















UNC Final Modification Report		At what stage is this document in the process?
<h1>UNC 0708S:</h1> <h2>Re-ordering of the UNC in advance of Faster Switching</h2>		<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p><b>Purpose of Modification:</b></p> <p>This Modification proposes to realign the UNC to match the re-ordering that is in the proposed Legal Text developed for the Switching Programme and discussed at the Workgroup for Request 0630R - <i>Review of the consequential changes required in UNC as a result of the Ofgem Switching Programme</i>.</p> <p>This will ensure that the Uniform Network Code (UNC) structure and ordering matches in both the current UNC and the proposed Legal Text produced for the Faster Switching programme, so that it is easier to i) maintain both versions. ii) identify the specific changes that are in the Central Switching Service (CSS) version that is due to be introduced as part of Faster Switching and iii) Identify potential impacts on the legal text developed for Faster Switching.</p>		
	The Panel determined that this self-governance modification be implemented	
	High Impact:	
	Medium Impact: Shippers, DNOs	
	Low Impact: NTS, Consequential impact to IGTs & CDSP	

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<b>Modification timetable:</b>		 Any questions?
Initial consideration by Workgroup	28 November 2019	Contact: <b>Joint Office of Gas Transporters</b>
Workgroup Report presented to Panel	16 April 2020	 <a href="mailto:enquiries@gasgovernance.co.uk">enquiries@gasgovernance.co.uk</a>
Draft Modification Report issued for consultation	16 April 2020	 0121 288 2107
Consultation Close-out for representations	07 May 2020	Proposer: <b>Tracey Saunders</b>
Final Modification Report available for Panel	11 May 2020	 <a href="mailto:trsaunders@northern-gas.co.uk">trsaunders@northern-gas.co.uk</a>
Modification Panel decision	21 May 2020	 Not provided
		Transporter: <b>Northern Gas Networks</b>
		 as above
		 Not provided
		Systems Provider: <b>Xoserve</b>
		 <a href="mailto:UKLink@xoserve.com">UKLink@xoserve.com</a>

# 1 Summary

## What

The Ofgem Switching Programme (OSP) was formed to introduce a programme of work to develop a faster, more reliable switching service for gas and electricity consumers to switch Supplier. A combined gas and electricity Central Switching Service (CSS) has been established to facilitate the Supplier initiated switching process, known as Faster Switching.

In readiness for this, Ofgem directed Transporters to prepare a version of the UNC in advance of the direction for implementation of Faster Switching. This advance version of the UNC was to include all of the changes that would be needed to facilitate Faster Switching.

As part of the work carried for the Legal text changes Dentons stated the following:

*Before making any changes to TPD Section G we re-ordered the current text:*

- (i) to put the current rules into a much more logical sequence and*
- (ii) to remove the paragraphs which are being moved out of TPD Section G, in order to create a new 'baseline' version against which we could show the CSS/REC related changes.*

*In addition, current TPD Sections G1.19, G5 and G6 have been moved to (respectively) TPD Sections J1.9, TPD Section B, Annex B-3 and TPD Section B8.*

This Modification proposes to realign the current UNC to the new order set out above. This exercise would need to take into account:

- a. Any Modifications that have come into effect since the restructure, and
- b. Any Modifications implemented during the development of this Modification.

In addition, the UNC Validation Rules will need to be checked by the CDSP to identify if any of the code references quoted are impacted by the re-ordering. Any amendments arising from this will need to be agreed by the Uniform Network Code Committee (UNCC).

## Why

Amending the current UNC to match the re-ordered version will result in at least 4 benefits:

- a. It will allow parties to be fully prepared by helping to identify:
  - the changes that the faster switching will bring;
  - where their obligations will change
  - where new obligations will be introduced,
- b. It will make amending the prepared faster switching Legal Text version easier so that this can be updated for all implemented Modifications between approval of this Modification and the implementation date for Faster Switching. This will save both cost and time overall.
- c. It will allow, for example, compliance schedules etc. which are maintained by companies to be updated with new UNC code references in advance of the CSS.
- d. It will assist Proposers, the Joint Office and Panel members in identifying where any new Modification is potentially impacting on the SCR (Legal Text prepared for the Switching Programme) and should aid in assessing the materiality of the impact.

## How

To introduce the re-ordered version of the UNC (without any Faster Switching related changes applied) as the new current version of the UNC, taking account of any Modifications implemented up to the date of this Modification being implemented.

## 2 Governance

### Justification for Self-Governance

This Modification is merely proposing to re-order specific sections of the UNC to mirror the proposed structure changes set out in the legal text prepared for Faster Switching (prior to the CSS changes being applied). Therefore, this Modification makes no changes to UNC parties rights or obligations, has no material impact on competition or UNC governance and therefore, should be considered as suitable for Self-Governance.

### Requested Next Steps

This modification should:

- be considered a non-material change and subject to self-governance
- be assessed by a Workgroup

The Workgroup believes that the change mapping should be comprehensively cross checked, and therefore, recommends 3 workgroup meetings to allow all interested parties to monitor and engage in this process.

It should be noted that the actual changes related to Faster Switching are not part of this Modification, as this has already been included under the Faster Switching Legal Text that has been submitted to the Ofgem Switching Programme. This Modification Proposal's purpose is to introduce the re-ordering element at an earlier stage to aid transition.

## 3 Why Change?

The current TPD Section G has undergone significant change since first drafted at the time of Network Code implementation in 1996. As a result, the section has grown significantly in length, become less well ordered in terms of the logical sequence and positioning of paragraphs and the section now incorporates rules which would be better positioned in different Sections within the TPD.

As part of the work undertaken to identify the changes to UNC that would be needed to support implementation of Faster Switching it was decided to undertake a Section G re-ordering exercise to rectify some of the issues noted above. It was felt this work would be helpful for a number of reasons as follows:

- a. It will allow UNC Parties to easily identify the changes to Section G that would result from the Faster Switching programme and which might impact on their Section G obligations, and which in turn should aid them in ensuring they fully understand the scope and scale of the changes and are able to plan and prepare accordingly.
- b. It will make amending the 'on the shelf' version of Section G easier so that this can be updated to take into account changes to Section G which take effect from the date of this Modification until the new Section G is implemented when Faster Switching goes live . This will save both cost and time overall.

- c. It will allow for compliance schedules etc. which are maintained by UNC Parties to be updated with new TPD references in advance of the Faster Switching programme being implemented, so facilitating industry planning and preparation.
- d. It will assist Proposers, the Joint Office and Panel members in identifying where any future Modification will impact on the SCR and therefore should aid in assessing the materiality of the impact of any such Modification. This should allow for a more informed assessment to be provided to the Authority should this be required.

## 4 Code Specific Matters

### Reference Documents

None

### Knowledge/Skills

Knowledge of the UNC

## 5 Solution

To implement the re-ordered version of Section G prepared at the time of the work relating to the wider changes needed to UNC to support Faster Switching, and to update the re-ordered Section G to account for Modifications to Section G implemented since the Faster Switching drafting exercise ended in May 2019.

This will involve the following drafting components:

- Preparing a new re-ordered version of Section G, based on the Faster Switching document.
- Repositioning some existing paragraphs in Section G to elsewhere in the TPD, in particular Sections G1.19, G5 and G6 which will be moved to (respectively) to TPD Sections J1.9, TPD Section B, Annex B-3 and TPD Section B8.
- Updating the re-ordered and re-positioned text to take into account any Modifications implemented since the Faster Switching drafting exercise ended in May 2019.
- Ensuring all TPD references are checked and renumbered as required.

Amend any incorrect cross references as per the table below

Code section & paragraph in current UNC	Cross-Reference in current UNC	What should cross reference be in current UNC	Code section & paragraph in proposal 0708	What correct cross reference maps to in proposal 0708
TPD G 1.15.1	Incorrect - 1.16, 1.16.2, 1.16.2(e) Correct - Annex G-2	1.15, 1.15.2, 1.15.2(e), Annex G-2	TPD G 9.2.1	9.2, 9.2.2, 9.2.2(d), Annex G-4
TPD G1.15.2	Incorrect - 1.16.1	1.15.1	TPD G 9.2.2	9.2.1

TPD G1.15.3	Incorrect - 1.16.1	1.15.1	TPD G 9.2.3	9.2.1
TPD G1.15.3(c)	Incorrect - 1.16.1, 1.16.2	1.15.1, 1.15.2	TPD G 9.2.3(c)	9.2.1, 9.2.2
TPD G1.15.4	Incorrect - 1.16.5, 1.16.3(c)	1.15.5, 1.15.3(c)	TPD G 9.2.4	9.2.5, 9.2.3(c)
TPD G1.15.4(b)	Incorrect - 1.7.19 Correct - 3.2.4	3.2.4	TPD G 9.2.4(b)	1.7.19 reference removed, 6.12.4
TPD G1.15.5	Incorrect - 1.16.4, 1.16.3(c), 1.16.2(e)	1.15.4, 1.15.3(c), 1.15.2(e)	TPD G 9.2.5	9.2.4, 9.2.3(c), 9.2.2(e)
TPD G1.16.1 Final Sentence	Incorrect - 1.17.6	1.16.6	TPD G 6.2.1 Final Sentence	6.2.6
TPD G1.16.2	Incorrect - 1.17	1.16	TPD G 6.2.2	6.2
TPD G1.16.4	Incorrect - 1.17.3(b)	1.16.3(b)	TPD G 6.2.4	6.2.3(b)
TPD G1.16.5(c)	Incorrect - 1.17.4	1.16.4	TPD G 6.2.5(c)	6.2.4
TPD G1.16.6	Incorrect - 1.17.5	1.16.5	TPD G 6.2.6	6.2.5
TPD G1.16.7	Incorrect - 1.17.1	1.16.1	TPD G 6.2.7	6.2.1
TPD G1.16.8	Incorrect - 1.17.7	1.16.7	TPD G 6.2.8	6.2.7
TPD G1.17.1	Incorrect - 1.18	1.17	TPD G 3.5.1	3.5
TPD G1.17.2	Incorrect - 1.18.1, 1.18.3	1.17.1, 1.17.3	TPD G 3.5.2	3.5.1, 3.5.3
TPD G1.19.1 Final Sentence	Incorrect - 1.20.3, 1.20.2	1.19.3, 1.19.2	TPD J1.9.1 Final Sentence	TPD J1.9.3, TPD J1.9.2
TPD G1.19.3	Incorrect - 1.20	1.19	TPD J1.9.3	TPD J1.9.1
TPD G1.19.4	Incorrect - 1.20.3	1.19.3	TPD J1.9.4	TPD J1.9.3, TPD J1.9.2
TPD G1.23.2(a)	Incorrect - 1.7.13	1.7.14	TPD G 1.7.2(a)	9.1.13
TPD G1.7.14(b)	Incorrect - 1.7.13	1.7.14	TPD G 9.1.13(b)	9.1.13
TPD G4.2.1	Incorrect - 1.18	1.17	TPD G 1.2.1	3.5

TPD G4.2.1(a)	Incorrect - 1.18	1.17	TPD G 1.2.1(a)	3.5
TPD G4.2.1(b)	Incorrect - 1.18.3	1.17.3	TPD G 1.2.1(b)	3.5.3
TPD E6.6.3(c)	Incorrect - G1.7.10(b)(iv)	G1.7.7(b)(iv)	TPD E6.6.3(c)	G9.1.6(c)

## 6 Impacts & Other Considerations

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

No impact as it is only re-ordering the existing text.

However, we would like to highlight that careful assessment by the Joint Office and industry will be required for any future new modifications or inflight modifications in relation to the relevant UNC TPD Sections of Code that will change if this Modification were implemented.

It is recommended that the Proposers of any new / inflight modifications review current Code Legal Text ensuring that if Modification is implemented that the Legal Text considers these impacts.

### Consumer Impacts

None. This is a re-ordering of the existing codes, and there are no new, amended, or removed obligations.

### Cross Code Impacts

The Workgroup believes there will be a consequential impact on the IGT UNC and will work with impacted parties.

The Workgroup also believes that there may be an impact on the UNC Validation Rules and will work with the CDSP.

### EU Code Impacts

None.

### Central Systems Impacts

No system changes are envisaged as this is a re-ordering of the existing text only and no obligations are added, changed or removed.

### Workgroup Impact Assessment

There remains further work to do assessing the Modification to include a walk-through of the legal text.

### Rough Order of Magnitude (ROM) Assessment

N/A

## 7 Relevant Objectives

Impact of the modification on the 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

The Workgroup believes this Modification proposal furthers Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code as it re-orders the UNC to match the baselined version that has been submitted to support the Faster Switching changes. It will also ensure that the Faster Switching changes are easier to identify as these will be the only differences to the live UNC following the implementation of this Modification Proposal.

## 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. This date should take into account and be in-line with the relevant impacted changes to the IGT UNC and UNC Validation Rules.

## 9 Legal Text

Legal Text has been provided by Northern Gas Networks and is published alongside this report.

The Workgroup has not been able (due to meeting quoracy issues) to fully review the Legal Text.

## 10 Consultation

Panel invited representations from interested parties on 16 April 2020. The summaries in the following table are provided for reference on a reasonable endeavours' basis only. It is recommended that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Implementation was unanimously supported in the 9 representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
Cadent	Support	f) – positive	<ul style="list-style-type: none"> <li>• Supports this Modification as it separates the amendments to the UNC since it was drafted in 1996 from the material changes to the UNC as a result of the 'Faster Switching' Programme's legal text which will bring forward the realignment of the UNC.</li> <li>• Believes that this will also make the assessment of impacts of new Modification on the Faster Switching Programme's text and eventual alignment of the text within the UNC more efficient.</li> <li>• Notes that the Modification could be implemented sixteen business days after UNC Panel decision.</li> <li>• Is satisfied that the legal text is fit for purpose. They agree that the Proposer of the Modification and external lawyers have both carried out significant validation work on the UNC text and provided the necessary tables and documents for parties to assess the text themselves outside of workgroup.</li> <li>• Noted that there are no additional impacts and costs identified.</li> </ul>
ESP Utilities Group	Support	f) – positive	<ul style="list-style-type: none"> <li>• Supports this Modification as it seeks to bring clarity to the UNC with respect to changes associated with Faster Switching and improving administration of the code in advance of the implementation of Ofgem's Switching Programme.</li> <li>• Agrees this should be a self-governance Modification.</li> <li>• Supports implementation sixteen business days after UNC Panel approval, conditional on the date aligning with the implementation of the equivalent IGT UNC modification (IGT137), to retain clarity and the high quality of administration of both codes within the industry.</li> </ul>

			<ul style="list-style-type: none"> <li>• Notes no direct costs for implementation of this Modification has been identified. However, noted that s given the cross-code impacts on the IGT UNC, resources will be required to assess the impact and implementation within the IGT UNC to ensure the objectives of the code are met.</li> <li>• Satisfied that the legal text will deliver the solution's intent.</li> </ul>
National Grid	Support	f) – positive	<ul style="list-style-type: none"> <li>• Supports this proposal and noted that the implementation of faster switching arrangements will materially change the governance of the change of supplier process and ultimately result in the removal of the Supply Point transfer rules from TPD Section G for the majority of Supply points, believes that whilst this proposal does not seek to achieve this, implementation would re-order this section into a more logical sequence and migrate a small number of additional terms into more appropriate sections of the UNC.</li> <li>• Believes that this Modification does not advocate any change to the rights and obligations of parties under the Code, but agrees that the proposed re-ordering will provide administrative benefits ahead of, and during, the eventual implementation of the Faster Switching arrangements and therefore agrees that implementation of this reordering better facilitates efficiency in the implementation and administration of the Code.</li> <li>• Agrees that the Modification is suitable for self-governance given the absence of proposed change to the rights and obligations of Code parties which will have no material effect on parties or arrangements.</li> <li>• Notes no lead time is required for implementation.</li> <li>• Confirmed no analysis, development or ongoing costs as a consequence of implementation will be incurred.</li> <li>• Satisfied that the legal text delivers the intent of the Modification and Welcomed the due diligence exercises undertaken by NGN and Joint Office to verify that legal text achieves the stated objective of the Modification to re-order the relevant section of the UNC.</li> </ul>
Northern Gas Networks	Support	f) - positive	<ul style="list-style-type: none"> <li>• As the Proposer of this Modification, supports this proposal as the re-ordering of the UNC to match the baseline legal text for Ofgem's Faster Switching programme, as this should ensure that it is easier to identify proposals which impact the Faster Switching Significant Code Review (SCR).</li> <li>• Believes This proposal also gives parties the opportunity</li> </ul>

			<p>to make necessary internal compliance reference updates ahead of the Faster Switching implementation, thus furthering Relevant Objective f) promotion of efficiency in the implementation and administration of the Code.</p> <ul style="list-style-type: none"> <li>• Agrees that this proposal should follow self-governance procedures as it is only seeking to re-order existing sections of the UNC in preparation for Ofgem's Faster Switching programme and proposes no changes to party obligations, rights, competition or UNC governance.</li> <li>• Notes that the Modification could be implemented sixteen business days after UNC Panel approval, subject to no appeal being raised, although notes that it would be beneficial for this to be in line with the relevant changes to the IGT UNC and UNC Validation Rules.</li> <li>• Advised that no analysis, development or ongoing costs have been identified.</li> <li>• Believes the legal text provided delivers the solution set out in the Modification.</li> </ul>
ScottishPower	Support	f) - positive	<ul style="list-style-type: none"> <li>• Supports this Modification as it will positively impact Relevant Objective f) and will promote efficiency in the implementation and administration of the UNC by making sure that Faster Switching changes made to UNC are easy to identify. This will assist in the development of Retail Energy Code (REC).</li> <li>• Agrees the Modification should be subject to self-governance.</li> <li>• Supports implementation sixteen business days after UNC Panel approval but noted there is an equivalent Modification in IGT UNC 137, and the implementation dates for this Modification and IGT137 should align.</li> <li>• Noted that no additional impacts and costs were identified.</li> </ul>
SGN	Support	f) - positive	<ul style="list-style-type: none"> <li>• Supports this Modification as it will further Relevant Objective f), promoting efficiency in the implementation and administration of the UNC by ensuring that the Faster Switching changes made to UNC are easy to identify, thus facilitating development of the Retail Energy Code (REC).</li> <li>• Agrees that the Modification should be subject to self-governance.</li> <li>• Agrees implementation should be sixteen business days after UNC Panel decision, subject to no appeals being raised.</li> </ul>

			<ul style="list-style-type: none"> <li>• Satisfied that the legal text delivers the intent of the Modification.</li> <li>• Noted that no additional impacts and costs were identified.</li> </ul>
SSE Energy Supply Limited	Support	f) - positive	<ul style="list-style-type: none"> <li>• Supports this Modification as it will ensure that the UNC structure and ordering matches the current UNC and the proposed legal text produced for the Faster Switching Programme.</li> <li>• Agrees the Modification meets self-governance criteria.</li> <li>• Supports implementation as soon as possible in line with self-governance timescales.</li> <li>• Satisfied that the legal text delivers the intent of the solution.</li> <li>• Noted that no additional impacts and costs were identified.</li> </ul>
Utilita	Support	f) - positive	<ul style="list-style-type: none"> <li>• Supports this Modification as it will support the Relevant Objective f) and aid in the identification of Faster Switching changes to the Uniform Network Code (UNC) since 2019 and future modifications.</li> <li>• Agrees that this Modification should be subject to self-governance.</li> <li>• Agrees on implementation timescales as laid out within this Modification.</li> <li>• Satisfied that the legal text published alongside the Modification on 2nd April 2020 and additional information published 22nd April 2020 will deliver the desired outcome defined by Relevant Objective f).</li> <li>• Advised that no additional impacts and costs were identified.</li> </ul>
Wales & West Utilities	Support	f) - positive	<ul style="list-style-type: none"> <li>• Supports this Modification as it reorders the UNC text into the same order as the Faster Switching SCR text. It will therefore give people time to get used to the revised order and therefore to better able to identify the changes from the Faster Switching text. It therefore furthers Relevant Objective f) - efficiency in the administration of the UNC.</li> <li>• Satisfied the self-governance criteria has been met as the Proposer has ensured that the changes do not include any changes to text other than the reordering and consequential changes and minor typographical error corrections.</li> <li>• Agrees that implementation could be sixteen business days after UNC Panel decision to implement subject to no</li> </ul>

			<p>appeal being raised.</p> <ul style="list-style-type: none"> <li>• Confident that the rigorous scrutiny by the Proposer has identified and corrected any errors in the original Legal text draft.</li> </ul>
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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 Discussion

### Discussion

The Panel Chair summarised that this Modification seeks to realign the UNC to match the re-ordering that is in the proposed Legal Text developed for the Switching Programme and discussed at the Workgroup for Request 0630R - Review of the consequential changes required in UNC as a result of the Ofgem Switching Programme. The overall aim is to ensure that the Uniform Network Code (UNC) structure and ordering matches in both the current UNC and the proposed Legal Text produced for the Faster Switching programme, so that it is easier to:

- i) Maintain both versions.
- ii) Identify the specific changes that are in the Central Switching Service (CSS) version that is due to be introduced as part of Faster Switching and
- iii) Identify potential impacts on the legal text developed for Faster Switching.

Panel Members considered the 9 representations made, noting that implementation was unanimously supported in all.

Panel Members welcomed the IGT UNC Panel Chair to the UNC Panel meeting. Panel Members noted the IGT UNC Panel Chair's concern relating to the implementation date and fully appreciated cross code working for this issue.

Panel Members noted the clarification put forward by the IGT UNC Panel Chair that IGT UNC 137 is scheduled to be discussed by the IGT Panel in June 2020. Implementation can be done through an extraordinary release mid-end July 2020, contingent on other UNC related documents being ready for implementation. This is because the IGT Code includes references within it.

Panel Members noted that determination of a suitable implementation date will involve a discussion between the relevant Transporter, the Proposer, the Joint Office and CDSP (as needed), the IGT Panel Chair and if necessary, the Authority.

Panel Members observed that, whilst there are no direct impacts on the SCR, the Modification 0708S helps facilitate the management to the legal text of the Switching SCR.

Panel welcomed Ofgem's clarification of its view that whilst Modification 0708S is clearly related to the Switching SCR, the intent of Modification 0708S is to be implemented in advance of and to further facilitate future modifications that may be required as a direct consequence of changes to the switching arrangements. Further, Panel Members noted Ofgem's clear direction that Modification 0708S may be made.

## Consideration of the Relevant Objectives

Panel Members agreed that this Modification should have a positive impact on Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code; as it re-orders the UNC to match the baselined version that has been submitted to support the Faster Switching changes. It will also ensure that the Faster Switching changes are easier to identify as these will be the only differences to the live UNC following the implementation of this Modification Proposal.

## Determinations

Panel Members voted unanimously that Modification 0708S does not have an SCR impact.

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

Panel Members voted unanimously to implement Modification 0708S.

## 12 Recommendations

### Panel Determination

Panel Members agreed that Modification 0708S should be implemented.