

Joint Office
Enquiries@gasgovernance.co.uk

3 May 2019

Dear Sir or Madam,

Re: 0684S Amendment of the Data Permissions Matrix to add Meter Asset Provider (MAP) as a new User Type

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN offers qualified support for this Modification proposal.

Reasons for Support/Opposition:

We offer qualified support as this modification appears to be correcting an oversight where Meter Asset Provider (MAP) was excluded from the Data Permissions Matrix (DPM) following the implementation of UNC0649S.

MAPs data items were an existing item in Annex V-9 of UNC, prior to UNC0469S, and continued to remain so, after its implementation.

NGN believes that, following the implementation of UNC0469S, parties included in the DPM should be referenced in UNC V5 as a definition. Legal text relating to specific data permissions for these parties should be removed from UNC and only be in the DPM.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We accept that this enabling modification should further Relevant Objective f) the promotion of efficiency in the implementation and administration of the Code. However, this can only be fully achieved with the removal of the dual governance that now exists by MAPs' specific data items being in UNC and being included on the DPM.

Self-Governance Statement:

Please provide your views on the self-governance statement.

We agree that this enabling modification should follow the self-governance procedure as it seeks to make an administrative change only to the Data Permissions Matrix.

Implementation:

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

NGN would prefer for implementation to align to the further work required to Code and the DPM to remove the duplicated permissions, reducing the risk of errors being made in providing access to specific data items as a result of the dual governance.

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Any extension of timescale would not have an adverse effect on MAPs as they have existing permissions to data items under UNC V5.1.6 and the associated annex.

Impact and costs:

What analysis, development and ongoing costs would you face if this modification were implemented?
We have not identified any costs or impacts to NGN as a result of this change.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We agree that no Legal Text is required for this modification in its current form as there is no change to the UNC, only the DPM.

We agree that a Modification was still required in accordance with UNC J5.5.2 ... "For the avoidance of doubt, a Code Modification is required to add a new User type (e.g. Supplier, Price Comparison Website etc.) to the Data Permissions Matrix."

Are there any errors or omissions in the Modification Report?

None identified.

Any additional analysis or comments?

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager (Industry Codes)

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