

**UNC Workgroup 0708S Minutes**  
**Re-ordering of the UNC in advance of Faster Switching**

**Monday 02 December 2019**

**at Radcliffe House, Blenheim Court, Warwick Road, Solihull B91 2AA**

**Attendees**

Rebecca Hailes (Chair)	(RH)	Joint Office
Maitrayee Bhowmick-Jewkes (Secretary)	(MBJ)	Joint Office
Andy Clasper	(AC)	Cadent
Guv Dosanjh	(GD)	Cadent
Helen Cuin	(HCu)	Joint Office
Oorlagh Chapman*	(OC)	Centrica
Clare Cantle-Jones*	(CCJ)	SSE
Phil Lucas	(PL)	National Grid
Tracey Saunders	(TS)	NGN
Teresa Thompson*	(TT)	National Grid
David Mitchell*	(DM)	SGN
Kirsty Dudley*	(KD)	EON
Anne Jackson*	(AJ)	IGT Panel Chair
Penny Garner	(PG)	Joint Office

*\*via teleconference*

Copies of all papers are available at: <http://www.gasgovernance.co.uk/0708/021219>

The Workgroup Report is due to be presented at the UNC Modification Panel by 19 March 2020.

**1.0 Outline of Modification**

Rebecca Hailes (RH) introduced the Modification and explained that it is looking to reorder the Uniform Network Code (UNC) and there will be three (possibly four) meetings to review and progress the Modification before the Workgroup Report is presented to Panel in time for the March 2020 meeting..

Tracey Saunders (TS), the Proposer, then explained the aims of the Modification further to the Workgroup. She clarified that this arose as part of the work that is currently being carried out by Dentons, the solicitors who are drafting the Legal Text for the Central Switching Service (CSS). In order to draft the new text for CSS, they had to reorder the UNC as it stands, as the original structure could not support the additions and amendments for the CSS legal text. The changes to the code to add the CSS text have been built on top of the restructured code.

This Modification proposes to isolate the restructured code which will reorder UNC TPD Section G to put the current rules into a much more logical sequence. The CSS changes will follow on after this Modification. Essentially this Modification will not change the content of the current version of the UNC, only its structure. TS told the Workgroup that Dentons had provided a comparison table which details which section of the code is being changed, and what the change is.

TS further clarified that when the final text for CSS comes into being, there may be inserted clauses which are not yet available. If these are identified, TS will ask Dentons to put in a place holder into the text for Modification 0708S for future inserted text. She confirmed that analysis is being done at present to capture any such clauses that may be inserted in the code in the future.

Kirsty Dudley (KD) asked what the benefit would be by amending the UNC prior to the CSS changes, instead of making that changes all at once. TS advised that there were a number of benefits from this exercise, such as:

- More easily identify where there are going to be changes in obligations as part of Faster Switching.
- Allow easier maintenance of the 'prepared version' of Legal Text for CSS and current UNC version in unison
- Allow companies to update any references in readiness (e.g. compliance schedules)
- More easily identify where new Modification proposals impact the SCR

TS informed the Workgroup that she has discussed this Modification with Ofgem and has their support as they believe that it will add clarity. Workgroup noted that Ofgem was not present at this meeting.

Phil Lucas (PL) asked to confirm that this Modification therefore at the highest level did not actually make any changes to UNC. TS confirmed that this was correct and that in the first instance this was purely a housekeeping Modification and it has three Workgroups during which it can be assessed so the industry has adequate time to review all the changes to the Code. Assuming this Modification is implemented then the CSS text can be implemented at a later date effectively on top of it. She further mentioned that J Dixon from Ofgem has stated that it this Modification would be unlikely to need the full three months at Workgroup and TS would be happy for it to be submitted to Panel if the Workgroup was happy to do so.

TS further explained to the Workgroup that besides the structural reordering changes, this Modification also included some of the changes to the UNC which have been implemented in recent months and so required to be inserted into the newly re-ordered UNC text.

TS suggested that the Workgroup should possibly look at this offline and in their own time. KD disagreed with the suggestion and stated it would be beneficial to utilise the Workgroup to review it. PL asked whether it could be identified which were the key areas that had been changed?

RH suggested that a sensible way to proceed for this Workgroup would be to review any change in the comparison table provided by Dentons where there were notes. The Workgroup agreed with this approach.

Overall, the feedback to Dentons from reviewing the changes was that it was not always easy to identify the changes to the sections (i.e. something was moved from section 1.1.4, but the table did not mention what was added instead). Also, where a section has been deleted, that section was not added anywhere else. Hence essentially a whole section of text was now missing from the Code.

Some change marked versions of text (Section J of the TPD and Annex B) were not included in the text provided by Dentons, so the changes to these sections could not be reviewed.

A further clause (Clause 11 in Annex G1) was identified which has been struck out, but which should have been inserted and a carveout in section 7.1.6 has been deleted, without clarification.

Further to the discussions, TS told the Workgroup that she will get the clarifications sought from Dentons to feedback at the next Workgroup. She also took on board the suggestion that the table could be amended to add more columns which will show not only what pieces of text had changed but where that had eventually ended up, if other changes had acted upon that piece of text too.

**New Action 1201:** NGN (TS) to request an updated commentary table and the additional code sections required for review by Workgroup.

## 2.0 Initial Discussion

### 2.1. Issues and Questions from Panel

None raised.

### 2.2. Initial Representations

The only representation received for this Modification was from the IGT UNC Panel to consider any consequential changes to the IGT UNC.

Anne Jackson (AJ) advised that if the UNC is altered, IGT UNC will probably also need to be altered.

As a second Significant Code Review is expected (for Retail Code Consolidation RCC), thus another version of consequential drafting will need to be prepared in early 2020 for the IGT-UNC and the UNC.

The Workgroup agreed that once the changes to the UNC are finalised, the IGT administrators can review the resulting commentary table to check which of these have an impact on the IGT UNC. However, RH pointed out there will be further tasks after the first step of finalising the comparison table.

RH suggested that the DNs should separately review the changes at their forthcoming DN Forum and should ensure National Grid is enabled to participate.

Ofgem has indicated that for the final consequential drafting for the REC and Switching Programme, SPAA, UNC and IGT UNC are expected to collaborate for the implementation of the Retail Code Consolidation SCR.

<https://www.ofgem.gov.uk/publications-and-updates/retail-code-consolidation-scr-launch-statement>

#### Implementation Costs

It was acknowledged that there will be a significant administrative cost to the Joint Office as well as the CDSP (Xoserve) to implement this piece of work. RH asked if Xoserve will need to be involved in this Workgroup going forward. TS replied that she did not believe so as she has already been liaising with Dave Addison and Ellie Rogers from Xoserve and they are already aware of this Modification.

KD asked if the comparison table with the changes to the UNC, can have an additional column added to it which will include any cross code impacts, particularly to the IGTs. Penny Garner (PG) advised that this would not be possible as it was Denton's work and therefore would not be available to modify unless Denton's were agreeable to this. However, Dentons may be willing to share this with IGTs subsequent to the table being finished for the UNC and the IGT lawyers would then need to add the impact on the IGTs from the changes to the UNC code.

### 2.3. Terms of Reference

The standard UNC Workgroup Terms of Reference will apply and is available at [www.gasgovernance.co.uk/mods](http://www.gasgovernance.co.uk/mods)

### 3.0 Next Steps

RH confirmed the next steps:

- Review of amended/updated comparison table (TS)
- Review of additional code sections
- Review of consequential IGT changes

### 4.0 Any Other Business

None.

### 5.0 Diary Planning

Further details of planned meetings are available at: [www.gasgovernance.co.uk/events-calendar/month](http://www.gasgovernance.co.uk/events-calendar/month)

It was agreed that due to the nature of the changes and impact to the IGT UNC, further meetings would be held as joint IGT UNC Workgroup meetings.

Joint IGT Workgroup meetings will take place as follows:

Time / Date	Venue	Workgroup Programme
10.30 Wednesday 22 January 2020	Radcliffe House, Blenheim Court, Warwick Road, Solihull B91 2AA	Standard Workgroup Agenda plus: <ul style="list-style-type: none"> <li>• Review of amended/updated comparison table (TS)</li> <li>• Review of additional code sections</li> <li>• Review of consequential IGT changes</li> </ul>

**Action Table (as at 02 December 2019)**

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
1201	021219	1.0	NGN (TS) to request an updated commentary table and the additional code sections required for review by Workgroup.	NGN (TS)	Pending