









UNC Final Modification Report	At what stage is this document in the process?
<h1 data-bbox="132 320 730 414">UNC 0776S:</h1> <h2 data-bbox="132 448 1098 656">Revision of the Modification Panel Meeting Location Requirement in the Modification Rules</h2>	<div data-bbox="1209 315 1473 638"> <div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>This Modification would remove the requirement for meetings of the UNC Modification Panel to take place in London.</p>	
<p>Next Steps:</p> <p>The Panel determined that this Self-Governance Modification should be implemented.</p>	
<p>Impacted Parties:</p> <p>High:</p> <p>Low: UNC Modification Panel Members, Alternates, Observers and Invitees</p> <p>None:</p>	
<p>Impacted Codes:</p> <p>None</p>	

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Timetable		 as above
Modification timetable:		 as above
Pre-Modification Discussed (<i>Governance Workgroup</i>)	04 August 2021	Contact: Joint Office of Gas Transporters
Date Modification Raised	05 August 2021	
New Modification to be considered by Panel	19 August 2021	 enquiries@gasgovernance.co.uk
First Workgroup Meeting	01 September 2021	 0121 288 2107
Workgroup Report to be presented to Panel	21 October 2021	Proposer: Phil Lucas National Grid NTS
Draft Modification Report issued for consultation	21 October 2021	 phil.lucas@nationalgrid.com
Consultation Close-out for representations	11 November 2021	 07825 592518
Final Modification Report available for Panel	12 November 2021	Transporter: National Grid NTS
Modification Panel decision	18 November 2021	 as above

1 Summary

What

The UNC Modification Rules currently require that meetings of the UNC Modification Panel take place in London unless the Panel determines otherwise in respect of any meeting. Such a determination would be made by Panel Majority.

This rule has been in place (and has remained unchanged) from the first incarnation of the British Gas TransCo Network Code (01 March 1996) and was subsequently carried forward into the first version of the Uniform Network Code (01 May 2005).

Why

The advent of more flexible working arrangements for individuals and a wider geographical spread of individuals' work locations means that the need for meetings of the UNC Modification Panel to take place in London (and by exception elsewhere) is an unnecessary constraint on the Panel Members and the Code Administrator of the UNC.

Removal of the existing constraints on the location of Modification Panel meetings will provide the Code Administrator with a greater level of flexibility in the arrangement of such meetings thereby optimising costs whilst maintaining the capability of the Modification Panel to fulfil its obligations under the Modification Rules.

How

It is proposed that the requirement for meetings of the UNC Modification Panel to take place in London is removed. Alternatively, it is proposed that meetings of the Modification Panel take place in the location in Great Britain specified by the Code Administrator unless the Modification Panel determines otherwise (i.e. that the meeting take place in a location other than that specified by the Code Administrator). Regarding communication of the meeting location, it is proposed that wherever practical, the Code Administrator provide a minimum notice period of 3 months.

2 Governance

Justification for Self-Governance

Application of Self-Governance procedures is sought because the change proposed is unlikely to have a material effect on the Uniform Network Code governance procedures (nor any of the other aspects described in the Self-Governance criteria). This is because the nature of the change is to merely allow a greater level of flexibility in the location of meetings of the Modification Panel.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup.

It is recommended that the Proposal is issued to the Governance Workgroup for consideration for a period of 2 months. A pre-Modification discussion took place at the Governance Workgroup on 04 August 2021.

3 Why Change?

The UNC Modification Rules Section 5.7.1 currently requires that meetings of the UNC Modification Panel take place in London unless the Panel determines otherwise in respect of any meeting. Such a determination would be made by Panel Majority as per Section 5.1.2(a) of the Modification Rules.

This rule has been in place (and has remained unchanged) from the first incarnation of the British Gas TransCo Network Code (01 March 1996) and was subsequently carried forward into the first version of the Uniform Network Code (01 May 2005).

It is understood that the existing constraint on the location of Modification Panel meetings reflected the work locations of the majority of the members of the UNC Modification Panel and other stakeholders in 1996 and the preference for face-to-face meetings, given the levels of video conferencing technology available at that time. However, the advent of more flexible working arrangements for individuals and the wider geographical spread of individuals' work locations means that the need for meetings of the UNC Modification Panel to take place in London (and by exception elsewhere) is an unnecessary constraint on the Code Administrator of the UNC.

Given this, removal of the existing constraints on the location of Modification Panel meetings will provide the Code Administrator with a greater level of flexibility in the arrangement of such meetings, thereby optimising costs whilst maintaining the capability of the Modification Panel to fulfil its obligations under the Modification Rules.

The inclusion of a minimum notice period for communication of the meeting location is proposed in order to enable parties to effectively plan their time and secure the most efficient travel arrangements. Requiring the Code Administrator to, wherever practical, provide this minimum period of notice recognises that in certain exceptional instances it may not be feasible to meet this minimum notice period requirement (for example sudden unavailability of a venue or the management of the governance of Urgent Proposals).

If this change is not made, the Code Administrator will continue to be obliged to make arrangements for meetings of the Modification Panel to take place in London.

If this change is not made, this may result in higher costs than necessary being incurred by the Code Administrator and individual Panel Members (and other stakeholders) compared to those incurred if more locational flexibility is introduced.

4 Code Specific Matters

Reference Documents

[Current UNC Modification Rules](#)

[UNC Version 1 \(May 2005\)](#) see document 01_10_MR.pdf

[British Gas TransCo Network Code Version 1 \(March 1996\)](#) see page 45

Knowledge/Skills

None.

5 Solution

It is proposed that the requirement for meetings of the UNC Modification Panel to take place in London is removed. Alternatively, it is proposed that meetings of the Modification Panel take place in Great Britain in the location specified by the Code Administrator unless the Modification Panel determines otherwise (i.e. that the meeting take place in a location other than that specified by the Code Administrator).

For the avoidance of doubt, a Modification Panel determination in this context shall be made by Panel Majority as per the Modification Rules Sections 2.1 and 5.1.2(a).

Regarding communication of the meeting location, it is proposed that wherever practical, the Code Administrator provides a minimum notice period of 3 months.

6 Impacts & Other Considerations

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

No.

Consumer Impacts

Minor cost efficiency. Whilst greater efficiencies in the operation of industry governance process may be observed, this is unlikely to have a material impact on consumers. However, any minor cost efficiency may be passed on to consumers via Transporter price control arrangements in the event that code administration costs, over the longer term, are reduced.

What is the current consumer experience and what would the new consumer experience be?

Consumers' experience is not expected to be impacted by implementation of this change.

Impact of the change on Consumer Benefit Areas:

Area	Identified impact
Improved safety and reliability	None
<p>Lower bills than would otherwise be the case</p> <p>Whilst greater efficiencies in the operation of industry governance process may be observed, this is unlikely to have a material impact on consumers. However, any minor cost efficiency may be passed on to consumers via Transporter price control arrangements in the event that code administration costs, over the longer term, are reduced.</p>	Positive

Reduced environmental damage	Positive
Enabling members of the UNC Panel and other stakeholders to optimise travel and other arrangements whilst maintaining effective representation and participation in the business of the Modification Panel may lead to reduced Greenhouse Gas Emissions. Any such reduction is unlikely to be material.	
Improved quality of service	None
Benefits for society as a whole	None

Cross-Code Impacts

None.

EU Code Impacts

None.

Central Systems Impacts

None.

Workgroup Impact Assessment

Panel Questions

1. Proof of capability around communication technology for each location

Workgroup recognises that this is not a requirement of this Modification, and that technology can only be fully tested during a meeting. However, the workgroup did acknowledge that having technology that has been tested is important.

The Joint Office will be responsible for ensuring the chosen location has the appropriate technology to facilitate Panel meetings, ensuring the relevant testing has taken place.

2. How will hybrid working be reflected in solution

The Joint Office will ensure at least 3 months' notice is provided, chosen locations will have been tested to ensure technology works with hybrid meetings (combination of in person and online). The Panel also have the right to veto a location if it is deemed not suitable.

A Workgroup representative requested that the Joint Office produce an assessment of locations and technology to assure Panel that meetings can be managed from other locations.

Criteria to include but not limited to: sound quality, connectivity, experience/engagement of attendees, visibility of attendees, effectiveness of voting etc.

Any location of any meeting will be assessed using the agreed criteria.

3. Impact of other workgroups

Workgroup agreed that there is currently no restriction in UNC around location of Workgroup meetings and this Modification does not intend to change this. However, the same criteria used to assess the effectiveness of Panel meetings should be expanded to Workgroup/Committee meetings.

The Workgroup agrees that the legal text delivers the intent of the solution.

Rough Order of Magnitude (ROM) Assessment

None.

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

Removal of the current constraint on the location of meetings of the Modification Panel better facilitates the objective of the promotion of efficiency in the implementation and administration of the Code by enhancing the ability of the UNC Code Administrator to optimise code administration costs.

Workgroup agrees with the above assessment of the Relevant Objectives.

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.

9 Legal Text

Legal Text has been provided by National Grid NTS and is below. The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

Text Commentary

Reference	Explanation
GENERAL TERMS MODIFICATION RULES	-
Amendment to paragraph 5.7.1	Removes the requirement for meetings of the Modification Panel to take place in London. Establishes a requirement that the location of these meetings (limited to Great Britain) will be specified by the Code Administrator and introduces a requirement that it provide, where practical, no less than 3 months notice of this location.

Text

General Terms

Modification Rules

5 Meetings of the Modification Panel

5.7 Location and form of meetings

Amend paragraph 5.7.1 as follows:

Unless the Modification Panel shall in respect of any meeting of the Modification Panel otherwise determine, meetings of the Modification Panel will take place in ~~London~~ a location in Great Britain specified by the Code Administrator. The Code Administrator shall, wherever practical, provide not less than three months notice of the location of any meeting of the Modification Panel.

10 Consultation

Panel invited representations from interested parties on 21 October 2021. All representations are encompassed within the Appended Representations section at the end of this document.

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

Implementation was unanimously supported in the 3 representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives
Centrica	Support	f) positive
National Grid NTS	Support	f) positive
Northern Gas Networks	Support	f) positive

Please note that late submitted representations will 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

Discussion

The Panel Chair summarised that Modification 0776S would remove the requirement for meetings of the UNC Modification Panel to take place in London.

Panel Members considered the representations made noting that implementation was unanimously supported in the 3 representations received.

Panel Members agreed with respondents in that this Modification allows for flexibility in line with the change in panel members' locales, the advance of technology for remote meetings and the more flexible working arrangements available to the Industry as a whole.

Whilst Modifications affecting Modification Rules would normally require Authority Direction, Panel Members confirmed this Modification is suitable for self-governance.

Consideration of the Relevant Objectives

Based on the two factors below, Panel Members agreed that this Proposal should further Relevant Objective f) the promotion of efficiency in the implementation and administration of the Code:

- The inclusion of a standard notice period of three months allows for maximisation of savings in relation to travel arrangements where utilised.
- This Modification removes the constraint of hosting meetings in London and will enhance the ability of the UNC Code Administrator to optimise code administration costs.

Determinations

Panel Members voted unanimously that no new issues were identified as part of consultation.

Panel Members voted unanimously that Modification 0776S does not have an SCR impact.

Panel Members voted unanimously that there are there are no Cross Code Impacts.

Panel Members voted with 14 votes out of 14, (unanimous) and agreed to implement Modification 0776S.

12 Recommendations

Panel Determination

Panel Members agreed:

- that Modification 0776S should be implemented.

13 Appended Representations

Representation - Centrica

Representation – National Grid NTS

Representation – Northern Gas Networks

These representations are also available at: <https://www.gasgovernance.co.uk/0776>

Representation - Draft Modification Report UNC 0776S

Revision of the Modification Panel Meeting Location Requirement in the Modification Rules

Responses invited by: **5pm on 11 November 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Oorlagh Chapman
Organisation:	Centrica
Date of Representation:	09/11/2021
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

Removing the requirement for meetings of the UNC Modification Panel to take place in London is a sensible proposal and aligns to the flexible working arrangements now available to the Industry as a whole.

Self-Governance Statement: Please provide your views on the self-governance statement.

We believe self-governance is appropriate for this proposal.

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

No comments

Impacts and Costs: What analysis, development and ongoing costs would you face?

There are currently no known associated costs with the implementation of this modification.

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.

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

None identified.

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

No comment.

Representation - Draft Modification Report UNC 0776S

Revision of the Modification Panel Meeting Location Requirement in the Modification Rules

Responses invited by: **5pm on 11 November 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Phil Lucas
Organisation:	National Grid NTS
Date of Representation:	4 th November 2021
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

As the proposer, National Grid NTS supports the implementation of this Modification Proposal.

The existing constraint on the location of meetings of the Modification Panel has been in place since 1996 but is no longer necessary considering more flexible working arrangements for individuals and a wider geographical spread of individuals' work locations. Further, removal of the constraint of hosting meetings in London will enhance the ability of the UNC Code Administrator to optimise code administration costs.

On this basis we continue to believe that implementation would better facilitate the Relevant objective of the promotion of efficiency in the implementation and administration of the Code.

Self-Governance Statement:

We remain of the opinion that the Modification Proposal does not have any material impact to the UNC and therefore application of self-governance procedures to this Proposal is entirely appropriate.

Implementation:

Implementation is sought as soon as practicable following the decision to implement the Proposal. As Self-Governance procedures are applicable, implementation could be

sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

Impacts and Costs:

National Grid is not expected to incur any specific additional costs as a consequence of the implementation of this Proposal.

Legal Text:

We are satisfied that the legal text delivers the intent of the solution identified in this Proposal.

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

We have not identified any such errors or omissions.

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

Not applicable.

Joint Office
enquiries@northerngas.co.uk

8th November 2021

Dear Sir or Madam,

Re: 0776S - Revision of the Modification Panel Meeting Location Requirement in the Modification Rules

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.

Reason for support/opposition:

Please summarise (in one paragraph) the key reason(s)

The removal of the absolute requirement for UNC Panel meetings to be physically held in London allows for flexibility in line with the change in panel members locales and the advance of technology for remote meetings. The inclusion of a standard notice period of three months allows for maximisation of savings in relation to public transport travel arrangements where utilised. Based on these factors we believe this proposal should further Relevant Objective f) *the promotion of efficiency in the implementation and administration of the Code*.

Self-Governance Statement:

Please provide your views on the self-governance statement.

This proposal should follow self-governance procedures as, whilst it seeks to make amendments to the modification rules, it does not seem to be of material impact.

Implementation:

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

This proposal could be implemented sixteen business days after Modification Panel approval, subject to no appeal being raised.

Impacts and Costs:

What analysis, development and ongoing costs would you face?

No required analysis, development or ongoing costs have been identified for NGN as a result of this proposal.

Legal Text:

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

We believe that the legal text will deliver the intent of the Solution.

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

Include details of any impacts/costs to your organisation that are directly related to this.

None identified.

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

None.

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)
Market Services Manager (Industry Codes)
Mobile: 07580 215 743

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Service on 0800 111 999



1100 Century Way
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