UNC Final Modification Report

At what stage is this document in the process?

UNC 0684S:

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

01

Modification



Workgroup Report



Draft Modification



Purpose of Modification:

This Modification seeks to amend the Data Permissions Matrix to add Meter Asset Provider (MAP) as a new User type.



Panel consideration is due on 16 May 2019 (at short notice by prior agreement)



High Impact:

None



Medium Impact:

None



Low Impact:

Transporters, Shipper Users, CDSP

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Timetable

Modification timetable:

11 Panel Discussions

| Initial consideration by Workgroup | 28 March 2019 |
|---|---------------|
| Workgroup Report presented to Panel | 18 April 2019 |
| Draft Modification Report issued for consultation | 18 April 2019 |
| Consultation Close-out for representations | 14 May 2019 |
| Final Modification Report available for Panel | 15 May 2019 |
| Modification Panel decision | 16 May 2019 |

An equivalent Modification, IGT UNC Modification 122 has been raised and it would be beneficial for the two Modifications to be developed at one Workgroup.



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1 Summary

What

Meter Asset Providers (MAP) are already privy to data under UNC but are not currently specified as a User Type within the Data Permissions Matrix (DPM).

Modification 0649S - Update to UNC to formalise the Data Permission Matrix¹, has formally created the Data Permission Matrix as part of the UK Link Manual. Modification 0649S requires that the addition of a new User type (a new party to be recognised on the Data Permission Matrix) is undertaken by a UNC Modification. Once the new User type is created, the approval for the release of data to the new User type is held by the Data Services Contract, Contract Management Committee (DSC CoMC).

Why

In line with UNC Legal Text implemented for 0649S a new Modification is needed to add a new User type to the DPM, regardless of if they are already specified under UNC Section V.

MAPs are needed to be added to the DPM due to a requirement that was placed on the Central Data Service Provider (CDSP) as part of Ofgem's Central Switching Service Consequential Change to pass Meter Asset Provider Identifier (MAP Id) to CSS in order for the MAPs to be notified at a Supplier registration and switching event. Population of MAP Id into UK Link system is required for CSS testing. Data cleansing will be required to aid MAPs in providing accurate data to the CDSP. Adding MAPs to the DPM will facilitate release of data over and above what is currently detailed in Section V5 (subject to DSC Contract Managers Committee (CoMC) approval).

How

This enabling Modification is proposing to add Meter Asset Providers (MAP) as a new User type to the DPM.

2 Governance

Justification for Self-Governance

The Modification Panel determined 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.

As there is an IGT UNC Modification (tbc) it is recommended they both follow the same governance classification.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to self-governance
- proceed to Consultation

¹ http://www.gasgovernance.co.uk/0649

3 Why Change?

This change is required to add MAP as a new User type to the DPM in line with code set out in Modification 0649S. This will then enable a request for the disclosure of specific data to be submitted to the DSC Contract Management Committee for approval, where needed, to support the data cleansing and verification in order to populate the accurate MAP Id in UK Link systems for onward transmission to CSS.

Also, as part of the Joint MIS Development Group (JMDG), Use case 58 was recommended for progression to provide MAP access to CDSP system data to assist with validating asset and Supplier information to aid in cleansing data for assuring operational processes.

4 Code Specific Matters

Reference Documents

MAPs are specified in UNC under Section V 5.16 (Annex V-9) and are already allowed to receive data from the Central Data Service Provider (CDSP) as per the rules set out in Section 5.16.

5 Solution

This enabling Modification is proposing to add the MAP as a new User type to the DPM.

6 Impacts & Other Considerations

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

No impact.

Consumer Impacts

None directly identified, this is a permissions Modification to permit the release of data that may lead to benefits to the consumer. However, this is subject to confirmation by the PIA.

| Consumer Impact Assessment (Workgroup assessment of proposer initial view or subsequent information) | | |
|--|--|--|
| Criteria | Extent of Impact | |
| Which Consumer groups are affected? | Domestic Consumers Small non-domestic Consumers Large non-domestic Consumers Very Large Consumers | |
| What costs or benefits will pass through to them? | | |
| When will these costs/benefits impact upon consumers? | | |
| Are there any other Consumer Impacts? | | |

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Cross Code Impacts

An IGT equivalent Modification has been raised; IGT122 - Amendment of the Data Permission Matrix to add Meter Asset Provider as a new User type.

EU Code Impacts

None.

Central Systems Impacts

As this is a permissions Modification there are no direct impacts, however, impacts will be identified and developed through the DSC Contract Management Committee and the DSC Change Management Committee, where required, to deliver the data requested.

Rough Order of Magnitude (ROM) Assessment

Not applicable.

7 Relevant Objectives

| lm | Impact of the Modification on the Relevant Objectives: | | | | |
|----|--|-------------------|--|--|--|
| Re | elevant Objective | Identified impact | | | |
| a) | Efficient and economic operation of the pipe-line system. | None | | | |
| b) | Coordinated, efficient and economic operation of | None | | | |
| | (i) the combined pipe-line system, and/ or | | | | |
| | (ii) the pipe-line system of one or more other relevant gas transporters. | | | | |
| c) | Efficient discharge of the licensee's obligations. | None | | | |
| d) | Securing of effective competition: | None | | | |
| | (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. | | | | |
| 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 | | | |

This change is to add Meter Asset Provider (MAP) to the Data Permissions Matrix. This Modification is less onerous than creating bespoke permissions for Meter Asset Provider (MAP) within the main body of UNC to

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facilitate data access as part of consequential changes from CSS. This Modification also aligns with the principles approved in UNC Modification 0649S - Update to UNC to formalise the Data Permission Matrix.

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 should also be aligned with the IGT UNC.

9 Legal Text

Text Commentary

Not applicable.

Text

The change to the Data Permission Matrix (DPM) has been published alongside this Modification.

10 Consultation

Panel invited representations from interested parties on 18 April 2019. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Of the 5 representations received 3 supported implementation and 2 offered qualified support.

| Representations were received from the following parties: | | | |
|---|----------------------|------------------------|--|
| Organisation | Response | Relevant Objectives | Key Points |
| Cadent | Support | f - positive | Supports this Modification adding Meter Asset Providers (MAPs) as a new User type to the Data Permissions Matrix. The inclusion of MAPs as a User type will facilitate the submission of Central Switching Systems notices. Agrees with the Self-Governance Statement and standard implementation timescale. |
| Northern Gas Networks | Qualified Support | f - positive | Believes that, following the implementation of Modification 0649S - Update to UNC to formalise the Data Permissions Matrix (DPM), 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. Believes that full realisation of Relevant Objective f) 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 removed and included in the DPM. • Agrees with the Self-Governance Statement with a preference that implementation should align to the further work required to Code and the DPM to remove the duplicated permissions. |
|---------------------------|----------------------|--------------|---|
| npower | Support | f - positive | Supports the Modification as this will improve the accuracy of industry data. Agrees with the Self-Governance Statement and the implementation timescales outlined in the Modification. |
| SGN | Qualified Support | f - positive | Notes that Meter Asset Providers currently access data under UNC, however they are not currently specified as a 'User Type' within the 'Data Permissions Matrix' (DPM). The current situation emerged from the implementation of UNC Modification 649S whereby MAPs were excluded from the DPM. Notes this Modification sets out to correct this, and for that reason, offers qualified support. Highlights that if this Modification is implemented, a 'dual-governance' situation would exist with data items specific to MAP's being included in both the DPM and in UNC. Suggests governance is streamlined, and this should be a key matter for the DSC Contract Management Committee. Agrees with the Self-Governance Statement and the standard implementation timescale. |
| Wales & West Utilities | Support | f - positive | Agree that MAPs should be allowed access to data items determined by the DSC Contract Committee informed by a rigorous Data Privacy Impact Assessment. Agrees with the Self-Governance Statement and the standard implementation timescale. Suggests that TPD V5 needs substantial amendment because it has become difficult to read owing to a succession of changes 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. Feels 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). |

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

Discussion

Panel Members noted that Modification 0684S seeks to amend the Data Permissions Matrix to add Meter Asset Provider (MAP) as a new User type.

Panel Members considered the representations made noting that, of the 5 representations received, 3 supported implementation and 2 offered qualified support.

Xoserve offered clarification that a proposed new Modification examining changes needed to TPD V5 is envisaged to come to Panel in July 2019 which will address some of the concerns raised in the consultation representations.

Panel Members considered whether this Modification 0684S should be implemented whilst noting the proposed new Modification is expected to follow. Panel Members noted that delaying this Modification 0684S would have no significant benefit and may have a detrimental effect on the data cleanse required ahead of introduction of the items into UK Link.

Panel Members considered the dual governance issue raised by SGN in their consultation response. This Modification 0684S seeks to add the MAP to the list of User Types only and will not at this stage give them access to data items. Panel Members noted that the dual governance issue is expected to be managed adequately by the DSC Contract Management Committee for the period it is likely to exist, pending the potential implementation of the aforementioned new Modification. Panel Members considered how long the period was likely to be and estimated it would be around 2 months until the potential new Modification is raised.

Xoserve clarified that the 'clean up' of TPD V5 will be in the forthcoming potential new Modification.

Consideration of the Relevant Objectives

Panel Members considered whether the Modification furthers relevant objective f)

f) Promotion of efficiency in the implementation and administration of the Code.

Panel Members considered this was a facilitating Modification only and agreed with Workgroup and respondents that this relevant objective is likely to be furthered by the Modification 0684S because addition of a new User type (a new party to be recognised on the Data Permission Matrix) is required to be undertaken by a UNC Modification.

Determinations

Panel Members voted by majority that there were no new issues identified during consultation (12 votes out of 13).

Panel Members voted unanimously to recommend implementation of Modification 0684S.

12 Recommendations

Panel Determination

Members agreed that Modification 0684S should be implemented.

