

UNC Draft Modification Report		At what stage is this document in the process?
<h1>UNC 0649S:</h1> <h2>Update to UNC to formalise the Data Permissions Matrix</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 01 Modification </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>This Modification seeks to formalise the Data Permissions Matrix within the Uniform Network Code (UNC) and set out the process for amending the data access permissions in the future.</p>		
	<p>This Draft Modification Report is issued for consultation responses at the request of the Panel. All parties are invited to consider whether they wish to submit views regarding this self-governance modification.</p> <p>The close-out date for responses is 11 October 2018, which should be sent to enquiries@gasgovernance.co.uk. A response template, which you may wish to use, is at: http://www.gasgovernance.co.uk/0649</p> <p>The Panel will consider the responses and agree whether or not this self-governance modification should be made.</p>	
	<p>High Impact:</p> <p>None</p>	
	<p>Medium Impact:</p> <p>None</p>	
	<p>Low Impact:</p> <p>CDSP, Shippers and Transporters</p>	

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Timetable			Transporter: Cadent
Modification timetable:			 chris.warner@cadentgas.com
Initial consideration by Workgroup	25 January 2018		
Amended Modification considered by Workgroup	23 August 2018		
Workgroup Report presented to Panel	20 September 2018		 01926 653541
Draft Modification Report issued for consultation	20 September 2018		Systems Provider: Xoserve
Consultation Close-out for representations	11 October 2018		
Final Modification Report available for Panel	12 October 2018		 UKLink@xoserve.com
Modification Panel decision	18 October 2018		m

1 Summary

What

Currently the data that can be accessed within the Data Enquiry Service (DES) by User and User access type is illustrated within the DES Permissions Matrix which forms part of the UK Link Manual. This Modification seeks to formalise the matrix within the Uniform Network Code (UNC) and extend it to include other request / respond services and to set out the process to amend the data field and/or the data access permissions where required.

Why

The DES Permissions Matrix details the User groups who can access DES and the data fields they have permission to view. This was incorporated into the UK Link Manual following the UK Link Manual review. This was approved by the Data Services Contract (DSC) Change Management Committee and is available for Users to view within the UK Link SharePoint site.

This Modification has been raised to formalise the Data Enquiry Service arrangements and extend them to include other request / respond services where data is provided such as the Application Programmable Interfaces (APIs) and the telephone service. This Modification seeks to reference the Data Permissions Matrix (which will incorporate the existing DES Permissions Matrix) within UNC TPD Section V. This modification also details how this Data Permissions Matrix can be updated to add or amend the data field and/or permissions users can access within the data services within the scope of the Data Permissions Matrix.

How

This Modification seeks to formalise the Data Permissions Matrix within the UNC.

The solution is an update to UNC TPD Section V5.5 (Exceptions), to permit the release of data in line with the Data Permissions Matrix. It is proposed that the DSC Contract Management Committee as described within GT D – CDSP and UK Link – is utilised to approve proposals brought by the CDSP to amend the data fields and/or permissions against each service.

2 Governance

Justification for Self-Governance

Panel determined the Modification is unlikely to have a material effect on the promotion of efficiency in the implementation and administration of the Code or the securing of effective competition, as merely seeks to formalise the DES Permissions Matrix within the UNC and stipulate the process for amending the data fields and/or permissions going forward. It proposes to extend the services included within this to describe other services where data is made available to Users. This will in effect create a multi service Data Permissions Matrix.

This requires an addition to the text in UNC TPD Section V5.5 to permit the release of data in line with the Data Permissions Matrix which is part of the UK Link Manual. Assessment of changes with respect to the role of the Contract Management Committee may lead to consequential changes in General Terms D – CDSP and UK Link.

As a result, it is unlikely to have a material impact

There is no impact on any of the other Self-Governance criteria.

As such, this is a non-material change to the UNC to formalise the existing DES Permissions Matrix and incorporate additional services into the Data Permissions Matrix.

Modification 0649S will therefore follow self-governance procedures.

Requested Next Steps

This Modification should:

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

The Workgroup agree with the Panels view on self-governance for the reasons above and consider this Modification is sufficiently developed to proceed to consultation.

3 Why Change?

Modification 0613S – *Revised UK Link Manual CDSP Data Services Document* was implemented on 13 October 2017. This Modification created the UK Link Manual as part of the DSC. Following approval at the DSC Change Management Committee (ChMC) meeting in January 2018, the DES Permissions Matrix was incorporated into the UK Link Manual and can be viewed through the UK Link SharePoint site.

The DES Permissions Matrix details the parties who can access DES and the data fields they have permission to see by User view type.

Since the creation of the DES Permissions Matrix within the UK Link Manual the API capability has been developed which enables users of the service to request specific agreed data items via this service. The data items within this service are also considered as Protected Data where provided outside of a portfolio view therefore would be subject to a UNC Modification to amend UNC TPD Section V5.5 to identify this as an Exclusion. This process has been necessary for UNC Modifications 0593 and 0640S to release data to Price Comparison Websites and Third Party Intermediaries, and to Suppliers respectively. A number of use cases have been identified within the Joint Market Information Service (MIS) Development Group (JMDG) as near term API services that users have identified as required which would be expected to materialise as UNC Modifications were this modification to be not implemented.]

By expanding the services that are included within this Data Permissions Matrix then greater flexibility and responsiveness could be achieved for services that would be expected to be quicker to market for data provision services to users and therefore realise benefits sooner.

It is also proposed that the data items included within the telephone services offered are also included within the Data Permissions Matrix for this same reason.

Through the formalisation of the Data Permissions Matrix within the UNC, it will permit the release of data in line with the matrix. This Modification proposes that the DSC Contract Management Committee approve amendments to the Data Permissions Matrix such as adding new data items to the matrix, and defining which services and parties that these items are available to. This Modification will improve the efficiency of data governance by reducing the need for UNC Modifications, but it is expected that the DSC Contract Managers may still consider that a UNC Modification is relevant.

For the avoidance of doubt, any new User type not currently referenced within the Data Permissions Matrix as a current User type e.g. Supplier, Price Comparison Website etc. will require a UNC Modification to add the new User. This will be the case on all occasions where a new User type seeks access.

4 Code Specific Matters

Reference Documents

UK Link Change Pack – communication 1816.1 – IM – SN – Data Enquiry Service Permissions Matrix

Knowledge/Skills

No knowledge or skills are necessary.

5 Solution

This amendment would formalise the arrangement to permit the CDSP to release data in line with the Data Permissions Matrix.

UNC TPD Section V5.5 (Exceptions) is to be amended to formalise the Data Permissions Matrix and a new clause be included within V 5.5.2 to allow the CDSP to release data to parties in line with the Data Permissions Matrix.

Amendment to GT-D is proposed to include the Data Permissions Matrix as a component part of the UK Link Manual.

Since it is proposed that the DSC Contract Management Committee provide approval for release of data items to the relevant party, the DSC Change Management Procedures should reference an instruction from Contract Managers to update the Data Permissions Matrix.

In exceptional cases, the DSC Contract Management Committee may still wish to utilise the Modification process in order to ensure visibility of changes to industry participants.

For the avoidance of doubt, any new User type not currently referenced within the Data Permissions Matrix as a current User type e.g. Supplier, Price Comparison Website etc. will require a UNC Modification to add the new User. This will be the case on all occasions where a new User type seeks access.

6 Impacts & Other Considerations

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

No impacts identified.

Consumer Impacts

Consumer Impact Assessment	
Criteria	Extent of Impact
Which Consumer groups are affected?	<ul style="list-style-type: none"> No direct impacts.
What costs or benefits will pass through to them?	As this Modification is providing permissions for the release of data under specific scenarios. No additional costs should pass through to consumers should this Modification be implemented.
When will these costs/benefits impact upon consumers?	Not applicable.
Are there any other Consumer Impacts?	No direct consumer impacts have been identified. However, the release of data might be considered to benefit consumers where this for example supports faster or more reliable switching.

Cross Code Impacts

This Modification would directly impact IGT UNC and a joint Workgroup was been established which included the assessment of IGT115 - Update to IGT UNC to formalise the Data Permissions Matrix.

EU Code Impacts

None identified.

Central Systems Impacts

As this Modification is providing permission for the release of data, there would be no central systems impacts should this Modification be implemented and therefore no associated systems costs.

Workgroup Impact Assessment

The Workgroup notes that this Modification establishes a process for managing the permissions required to release data subject to oversight by the relevant DSC Committees.

This should allow for a more responsive decision-making process for the management of permissions to release data and remove the need to raise future permissions based UNC Modifications, unless there is a material need to do so.

Some participants noted that while this Modification establishes a general principle for permission to release data in UNC TPD Section V, this might cause conflicts with current clauses in Section V which identifies the release of specific data items in specific circumstances and careful review of the Legal Text should ensure potential conflicts are removed.

The Workgroup notes that should this Modification be implemented, it is likely to lead to the withdrawal of UNC Modification 0663S - Extending the data comprised under the definition of Supply Point Premises Data (TPD V5.18.1) as it would be superfluous.

The Workgroup noted that the Legal Text provided references instruction to the CDSP to change the Data Matrix by instruction from Contract Managers. However, it is suggested that the term DSC Contract Management Committee is used as this would be consistent and would prevent possible confusion that a DSC Contract Manager could instruct a change in isolation.

Rough Order of Magnitude (ROM) Assessment

Not required.

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

This Modification Proposal should have a positive impact on relevant objective f) Promotion of efficiency in the implementation and administration of the Code, as it formalises the permissions for the release of data and sets out the process in which these can be amended. In addition, it would reduce the need to raise UNC Modifications to provide permission to release data where this would be of a non-material nature, making the process more responsive and efficient.

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.

The Workgroup notes that changes to IGT UNC are managed through releases and should this Modification and IGT Modification 115 be approved for implementation, it would be beneficial if the implementation dates were aligned, which might require a special release for IGT Modification 115.

9 Legal Text

Legal Text has been provided by Cadent and is published alongside this report. The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution subject to consideration of:

1. That the proposed changes to UNC TPD Section V do not cause conflicts or extend the existing permissions or exemptions set out in Section V.
2. Reference to Contract Managers is replaced with DSC Contract Management Committee.

10 Recommendations

Panel's Recommendation to Interested Parties

The Panel have recommended that this report is issued to consultation and all parties should consider whether they wish to submit views regarding this self-governance modification.