









UNC Modification	At what stage is this document in the process?
<h1 data-bbox="134 322 655 414">UNC 0864:</h1> <h2 data-bbox="134 450 839 584">Update of UNC Code Communication Methods</h2>	
<p><b>Purpose of Modification:</b></p> <p>This modification seeks to align obligated Code Communication methods with future communication network changes, attributable to national PSTN decommissioning, to prevent undue disruption to the GB gas industry.</p>	
<p><b>Next Steps:</b></p> <p>The proposed change has been introduced to industry at the Distribution Workgroup (26<sup>th</sup> October 2023) and Transmission Workgroup (2<sup>nd</sup> November 2023) where the Modification was welcomed, and additionally advertised via the Operational Forum (19<sup>th</sup> October 2023).</p> <p>Following industry discussion, the Proposer now recommends that this Modification should be:</p> <ul style="list-style-type: none"> <li>• subject to Self-Governance</li> <li>• assessed by a Workgroup</li> </ul> <p>This Modification will be presented by the Proposer to the Panel on <b>16 November 2023</b>. The Panel will consider the Proposer’s recommendation and determine the appropriate route.</p>	
<p><b>Impacted Parties:</b></p> <p>Low: All parties currently obligated by UNC Code Communication via facsimile</p>	
<p><b>Impacted Codes (Replacement of Facsimile):</b></p> <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>	

**Impacted Codes (Standardisation of Email):**

- UNC General: Sections B & D
- Transportation Principal Document (Sections S & V)

Contents		?	Any questions?
1	Summary	3	Contact: Joint Office of Gas Transporters
2	Governance	3	 <a href="mailto:enquiries@gasgovernance.co.uk">enquiries@gasgovernance.co.uk</a>
3	Why Change?	4	 0121 288 2107
4	Code Specific Matters	5	Proposer: Gavin Williams National Gas Transmission
5	Solution	6	 <a href="mailto:gavin.williams@nationalgas.com">gavin.williams@nationalgas.com</a>
6	Impacts & Other Considerations	7	 +44(0)7935353142
7	Relevant Objectives	8	Transporter: National Gas
8	Implementation	9	 <a href="mailto:gavin.williams@nationalgas.com">gavin.williams@nationalgas.com</a>
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**Timetable**

Modification timetable:	
Pre-Modification Discussed at Dx	26 October 2023
Pre-Modification Discussed at Tx	02 November 2023
Date Modification Raised	02 November 2023
New Modification to be considered by Panel	16 November 2023
First Workgroup Meeting	TBC December 2023
Workgroup Report to be presented to Panel	15 February 2024
Draft Modification Report issued for consultation	16 February 2024
Consultation Close-out for representations	08 March 2024
Final Modification Report available for Panel	15 March 2024
Modification Panel decision	18 April 2024

## 1 Summary

### What

This housekeeping Code Modification updates prescribed UNC Code Communication methods to align with future Ofcom-led physical communication changes that will be implemented nationally. This will require the replacement of the Code Communication method 'facsimile' within UNC documents with an alternative Code Communication method.

### 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, and thus no longer capable of meeting obligated Code Communication services as prescribed within the UNC. 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 after parties 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 replaced with an alternative approved method. The suggested method which this Modification proposes is 'email'. 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 and licenses.

### Standardisation of References to Email

In addition to the above, this Modification will standardise Code Communication references to email within the UNC General and TPD documents. Currently, both formats of 'electronic mail' ('email' and 'e-mail') are used interchangeably within UNC, which may result in particular conditions being omitted from document searches.

Owing to this Modification proposal replacing 80 references to facsimile/fax, in turn adding 59 additional new references of 'email' to Code, it is an ideal opportunity to simultaneously conduct some housekeeping to standardise all email references. This will result in 10 identified cases of 'e-mail' being replaced with 'email'.

## 2 Governance

### Justification for Self-Governance

This Modification meets the requirements for Self-Governance and there are no identified material impacts. This is a housekeeping Modification that will ensure all UNC parties across the GB gas industry remain compliant after physically switching from facsimile to digital communication alternatives. As such, shippers, DNOs, IGTs and the NTS will all benefit equally, and no single party will be discriminated against because of this Modification.

## Requested Next Steps

This Modification should:

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

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.

## 3 Why Change?

Agreed methods for obligated Code Communication between UNC parties are clearly outlined within UNC documents – explicitly telephone and facsimile for certain code conditions. 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 retirement of PSTN analogue networks on which facsimile hardware operate 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 substitution of ‘facsimile’ references to ‘email’.

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. 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. Recipients will therefore need to ensure email accounts are monitored; Code pertaining to party responsibility for fax/telephone monitoring (“*...at all times on each Day one of such representatives is available and capable of being so contacted...*”) will remain unchanged. It is suggested that parties use a shared email account (e.g. ‘.Box’) to facilitate the effective monitoring of incoming emails, though this would not be prescribed. Additionally, ‘read-receipts’ could be used to provide assurance over email delivery, though this would be agreed bi-laterally between parties and not prescribed in UNC. Emails can be deemed to have been received as per the guidance referenced above in **UNC General Terms, Section B, 5.2**.

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. 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

There is an historical Modification (Request 0590, raised by EON and presented to 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) now forces the adoption of digital solutions to facsimile obsolescence. For the past 5 years, Fact24 has been successfully utilised in the deployment of emergency communications to 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 fax machines were not required to transmit any emergency communications. This evidence addresses earlier Panel concern that was raised on 21 July 2016 and satisfies that the switch to email will have no material impact on safety during a network emergency.

### 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](#)

## 5 Solution

A 'find and replace' exercise has been undertaken to update all references of both 'facsimile' and 'fax' as can be seen in the below table:

Existing UNC text	Updated UNC text
'Facsimile'	'Email'
'Fax'	'Email'
'Facsimile number'	'Email address'
Whole facsimile/fax sections	<u>Deleted</u>

References of 'facsimile' and 'fax' have been replaced with 'email'. References of 'facsimile number' have been replaced with 'email address'. Sections of code specifically pertaining to facsimile (UNC General Document 5.25(c) and UNC General Document 5.26) have been deleted, with the itemised numbering of legal text conditions adjusted accordingly.

All updates to 'facsimile' Code Communication replacement to 'email' are clearly marked in the legal text overview provided in **Appendix 1**. A summary of changes has been provided in **Appendix 2**.

### 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 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 industry during Pre-Modification industry discussions.

### Standardisation of References to Email

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'

10 references of 'e-mail' have been replaced with 'email'. All updates are clearly marked in the legal text provided in **Appendix 3**. A summary of changes has been provided in **Appendix 4**.

## 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 is a housekeeping Modification to ensure Code Communication aligns with physical communication method changes, whilst simultaneously standardising 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
<p>Reduced environmental damage</p> <p>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.</p>	Positive
Improved quality of service	None
<p>Benefits for society as a whole</p> <p>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.</p>	Positive

## Cross-Code Impacts

A 'mirror-modification' within the IGT Code may be raised separately to support with a standardised one-off Code Communication change across the whole GB gas industry network.

## EU Code Impacts

None.

## Central Systems Impacts

A ROM has been raised with Xoserve who operates as the CDSP. They are exploring the potential for any Central Systems impacts. Due to the industry-wide impacts associated with the 2025 PSTN switch-off, Xoserve has also raised a Change Proposal.

# 7 Relevant Objectives

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

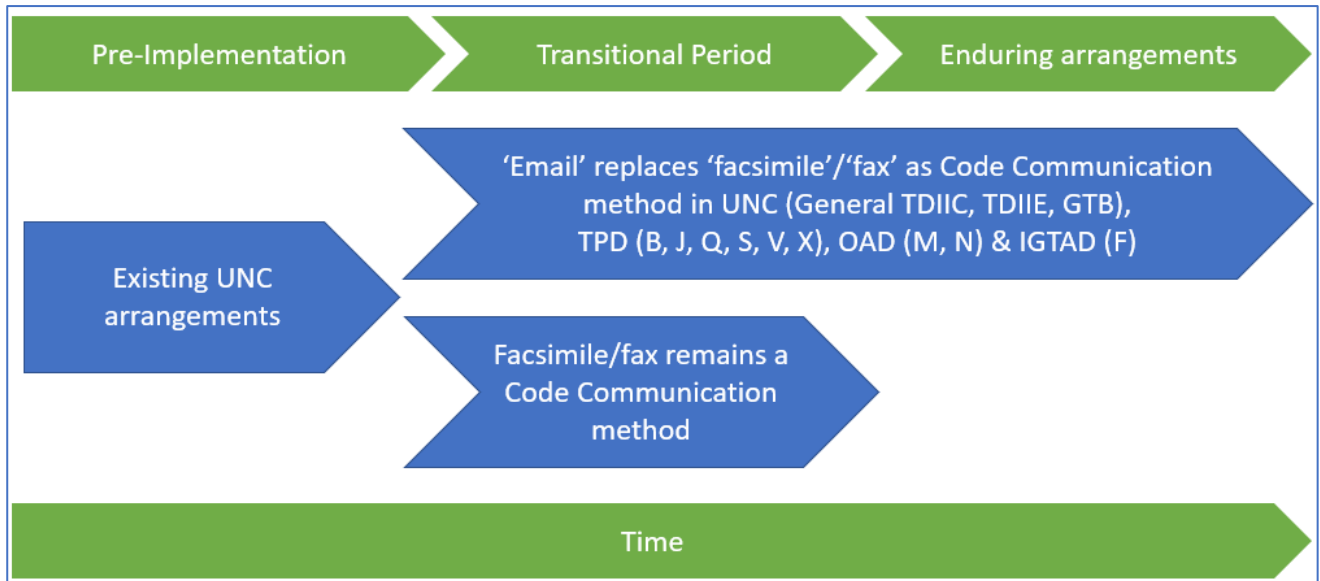
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of 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



## 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.

It is suggested that the implementation of this Code Modification proposal would take a phased approach. This would allow both facsimile and email to run concurrently for a fixed period until a deadline for fax cessation is reached. Email would replace facsimile within UNC (as per **Appendix 1**) from the date of implementation. The temporary continuation of facsimile would manifest itself as transitional rules for the duration of this window. An Implementation flowchart is provided below:



## 9 Legal Text

### Text Commentary: Facsimile Replacement

The following documents have had legal text modified to reflect the Code Communication update from facsimile to email, 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: Email 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)

Again, 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 3**.

## **10 Recommendations**

### **Proposer's Recommendation to Panel**

Panel is asked to:

- Refer this proposal to a Workgroup for assessment.