

Representation - Draft Modification Report UNC 0684S

Amendment of the Data Permission Matrix to add Meter Asset Provider as a new User type

Responses invited by: **5pm on 14 May 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	13 th May 2019
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

We agree that MAPs should be allowed access to data items determined by the DSC Contract Committee informed by a rigorous Data Privacy Impact Assessment.

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

We agree that this satisfies the self-governance criteria.

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

Within 16 Day of Panel determination to approve the proposal.

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

None

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

Yes

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.

No

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

TPD V5 needs substantial amendment because it has become difficult to read owing to a succession of changes over the years to add parties that can receive Protected Information. Given that MAPs are included in 5.16 then we agree that they do not need to be added to TPD 5.2 as sub-clause I.

Notwithstanding this, we think that the layout of the Data Permissions Matrix (defined in GT D 5.2.1g) needs to distinguish between rights to view data items (that is rights of GTs and Shippers to see their own Protected Information) and permissions (permission granted to both Code and non-Code Parties see data that is Protected Information of another party to Code). This is a matter for the DSC Contract Committee and the CDSP.