



# 0864: Update of UNC Code Communication Methods

## 1. Scope & Considerations

**Gavin Williams**

Governance Workgroup

4<sup>th</sup> December 2023





Obligated communication methods between parties (e.g. Transporters and Shippers) is clearly stated within UNC documents



At present within the UNC General, TPD, OAD and IGTAD documents, such communication should take the form of telephone or facsimile (fax)



Facsimile is no longer a principle communication method across the gas industry. Email, EDSS and Fact24/ANS offer efficient and reliable alternatives

- There are 80 references to facsimile/fax within the documents listed in **Table 1**
- 64% of all references are within the General document, and 31% within the TPD.
- The specific locations of all 80 references are identified in the accompanied **Facsimile References** spreadsheet

**Table 1:** Summary count of Facsimile/fax references

Document	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

# Why change?

**PSTN networks, employed by facsimile machines, will be switched off nationally** in December 2025. New systems will no longer be compatible with or offer fax capability\*

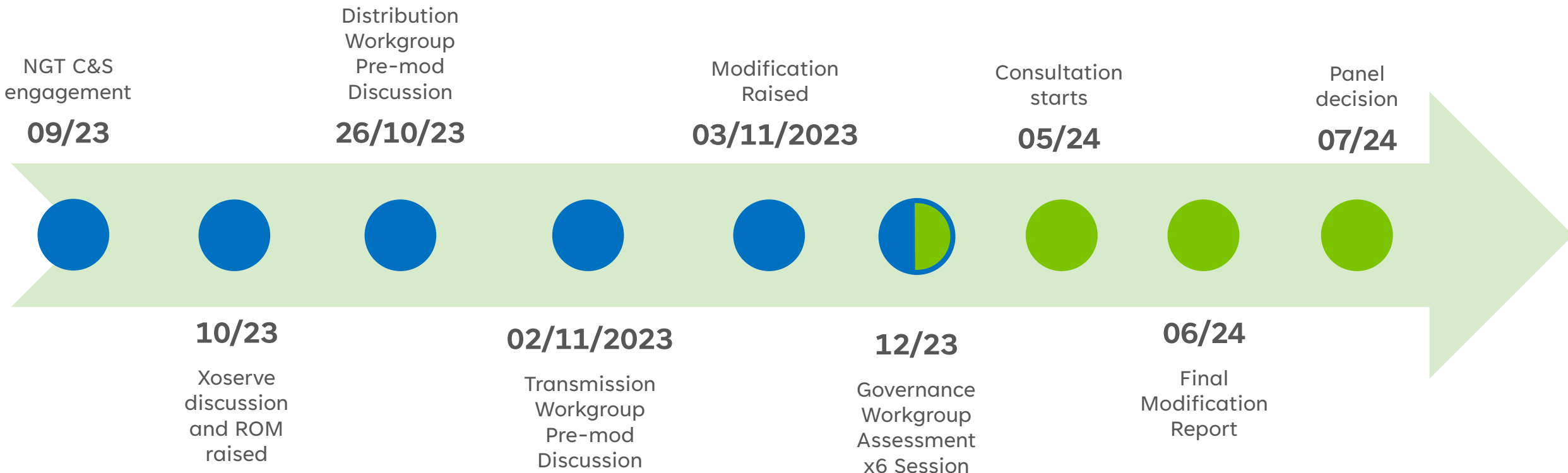
Facsimile produces a substantial quantity of paper and cartridge waste

Retrieving and transposing information from facsimiles requires greater labour demands



We propose to replace all references to ‘**facsimile**’ with ‘**email**’, providing two UNC referenced communication methods moving forwards: telephone and email\*. This will ensure compliance with UNC code when parties communicate via alternative methods to facsimile

Track-change documents, a comparison table and reference summary table will all be provided as supplementary material to a submitted modification application clearly identifying all proposed changes within the UNC General, OAD, TPD, and IGTAD documents



# Modification Scope

1. Owing to time-sensitive external driver, NGT proposes **0864** is limited to **housekeeping** with **scope restricted** to:

- Removal of facsimile from Code
- Fax replacement with alternative Code Communication method
- Tidy-up spelling of 'email'

2. Update of subsidiary documents and processes external to Code can commence outside of the Modification following implementation

3. IGT UNC update is independent of UNC Modification and may be considered by IGT at IGT Workstream

4. Network Contingency consideration beyond 0864 scope and objectives. 0864 is largely a housekeeping Modification.

Beyond scope

Linked to Modification

**0864 Scope**

Removal of facsimile from UNC Code and replacement with alternative (email proposed) communication method before December 2025

Tidy up spelling of 'email'

CDSP Central Systems + UK Link

NEAs and NExAs (NGT Connections)

IGT UNC

Network contingency measures

EBC Rules (EBCC)

**Dx feedback:** *“Is anybody still using facsimile? Is there an understanding of the impact to these users?”*

- NGT do not require facsimile to communicate with wider gas industry moving forwards
- Alternative methods have now superseded facsimile (e.g. EDSS, Fact24)

Workgroup: Are non-NGT stakeholders using facsimile still, e.g. Shippers and GDNs?

Workgroup: What processes do you still require facsimile communication for?



**Dx Feedback:** *“A legal interpretation of the solution will be needed to clarify that this method is the most appropriate one (in relation to delivery of email). A User can say they did not receive an email. Is email as legally robust as facsimile?”*

- Detail on sending/receiving Notices (*“any communication... to be given by one Party to another under the Code”*) by email is outlined in Uniform Network Code – General Terms – Section B General **5.2 Notices by delivery, post, email or facsimile**
- **5.2.5** *“Any notice shall be deemed to have been received: (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.”*
- **5.2.8** *“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.”*

Workgroup: What are the alternative universal options to email that can be implemented swiftly ahead of PSTN switch-off?

# Next steps

- Monday 4<sup>th</sup> December 2023 – Scope & Considerations ✓  
Agreement on facsimile replacement communication method
- Monday 8<sup>th</sup> January 2024 – Review references
- Monday 5<sup>th</sup> February 2024 – Review amended legal text
- Thursday 14<sup>th</sup> March 2024 –
- Thursday 11<sup>th</sup> April 2024 –
- Thursday 16<sup>th</sup> May – UNC Modification Panel deadline

**Thank you**

