 UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION G – SUPPLY POINTS	6.8 Interruption Notification Requirements	6.8.3	1	0	1
General	ANNEX G-2 MANDATORY ALLOCATION AGENCY TERMS	4 Miscellaneous	4.5	3	0	3
General	UNIFORM NETWORK CODE - TRANSITION DOCUMENT PART IIE – RE-ALLOCATION OF NTS ENTRY CAPACITY AT BACTON ASEP	1 Introduction	1.3	1	0	1
General	UNIFORM NETWORK CODE - TRANSITION DOCUMENT PART IIE – RE-ALLOCATION OF NTS ENTRY CAPACITY AT BACTON ASEP	1 Introduction	1.4	1	0	1
General	UNIFORM NETWORK CODE – GENERAL TERMS SECTION B – GENERAL	5.1 General	5.16	1	0	1
General	UNIFORM NETWORK CODE – GENERAL TERMS SECTION B – GENERAL	5.2 Notices by delivery, post, email or facsimile	5.2	1	0	1
General	UNIFORM NETWORK CODE – GENERAL TERMS SECTION B – GENERAL	5.2 Notices by delivery, post, email or facsimile	5.2.2	2	0	2
General	UNIFORM NETWORK CODE – GENERAL TERMS SECTION B – GENERAL	5.2 Notices by delivery, post, email or facsimile	5.2.3	1	0	1
General	UNIFORM NETWORK CODE – GENERAL TERMS SECTION B – GENERAL	5.2 Notices by delivery, post, email or facsimile	5.2.5	2	0	2
General	UNIFORM NETWORK CODE – GENERAL TERMS SECTION B – GENERAL	5.2 Notices by delivery, post, email or facsimile	5.2.6	3	0	3
General	UNIFORM NETWORK CODE – GENERAL TERMS SECTION B – GENERAL	5.2 Notices by delivery, post, email or facsimile	5.2.7	1	0	1
General	UNIFORM NETWORK CODE – GENERAL TERMS SECTION B – GENERAL	5.3 Communication by telephone	5.3.2	1	0	1
General	UNIFORM NETWORK CODE – GENERAL TERMS SECTION D – CDSP AND UK LINK	5.3 Code Communications	5.3.2	1	0	1
Offtake Arrangements Document	UNIFORM NETWORK CODE – OFFTAKE ARRANGEMENTS DOCUMENT SECTION N GENERAL	4.2 Requirements for admission	4.2.2	1	0	1
Offtake Arrangements Document	UNIFORM NETWORK CODE – OFFTAKE ARRANGEMENTS DOCUMENT SECTION M INFORMATION FLOWS	2.2 Means of providing information	2.21	0	1	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION B – SYSTEM USE AND CAPACITY	8.6 Requirements as to Interruptible Supply Points	8.6.3	3	0	3

Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION B – SYSTEM USE AND CAPACITY	8.6 Requirements as to Interruptible Supply Points	8.6.4	3	0	3
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION B – SYSTEM USE AND CAPACITY	8.6 Requirements as to Interruptible Supply Points	8.6.10	2	0	2
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION B – SYSTEM USE AND CAPACITY	8.6 Requirements as to Interruptible Supply Points	8.6.11	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION B – SYSTEM USE AND CAPACITY	8.8 Interruption Notification Requirements	8.8.2	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION B – SYSTEM USE AND CAPACITY	8.8 Interruption Notification Requirements	8.8.3	1	0	1
Transportation Principal Document	ANNEX B-3 DM SUPPLY POINT CAPACITY AND OFFTAKE RATE	8 Feasibility Assessment	8.4	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION J – EXIT REQUIREMENTS	1.9 Reduction of Offtake at Firm Supply Points	1.9.3	2	0	2
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION J – EXIT REQUIREMENTS	1.9 Reduction of Offtake at Firm Supply Points	1.9.4	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION Q – EMERGENCIES	2.2 User emergency contacts	2.2.1	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION Q – EMERGENCIES	2.3 Large Firm Supply Points	2.3.1	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION Q – EMERGENCIES	2.4 Interruptible Supply Points	2.4.1	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION S – INVOICING AND PAYMENT	3.4 Remittance advice	3.4.5	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION V – GENERAL	2.1 Admission requirements	2.1.2	1	0	1

Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION V – GENERAL	3.4 Surety or Security under Code	3.4.7	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION X – ENERGY BALANCING CREDIT MANAGEMENT	2.7 Cash Call Appeals	2.7.2	1	0	1
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION X – ENERGY BALANCING CREDIT MANAGEMENT	2.7 Cash Call Appeals	2.7.9	2	0	2
Transportation Principal Document	UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION X – ENERGY BALANCING CREDIT MANAGEMENT	2.10 Further Security Request	2.10.4	1	0	1
EUROPEAN INTERCONNECTION DOCUMENT	UNIFORM NETWORK CODE – EUROPEAN INTERCONNECTION DOCUMENT	NA	NA	0	0	0
INDEPENDENT GAS TRANSPORTER ARRANGEMENTS	UNIFORM NETWORK CODE – INDEPENDENT GAS TRANSPORTER ARRANGEMENTS DOCUMENT SECTION F – GENERAL	3.2 Requirements for admission	3.2.2	1	0	1
Energy Balancing Credit Rules	The Energy Balancing Credit Rules	3.3 Appeals	3.3b Valid Appeal Process	1	0	1

Document	Section	Subsection	Reference	Email	E-mail	Count
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	Transition Document Part IIC	5 DM SUPPLY POINT CAPACITY AND OFFTAKE RATE	5.1.4	1	0	0
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	Transition Document Part IIC	5 DM SUPPLY POINT CAPACITY AND OFFTAKE RATE	5.1.12	1	0	0
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	Transition Document Part VI	8. Eligible User	8.2	1	0	0
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	Modification Rules	2.4 Electronic Publication	2.4(b)	1	0	0
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	General Terms Section B	5.2 Notices by delivery, post, email or facsimile	5.2	1	0	0
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	General Terms Section B	5.2 Notices by delivery, post, email or facsimile	5.2.2	0	2	2
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	General Terms Section B	5.2 Notices by delivery, post, email or facsimile	5.2.3	0	1	1

Document	E-mail' Total Count
General	7
Transportation Principal Document	3
Total	10

Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	General Terms Section B	5.2 Notices by delivery, post, email or facsimile	5.2.5	0	1	1
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	General Terms Section B	5.2 Notices by delivery, post, email or facsimile	5.28	0	1	1
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	General Terms Section B	5 NOTICES AND COMMUNICATIONS	5.29	1	1	1
Uniform Network Code - INTRODUCTION, TRANSITION DOCUMENT, MODIFICATION RULES AND GENERAL TERMS	General Terms Section D	5.3 Code Communications	5.3.2	0	1	1
Uniform Network Code - TRANSPORTATION PRINCIPAL DOCUMENT	Section B	8 Feasibility Assessment	8.4	1	0	0
Uniform Network Code -TRANSPORTATION PRINCIPAL DOCUMENT	Section G	8.7 Supply Point Deregistration and subsequent User Activity	8.7.1(b)	1	0	0
Uniform Network Code - TRANSPORTATION PRINCIPAL DOCUMENT	Section S	3.4 Remittance advice	3.4.5	0	1	1
Uniform Network Code - TRANSPORTATION PRINCIPAL DOCUMENT	Section V	2.1 Admission requirements	2.1.2(a)(iii)	0	1	1
Uniform Network Code - TRANSPORTATION PRINCIPAL DOCUMENT	Section V	3.4 Surety or Security under Code	3.4.7(a)	0	1	1

Representation – Draft Modification Report

UNC 0864S Update of UNC Code Communication Methods

Responses invited by: 5pm on 19 July 2024

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Andy Clasper
Organisation:	Cadent
Date of Representation:	17 July 2024
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition: Please summarise the key reason(s) for your support or opposition.

The modification, if implemented, will align UNC Code Communication methods with the future network changes once PSTN has been switched off. For the majority of parties this also aligns with current practice as the use of ‘fax’ appears to now be very limited.

Governance Statement: Please provide your views on the self-governance statement or reasons why Authority Direction should apply.

We agree with the proposer that due to lack of material impacts, Self-Governance should apply.

Impacts and Costs: Please provide a view on the impacts and costs you would face.

None identified

Implementation: What lead-time do you wish to see prior to implementation and why?

Legal Text: Are you satisfied that the legal text will deliver the intent of the Solution?

We are satisfied the legal text meets the intent of the solution.

Panel Questions: Panel Members have requested that the following questions are addressed.

**Q1:** *Do you have any views on the proposal for deemed receipt of an email (as defined by legislation - Companies Act 2006 Section 1147 [Companies Act 2006 \(legislation.gov.uk\)](https://legislation.gov.uk)).*

**Q2:** *Do you have any views on timescales for implementation across the gas and power industry?*

**Q3:** *Will the requirement to change from Fax to email, including updating information currently held in central systems, cause parties any concerns?*

No concerns identified

**Error or Omissions:** *Are there any errors or omissions in this Modification Report that you think should be taken into account? Please include details of any impacts/costs to your organisation that are directly related to this.*

None identified

**Additional analysis:** *Please provide below any analysis or information to support your representation.*

Nothing further to add



Representation – Draft Modification Report

UNC 0864S Update of UNC Code Communication Methods

Responses invited by: 5pm on 19 July 2024

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Malcolm Montgomery
Organisation:	National Gas
Date of Representation:	19/07/24
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	Not Applicable

**Reason for support/opposition:** Please summarise the key reason(s) for your support or opposition.

As proposer we support this Modification Proposal. The driver for fax removal sits outside of the gas industry, but the gas industry must operate within the confines of the wider environment. It is therefore a sensible and practical matter to prepare the UNC ahead of the fax communication method being terminated.

**Governance Statement:** Please provide your views on the self-governance statement or reasons why Authority Direction should apply.

Self-governance is appropriate.

**Impacts and Costs:** Please provide a view on the impacts and costs you would face.

A ROM has been provided. No material additional costs have been identified for NG.

**Implementation:** What lead-time do you wish to see prior to implementation and why?

There is no immediate urgency around implementation as the PSTN decommissioning deadline is not until Dec 2025. A steer can be taken from the CDSP on a suitable date taking into account other priorities and scheduling.

**Legal Text:** Are you satisfied that the legal text will deliver the intent of the Solution?

Yes.

**Panel Questions:** *Panel Members have requested that the following questions are addressed.*

**Q1:** *Do you have any views on the proposal for deemed receipt of an email (as defined by legislation - Companies Act 2006 Section 1147 [Companies Act 2006 \(legislation.gov.uk\)](https://legislation.gov.uk)).*

**Q2:** *Do you have any views on timescales for implementation across the gas and power industry?*

**Q3:** *Will the requirement to change from Fax to email, including updating information currently held in central systems, cause parties any concerns?*

No particular concerns identified.

**Error or Omissions:** *Are there any errors or omissions in this Modification Report that you think should be taken into account? Please include details of any impacts/costs to your organisation that are directly related to this.*

None identified.

**Additional analysis:** *Please provide below any analysis or information to support your representation.*

n/a

Joint Office

[enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

26<sup>th</sup> June 2024

Dear Joint Office,

**Re: 0864S: Update of UNC Code Communication Methods**

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

**NGN supports this Modification Proposal.**

**Relevant Objective:**

**f) Promotion of efficiency in the implementation and administration of the Code - Positive**

**Reason for support:**

This modification seeks to align obligated Code Communication methods with future communication network changes. NGN supports the implementation of this modification as it is expected that the Public Switched Telephone Networks (PSTN) are to be decommissioned and switched off in the near future and should be replaced with an Internet Protocol digital network. The switch off will result in existing fax devices becoming obsolete and this modification should allow Code Parties to remain compliant to the Code Communication obligations within the UNC. This supports relevant objective: *f) Promotion of efficiency in the implementation and administration of the Code.*

**Implementation:**

We agree that this modification should be self-governance and that implementation should as soon as practicable, however implementation is required by no later than the PSTN decommissioning deadline.

**Impacts and Costs:**

None identified.

**Legal Text:**

We believe that the legal text provided should deliver the Solution set out in the proposal.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?**

None identified.

**Please provide below any additional analysis or information to support your representation.**

None.

**Smell gas?**

Call the National Gas Emergency  
Service on 0800 111 999



1100 Century Way  
Thorpe Park Business Park  
Colton, Leeds LS15 8TU



0113 397 5300



[northerngasnetworks.co.uk](http://northerngasnetworks.co.uk)

**we are  
the network**

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)  
Markets Regulation Manager  
Mobile: 07580 215743

**Smell gas?**

Call the National Gas Emergency  
Service on 0800 111 999

**a** 1100 Century Way  
Thorpe Park Business Park  
Colton, Leeds LS15 8TU

**t** 0113 397 5300  
**w** [northerngasnetworks.co.uk](http://northerngasnetworks.co.uk)

**we are  
the network**

Northern Gas Networks Limited is registered in England and Wales, no. 5167070. Registered office: 1100 Century Way, Colton, Leeds LS15 8TU

Representation – Draft Modification Report

UNC 0864S Update of UNC Code Communication Methods

Responses invited by: 5pm on 19 July 2024

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	David Mitchell
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	18 <sup>th</sup> July 2024
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	Not Applicable

**Reason for support/opposition:** Please summarise the key reason(s) for your support or opposition.

SGN supports the implementation of this modification proposal as it seeks to amend the UNC communication methods in advance of the Public Switched Telephone Networks (PSTN) being decommissioned and replaced by an Internet Protocol digital network. The decommissioning of the existing PTSN will mean that communications via fax will no longer be possible therefore this modification is essential as it will remove all references to facsimile and fax from the UNC and will replace them with email or an alternative method of communication as necessary. This modification should allow UNC parties to remain compliant with the code communication obligations as set out in the UNC.

**Governance Statement:** Please provide your views on the self-governance statement or reasons why Authority Direction should apply.

We agree that this modification should be self-governance.

**Impacts and Costs:** Please provide a view on the impacts and costs you would face.

None identified.

**Implementation:** What lead-time do you wish to see prior to implementation and why?

This modification should be implemented as soon as practicable in advance of the PTSN decommissioning deadline.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

We are satisfied that the legal text will deliver the solution as set out in the modification proposal.

**Panel Questions:** *Panel Members have requested that the following questions are addressed.*

**Q1:** *Do you have any views on the proposal for deemed receipt of an email (as defined by legislation - Companies Act 2006 Section 1147 [Companies Act 2006 \(legislation.gov.uk\)](https://legislation.gov.uk)).*

We agree with the legislation in the companies act 2006 that information sent electronically that is properly addressed is deemed to have been received by the intended recipient 48hrs after it was sent.

**Q2:** *Do you have any views on timescales for implementation across the gas and power industry?*

This modification should be implemented as soon as practicable in advance of the PTSN decommissioning deadline

**Q3:** *Will the requirement to change from Fax to email, including updating information currently held in central systems, cause parties any concerns?*

SGN does not have any concern regarding the switch from Fax to email as a code communication method.

**Error or Omissions:** *Are there any errors or omissions in this Modification Report that you think should be taken into account? Please include details of any impacts/costs to your organisation that are directly related to this.*

None identified.

**Additional analysis:** *Please provide below any analysis or information to support your representation.*

None identified.

## SEFE Energy Representation Draft Modification Report

### Modification 00864S Update of UNC Code Communication Methods

1. **Consultation close out date:** 19<sup>th</sup> July 2024
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:**  
SEFE Energy  
5<sup>th</sup> Floor  
8 First Street  
Manchester  
M15 4RP
4. **Representative:**  
Steve Mulinganie  
SEFE Energy  
Senior Regulatory Manager  
[stevemulinganie@sefe-energy.com](mailto:stevemulinganie@sefe-energy.com)  
0799 097 2568
5. **Date of Representation:** 19<sup>th</sup> July 2024
6. **Do you support or oppose Implementation:**  
We **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
The PSTN decommissioning and the subsequent retirement of fax devices necessitates a change.
8. **Are there any new or additional Issues for the Modification Report:**  
**Yes**  
  
Can we confirm that the date in the draft Modification Report of December 2025 is still correct for PSTN decommissioning
9. **Self-Governance Statement Do you agree with the status?**  
**Yes**

**10. Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

We **agree** with the proposer that this modification is **positive in respect of Relevant Objective F**

**11. Impacts & Costs:**

*What analysis, development and on-going costs would you face if this modification was implemented?*

We **have not** identified any significant costs associated with the implementation of this modification

**12. Implementation:**

*What lead times would you wish to see prior to this modification being implemented, and why?*

Whilst we note the modification to be Self Governance, **we would prefer implementation** to align with the removal of the PSTN decommissioning (currently **December 2025** in draft modification report) and the subsequent retirement of fax devices. This would help by minimising noncritical changes during the Market Wide Half Hourly implementation.

**13. Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

We have not reviewed the Legal Text provided.

**14. Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.*

**No**

**Modification Panel Members have requested that the following questions are addressed:**

**Q1: Do you have any views on the proposal for deemed receipt of an email (as defined by legislation - Companies Act 2006 Section 1147 Companies Act 2006 ([legislation.gov.uk](http://legislation.gov.uk))).**

We note the comments made in relation to this matter during the Work Group meetings

**Q2: Do you have any views on timescales for implementation across the gas and power industry?**

Whilst we note the modification to be Self Governance, **we would prefer implementation** to align with the removal of the PSTN decommissioning (currently **December 2025** in draft modification report) and the subsequent retirement of fax devices. This would help by minimising noncritical changes during the Market Wide Half Hourly implementation.



**Q3: Will the requirement to change from Fax to email, including updating information currently held in central systems, cause parties any concerns?**

Whilst we note the modification to be Self Governance, **we would prefer implementation** to align with the removal of the PSTN decommissioning (currently **December 2025** in draft modification report) and the subsequent retirement of fax devices. This would help by minimising noncritical changes during the Market Wide Half Hourly implementation.

## Representation – Draft Modification Report

### UNC 0864S Update of UNC Code Communication Methods

Responses invited by: **5pm on 19 July 2024**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Marina Papathoma
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	18/07/2024
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>f)</b> Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

**Reason for support/opposition:** *Please summarise the key reason(s) for your support or opposition.*

This Modification seeks to align obligated Code Communication methods with future communication network changes. This will require the deletion of the Code Communication method 'facsimile' and 'fax' within UNC documents and where appropriate, replacement with an alternative Code Communication method. This modification proposes 'email' to be the primary replacement Code Communication method, with alternative existing UNC methods of Code Communication to be added by exception. It further addresses the inconsistency of spelling of electronic mails in the code.

WWU supports the implementation of this modification as it will allow Code Parties to remain compliant with the Code Communication obligations within the UNC upon the decommission of Public Switched Telephone Networks (PSTN) and moving to digital communication alternatives.

We agree with the proposers assessment that the modification furthers relevant objective f) Promotion of efficiency in the implementation and administration of the Code.

**Governance Statement:** *Please provide your views on the self-governance statement or reasons why Authority Direction should apply.*

We believe this modification meets the criteria for self-governance.

**Impacts and Costs:** *Please provide a view on the impacts and costs you would face.*

We do not anticipate any cost impacts.

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

This modification should be implemented by no later than the PSTN decommissioning deadline.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

**Panel Questions:** *Panel Members have requested that the following questions are addressed.*

**Q1:** *Do you have any views on the proposal for deemed receipt of an email (as defined by legislation - Companies Act 2006 Section 1147 [Companies Act 2006 \(legislation.gov.uk\)](https://legislation.gov.uk)).*

The discussion in respect of when a communication is deemed sent via electronic means raised some concern. For this reason, we support the proposal for deemed receipt of an email as defined by the Companies Act 2006.

**Q2:** *Do you have any views on timescales for implementation across the gas and power industry?*

It is prudent to implement this Code Modification at the earliest opportunity to ensure regulatory preparedness within the UNC. This will enable Code Parties to migrate to new digital technology whilst maintaining compliance with contractual obligations and licenses.

**Q3:** *Will the requirement to change from Fax to email, including updating information currently held in central systems, cause parties any concerns?*

No concerns.

**Error or Omissions:** *Are there any errors or omissions in this Modification Report that you think should be taken into account? Please include details of any impacts/costs to your organisation that are directly related to this.*

None.

**Additional analysis:** *Please provide below any analysis or information to support your representation.*

None.