








UNC Final Modification Report		At what stage is this document in the process?
<h1>UNC 0702S:</h1> <h2>Introducing 'Research Body' as a new user type to the Data Permissions Matrix and UNC TPD Section V5</h2>		<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p>Purpose of Modification:</p> <p>This Modification seeks to further realise the benefit of the Data Permissions Matrix reflecting the direction to greater data openness by adding 'Research Body' as a new user type to UNC TPD Section V5 and the Data Permissions Matrix.</p>		
	Panel consideration is due on 21 May 2020 <i>(at short notice by prior agreement)</i>	
	High Impact: None	
	Medium Impact: None	
	Low Impact: Transporters, Shipper Users, CDSP	

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Timetable		 0121 288 2107
Modification timetable:		Contact: Joint Office of Gas Transporters
Initial consideration by Workgroup	26 September 2019	 enquiries@gasgovernance.co.uk
Workgroup Report presented to Panel	19 March 2020	 +44 (0)799 097 2568 / +44 (0)751 799 8178
Draft Modification Report issued for consultation	19 March 2020	Proposer: Steve Mulinganie
Consultation Close-out for representations	09 April 2020	 Steve.Mulinganie@gazprom-energy.com
Final Modification Report available for Panel	15 April 2019	 +44 (0)799 097 2568 / +44 (0)751 799 8178
Modification Panel decision	21 May 2020	Transporter: Cadent
<p>An equivalent Modification for the IGT UNC has been raised (IGT134).; it would be beneficial for the two Modifications to be developed at one workgroup.</p>		 Gurvinder.Dosanjh@cadentgas.com
		 07773 151572
		Systems Provider: Xoserve
		 UKLink@xoserve.com

1 Summary

What

Making the current governance framework more efficient will support the drive towards greater openness whilst maintaining appropriate control. This Modification seeks to strike the balance by maximising the benefit of existing governance processes.

Introduction of the '**Research Body**' as a new **user** type seeks to support the direction described in the objectives of the Energy Data Taskforce of promoting innovation, operational excellence and efficiency in the UK Energy Industry where the relevant party can demonstrate that their research will benefit consumers, business, government or society.

UNC Modification 0649S *Update to UNC to formalise the Data Permissions Matrix* introduced the **Data Permissions Matrix (DPM)** to reduce the administration necessary to release data to relevant parties. Modification 0649S requires that the addition of a new user (a new party to be recognised on the DPM) is undertaken by a UNC Modification. Once the new user type has been created, the Data Services Contract, Contract Management Committee (DSC CoMC) approve the data items available to the user type.

For the avoidance of doubt, the 'Research Body' is a generic user type and unlike previous user types is not linked to a specific market participant or role. If a new user type gains access to data under the 'Research Body' there will be a limit to the time in which they are able to have access to the data. To confirm, all requests for data under the 'Research Body' will have a deadline. The CDSP expects that a [Research Summary Request] will be submitted to the DSC CoMC to gain access to data. This is expected to require details regarding the purpose of the research and what/how they are intending to achieve this. Please note, that the operational management of the Research Body process will be overseen by the DSC CoMC and not detailed within Uniform Network Code (UNC). This Modification is to add the concept of the Research Body to the UNC and to the DPM as a user type only.

Why

The Research Body is a new concept and must be defined within the Uniform Network Code.

To also add the Research Body to the Data Permissions Matrix as a new user type, in line with UNC Legal Text implemented for Modification 0649S a new Modification is required.

Making the current governance framework more efficient will support the drive towards greater openness whilst maintaining appropriate control. This Modification seeks to strike the balance by maximising the benefit of existing governance processes.

How

This Modification proposes to add the new user type of '**Research Body**' to UNC TPD Section V5 and the Data Permissions Matrix.

2 Governance

Justification for Self-Governance

It is proposed that this Modification is classified as **Self-Governance** as it does not have a material impact on gas consumers, competition, pipeline operations, security of supply, governance procedures and does not discriminate between code parties. The Modification is to enable data sharing permissions only and therefore an administrative enabler only.

An equivalent Modification for the IGT UNC has been raised (IGT134) which proposes the same governance classification.

Requested Next Steps

This Modification should:

- be considered a non-material change and therefore subject to self-governance
- be assessed by a Joint cross code UNC/IGT UNC Workgroup

3 Why Change?

UNC Modification 0649S – “*Update to UNC to formalise the Data Permission Matrix*” - was developed to formalise the Data Permission Matrix within the UNC. The Data Permission Matrix was intended to describe the Protected Information data items that each market role type is entitled to receive and to reduce the governance burden on a data service user once a use case had been established by that user.

The Energy Data Taskforce has signalled the intent that data should be ‘presumed open’ therefore this Modification proposes that the **Data Permissions Matrix** includes an additional user type of ‘**Research Body**’. A ‘**Research Body**’ would be an organisation that requires access to information **Data** for the purposes of promoting innovation, operational excellence and efficiency¹ in the UK Energy Industry that will benefit consumers, business, government and society. For the avoidance of doubt, the ‘Research Body’ is a generic user type and unlike previous user types is not linked to a specific market participant or role. Please be aware, existing user types may in addition to the data available to them as an existing user, request more data as a ‘Research Body’ for a specific purpose.

This Modification proposes that requests for access to such **Data** are subject to Industry review which will test the research proposals against these objectives and consider the relevant measures that will be required to mitigate any risk of sharing data with a relevant Research Body e.g. aggregation / anonymisation of data. The DSC CoMC will be the industry committee who oversee the operational management of the Research Body process. For the avoidance of doubt, this will be managed outside of the UNC.

¹ as described in ‘A Strategy for a Modern Digitalised Energy System - Energy Data Taskforce report’ BEIS 2019.

4 Code Specific Matters

Reference Documents

[Data Permissions Matrix](#) and supporting [Operating Guidelines DPM Conditionality](#) documents that specifies the parties, data items and delivery medium and can be found on Xoserve.com.

Knowledge/Skills

No knowledge or skills are necessary.

5 Solution

This Modification proposes to add the concept of a new User type of '**Research Body**' to UNC TPD Section V5 and the DPM.

The proposed definition for UNC TPD Section V5 is:

A '**Research Body**' is an organisation who requires access to gas industry data for an agreed objective and agreed period of time.

The agreed objectives of a Research Body's request should include (but not exclusively):

- Promoting innovation
- Operational excellence
- Efficiency in the UK Energy Industry

where the relevant party can demonstrate that their research will benefit consumers, business, government or society

The solution for the DPM element is simply adding Research Body as a new user to the Data Permissions Matrix which will be completed by the CDSP in line with the implementation of the Modification.

For the avoidance of doubt, the DSC Contract Management Committee will oversee the requests received from a Research Body and this will be managed under a framework agreed and maintained by this committee.

6 Impacts & Other Considerations

Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

Recommendations within this Modification support the objectives of 'A Strategy for a Modern Digitalised Energy System - Energy Data Taskforce report' BEIS 2019. This is not subject to a SCR.

The Ofgem Faster Switching Programme SCR is currently consulting with the Retail Energy Code Data Access Schedule which proposes a 'Data Access Matrix'. This Modification better aligns the Data Permissions Matrix to the structure anticipated by the Data Access Matrix.

Consumer Impacts

The inclusion of a User type of 'Research Body' within the Data Permissions Matrix is intended to facilitate release of data where it can be demonstrated by such users that it is to the Consumer's benefit.

Cross Code Impacts

An equivalent Modification for the IGT UNC (IGT134) has been raised which is proposed to develop at a cross code Workgroup.

EU Code Impacts

None.

Central Systems Impacts

None identified as this is aligning the UNC, IGT UNC and the Data Permissions Matrix to reflect existing arrangements.

Workgroup Impact Assessment

The Workgroup has been meeting since September 2019 and in that period, there have been 5 substantive meetings to develop the Proposal.

The Workgroup accepted that this Proposal is largely enabling in nature and in essence simply establishes a TPD Section V5 framework such that UNC parties acknowledge that certain organisations, fitting a broad category of entities collectively described as “Research Bodies”, may request data from the CDSP.

Much of the time at Workgroup was spent agreeing by what criteria a Research Body should be defined and how the definition should be drafted into the UNC. There was broad consensus, that given it would be the DSC CoMC that would actually be vetting the requests, the Proposal simply needs to establish relatively high-level principles, given that there would be a rigorous process managed by DSC CoMC to oversee the actual delivery of successful requests.

After much deliberation and debate, the view was that the UNC definition of a Research Body could be relatively broad, with the specifics of the data request being gathered using an application form, (or “template”), issued under DSC governance. Any release of data would be also be bound with conditions, placed on the data recipient, relating to how it should manage and treat any data provided to it.

The application would also cover such details as to why the applicant meets the broad definition of Research Body, for example due to its activities in relation to

- innovation
- operational excellence
- efficiency in the UK Energy Industry where the relevant party can demonstrate that their research will benefit consumers, government or society

Additionally, the applicant would need to provide further details of the purpose of the research, the data it requires, and the time it will need to retain the data. Application approval, and the management of failed applications, would be the responsibility of the DSC CoMC and would not rest with the UNCC.

7 Relevant Objectives

Impact of the Modification on the 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

Adding a new User type to UNC TPD Section V and the Data Permission Matrix will further relevant objective (f) as it can aid the promotion of innovation, operational excellence and efficiency² in the UK Energy Industry and aligns with the principles approved in UNC Modification 0649S - *Update to UNC to formalise the Data Permission Matrix*.

The two-part framework of using a broad UNC definition, and a detailed DSC procedure for dealing with individual requests for data by third parties, should provide a more steam-lined & efficient method of managing the approval process, than is presently the case.

² as described in 'A Strategy for a Modern Digitalised Energy System - Energy Data Taskforce report' BEIS 2019.

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.

Given that the release of data to a Research Body would relate to both UNC and IGT UNC governed networks, implementation of this proposal and corresponding IGT UNC Proposal 134 should be aligned.

A template for Research Body to submit request, and a framework processing requests, is in the process of being finalised and approved by DSC CoMC and should be operational by the time Codes governance is complete.

9 Legal Text

Legal Text has been provided by Cadent and is included below.

The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

Text Commentary

MODIFICATION 0702S - LEGAL TEXT - EXPLANATORY TABLE

INTRODUCING “RESEARCH BODY” AS A NEW USER TYPE TO THE DATA PERMISSIONS MATRIX AND UNC TPD V5

Notes

1. This table is based on the legal text for Modification 0702S published on the Joint Office website on 28 February 2020.
2. Modification 0702S relates to sharing Protected Information with Research bodies.

TPD Section V (General)	Topic	BRDs	Explanation
New paragraph 5.5.3 (n)	Information and Confidentiality – Exceptions to restrictions on disclosing Protected Information		The addition of paragraph 5.3.3(n) introduces the definition of “Research Body” to the UNC and the Data Permissions Matrix and allows for Protected Information to be shared with a Research Body for an agreed period of time and for an Agreed Objective.

Text

TRANSPORTATION PRINCIPAL DOCUMENT
SECTION V – GENERAL

Insert new paragraph 5.5.3(n)

5.5.3

- (n) to the disclosure of Protected Information in accordance with the Data Permissions Matrix, as amended in accordance with paragraph 5.5.2 (j) to authorise Research Bodies as a new User type. For the purpose of this paragraph and the Data Permissions Matrix, a “**Research Body**” is an organisation which requires access to gas industry data for an Agreed Objective and an agreed period of time. An “**Agreed Objective**” may include (but is not limited to) the following, but only where the Research Body can demonstrate to the DSC Contract Management Committee that their research will benefit consumers, government or society: promoting innovation; developing/delivering operational excellence; and/or developing/delivering efficiency in the UK energy industry.

10 Consultation

Panel invited representations from interested parties on 19 March 2020. The summaries in the following table are provided for reference on a reasonable endeavours’ basis only. It is recommended that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Implementation was unanimously supported in the 2 representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
Northern Gas Networks	Support	f) – positive	<ul style="list-style-type: none"> • Supports this Modification as they believe the introduction of ‘Research Body’ into the Data Permissions Matrix (DPM) and Uniform Network Code (UNC) Transportation Principal Document (TPD) Section V should allow qualifying organisations to be granted access to the data they require for research purposes, which will promote innovation, operational excellence and/or efficiency in the UK energy industry. • Agrees that the Modification qualifies as Self-Governance as it only seeks to introduce ‘Research Body’ as an User Type in the DPM and UNC TPD Section V and proposes no changes to party obligations, systems or processes. • Agrees that implementation of the Modification can take place 16 days after Modification Panel decision.

			<ul style="list-style-type: none"> • No impacts or costs have been identified. • Are satisfied that the Legal Text provided meets the intent of the solution.
npower	Support	f) – positive	<ul style="list-style-type: none"> • Agrees that adding “Research Body” as a new user type under the Data Permissions Matrix will be helpful in promoting innovation in the energy industry and will deliver greater efficiency in the administration of the Code. • Agrees that the application of self-governance procedures is appropriate. • Is supportive of the proposed implementation date. • Indicates that there will be no additional costs. • Satisfied that the Legal Text will deliver the intent of the solution.

Please note that late submitted representations will not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

11 Panel Discussions

12 Recommendations

Panel Determination

Members agreed:

- that Modification 0702S should **[not]** be implemented.

13 Appendix 1 – Research Body Framework V1.0 Approved

Research Body Request Framework

Framework Purpose

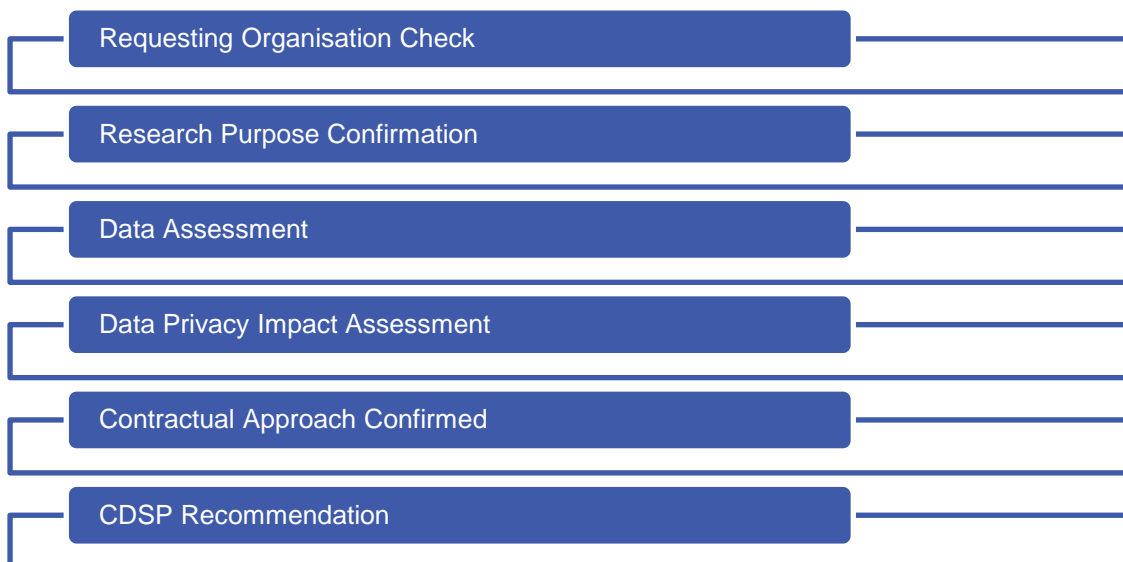
Uniform Network Code (UNC), TPD, Section V5 states:

a “Research Body” is an organisation which requires access to gas industry data for an Agreed Objective and an agreed period of time. An “Agreed Objective” may include (but is not limited to) the following, but only where the Research Body can demonstrate to the DSC Contract Management Committee that their research will benefit consumers, government or society: promoting innovation; developing/delivering operational excellence; and/or developing/delivering efficiency in the UK energy industry.

The purpose of this framework is to set out the steps the CDSP will follow when a Research Body is looking to gain access to gas industry data (“Acceptance Criteria”).

The Data Services Contract (DSC) Contract Management Committee (CoMC) will be responsible for approving and maintaining the Research Body Request Framework (“Framework”). The Framework will be utilised by the Central Data Service Provider (CDSP) to check against when assessing a Research Body request. For the avoidance of doubt, the CoMC will get visibility of every Research Body Request received by the CDSP and will be expected to approve the CDSP recommendation.

The proposed checks are summarised below:



Process for amending this Framework

Any amendments to this Framework must be approved at CoMC.

Any DSC Party or the CDSP may propose an amendment to this Framework by following the process set out below:

- 1) If the amendment is proposed by a DSC Party, details of the proposed amendments can be shared with CDSP with sufficient time to enable CDSP to share with all CoMC Representatives a minimum of 5 business days prior to the CoMC where approval will be sought.
- 2) If CDSP propose the amendments, CDSP will share the amendments with CoMC a minimum of 5 business days prior to the CoMC where approval will be sought.
- 3) Proposed amendments to be added to the agenda for the CoMC where approval will be sought.
- 4) CoMC Representatives and CDSP to review the amendments.
- 5) Any comments relating to the amendments to be discussed at CoMC.
- 6) Approval of any amendments to be given at CoMC.
- 7) Once approved CDSP will:
 - update the Framework with the approved amendments;
 - update the version control on the final page of this Framework; and
 - arrange for the updated Framework to be published

The Framework should be officially reviewed by the CoMC on an annual basis. This review should assess the suitability of the Framework considering the previous 12 months.

Requesting Organisation Check

Intended to confirm and [assess] the organisation requesting access to data as a Research Body

Organisation Name Confirmed

Organisation Company Number / Unique Reference Number

Acceptance
Criteria

- Confirmed organisation and confident in identifying them from a legal perspective

Research Purpose Confirmed

Intended to clarify the purpose of research and how the data can support the purpose being achieved

Intention of Research and how it will be achieved confirmed

Check against “Agreed Objectives”

An “Agreed Objective” may include (but is not limited to) the following, but only where the Research Body can demonstrate to the DSC Contract Management Committee that their research will benefit consumers, government or society: promoting innovation; developing/delivering operational excellence; and/or developing/delivering efficiency in the UK energy industry.

- Understand the purpose of the research / what the data provided will be used for and under what agreed objective the request is being made. *Where the agreed objective is outside of those listed in the definition, this will be made clear to CoMC*

Data Assessment

Intended to assess the data the Research Body requires access to and confirm if the CDSP are the correct source of the required data

Data Items and Justification per Data Item

Dataset Sample Size (if known)

Dataset Parameters (criteria)

Method of access to Dataset

Period of Research

Dataset Processing Approach

How are you intending to use this dataset to achieve your research purpose?

For example, is the data being merged with another dataset? Is the intention to publish the dataset?

Anonymisation Approach Agreed

- Confirmation on dataset required

Data Privacy Impact Assessment (DPIA)

Where the disclosure of information includes the processing of personal data a Data Privacy Impact Assessment (DPIA) is required to identify and mitigate risks.

Xoserve will apply the below tests to each Research Body request and if the answer is 'yes' to any of the questions, a DPIA is required.

- a) Will the project involve the collection of new information about individuals?

- b) Will the project compel individuals to provide information about themselves?
- c) Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
- d) Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
- e) Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.
- f) Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?
- g) Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.
- h) Will the project require you to contact individuals in ways that they may find intrusive?
- i) Will the disclosure of information utilise new technology for Xoserve?
- j) Will the disclosure include information that identifies a vulnerable customer?
- k) Will the disclosure release mass data to a party?
- l) Will the disclosure include information that identifies an occurrence of theft of gas.
- m) Will the disclosure require a fundamental change to Xoserve business

The CDSP will assess whether a full DPIA is required for every Research Body request for data.



DPIA completed with risk mitigations agreed and outcome shared with CoMC

Contractual Approach Confirmed

Intended to confirm the contractual arrangements and funding for a Research Body request.

CDSP expects each Research Body who is approved to access data will be required to sign an agreement in accordance with the CDSP Service Document – Third Party and Additional Services Policy

The CDSP will assume that every Research Body request is a service that is chargeable to the requestor unless otherwise instructed by the CoMC.

Acceptance
Criteria

- Contractual approach and funding agreed

Recommendation

CDSP recommendation based on the Research Body request being assessed against the agreed Framework

Acceptance
Criteria

With regards to this request, the CDSP recommend that CoMC:

Approve*

Reject*

CoMC approval

CoMC are made aware of the Research Body request and the CDSPs recommendation based on the agreed Framework and are asked to approve.

Additional information

* The CDSP must provide additional information to justify the Research Body request recommendation.

The CDSP may also use this section to provide further information which may be required for CoMC to decide and which has otherwise not been specified within the Framework. This can include confirmation regarding whether the requesting organisation has previously submitted a Research Body Request.

Version Control

Version	Date:	Author	Status
1.0	18/03/2020	Ellie Rogers	Approved