

UNC Final Modification Report		At what stage is this document in the process?
<h1>UNC 0697VS:</h1> <h2>Alignment of the UNC TPD Section V5 and 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;"> <span style="border: 1px solid #ccc; border-radius: 5px; padding: 2px 5px;">01</span> Modification         </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 5px; padding: 2px 5px;">02</span> Workgroup Report         </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 5px; padding: 2px 5px;">03</span> Draft Modification Report         </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 5px; padding: 2px 5px;">04</span> Final Modification Report         </div> </div>
<p><b>Purpose of Modification:</b></p> <p>This Modification seeks to rationalise UNC TPD Section V5 and remove inconsistency with the Data Permissions Matrix.</p>		
	The Panel determined that this Self-Governance Modification be implemented	
	High Impact: None	
	Medium Impact: None	
	Low Impact: Transporters, Shipper Users, CDSP	

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<b>Timetable</b>			
<b>Modification timetable:</b>			<a href="mailto:Gurvinder.dosanjh@cadentgas.com">Gurvinder.dosanjh@cadentgas.com</a>
Initial consideration by Workgroup	26 September 2019		
Workgroup Report presented to Panel	20 August 2020		0773 151572
Draft Modification Report issued for consultation	20 August 2020		Systems Provider: Xoserve
Consultation Close-out for representations	11 September 2020		
Final Modification Report available for Panel ( <i>at short notice</i> )	14 September 2020		<a href="mailto:UKLink@xoserve.com">UKLink@xoserve.com</a>
Modification Panel decision	17 September 2020		
An equivalent Modification has been raised for the IGT UNC (IGT135), it would be beneficial for the two Modifications to be developed at one workgroup.			

## 1 Summary

### What

UNC Modification 0649S introduced the **Data Permissions Matrix (DPM)** to reduce the administration necessary to release data to relevant parties (this term is intended to indicate either market participant roles (e.g. MAM / MAP) or where the release of data is intended to specific organisations). When this Modification was implemented the fundamental review of the existing Protected Information aspects of the UNC was not conducted therefore this part of the UNC is inconsistent. To ensure consistency across UNC and the DPM, including removing the detail from the UNC which describes users and the data items that parties can access. In parallel, the DPM will be updated to remove the services (mechanism) around how the data is shared to each market participant type (**user**). This will eliminate the need for DSC Contract Management Committee (CoMC) to approve release of a data item via other services unless they chose to apply different criteria to different services. With this approach, an existing user who already has access to data will not require additional consent to receive the same data in a different format via an alternative mechanism, unless the DSC CoMC determine that it is necessary to do so.

### Why

Making this change will remove ambiguity and any inconsistency between the UNC and the DPM. The DPM will clearly detail the parties able to access data, and those data items each party can have access to.

This will prevent misalignment between the UNC and the DPM whilst making it explicit who can have access to data.

### How

This Modification proposes to ensure consistency across UNC and the DPM

It seeks to remove from UNC reference to the users and actual data items users have access to. These users and the data items they have access to will be detailed within the DPM. Where certain conditions are explicitly stated for a user to gain access to data, these will be removed from the UNC, assessed, and where necessary retained within the DPM supporting documentation which forms part of the DPM (formally known as the Operating Guidelines Document – Data Permission Matrix Conditionality). This document is intended to provide a summary of all users within the DPM and provide conditionality details agreed by DSC Contract Managers within the DSC CoMC. This document will form part of the DPM.

It also proposes to add the parties to the DPM which are currently referenced in UNC TPD Section V5 – Protected Information who are not currently detailed within the DPM as a user type.

Please note, parties who do not require DSC CoMC permissions to gain access to data, will not be added as a user within the DPM. Access for these parties will be considered on a case by case basis. Examples that could fall under this category of user could include but not limited to Ofgem, HSE.

For the avoidance of doubt, this Modification does not intend to control or change any National Grid NTS data which is set out within UNC TPD Section V5. To confirm, National Grid NTS data is out of scope of this Modification.

Please note, if there is a UNC code clause which allows a user access to data which is not currently detailed within the DPM, the UNC code clause will supersede the DPM. Every effort will be made to avoid this situation and ensure that users who have gained consent to access data and are detailed within the UNC are also covered under the DPM.

The equivalent changes to the DPM will be made to remove the services (mechanism) around how the data is shared to each user type. This will eliminate the need for the CoMC to approve release of a given data item under another service, unless the CoMC chooses to do so. With this logic, an existing user who already has access to data will not require additional CoMC approval to receive the same data in a different format via an alternative mechanism. The DPM will still have a Portfolio and Community view for each user type<sup>1</sup> and detail the data they are able to access.

## 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 consistently specify the parties entitled to receive Protected Information.

Equivalent changes are necessary to the IGT UNC, so it is recommended that the IGT UNC Modification, IGT135 follows the same governance classification.

### Requested Next Steps

This modification should:

- be considered a non-material change and 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<sup>2</sup>, was developed to formalise the DPM within the UNC. The DPM 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.

Modification 0649S did not fully review existing UNC TPD Section V5 to apply consistency of detail with respect to the parties with access to data, and to remove references within the UNC which are now adequately described in the DPM.

Several entities specified in UNC TPD Section V5 'Information and Confidentiality' are not all currently referenced in the DPM because the DPM was originally created to only describe of data via a specific service. This Modification is looking to reference these within the DPM to ensure both are aligned. These parties being proposed to be added to the DPM are:

- Energy Theft Tip-Off Service (ETTOS)
- Theft Risk Assessment Service (TRAS)

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<sup>1</sup> Where registration details or appointment of a user type is recorded in UK Link systems.

<sup>2</sup> [UNC Modification 0649S: Update to UNC to formalise the Data Permission Matrix](#) and [associated legal text](#)

- The holder of the smart meter communications licence
- The parties given the power of investigation and consumer issue resolution

It also proposes to remove Authorised Agency Users from the DPM. Authorised Agency Users were historically users such as the police and HSE, however their access to the Data Enquiry Service (DES) was revoked. As detailed in the 'How' section, these parties do not require CoMC approval to gain access and therefore are managed outside of the DPM and should be removed as a user.

Major Energy Users are currently detailed within the DPM. We are proposing this user is renamed to Industrial and Commercial Consumer within the DPM.

This Modification also looks to rationalise UNC TPD Section V5 so that the users who have access to data and the data available to them is specified in the DPM, rather than the UNC itself.

The DPM currently specifies the service where the data is available to a user. This level of detail means that the provision of a data item that a user can access by a new medium requires approval by the DSC CoMC. It is proposed to remove the services (mechanism) around how the data is shared to each user type. This will eliminate the need for the CoMC to approve release of a given data item under another service, unless the CoMC chooses to do so. Whilst this does not in itself require a Modification to amend, it is proposed to do so concurrently with the development of this Modification to ensure visibility and should consequential impacts to the UNC be identified these can be incorporated accordingly.

## 4 Code Specific Matters

### Reference Documents

[Data Permissions Matrix \(v10.0\)](#) and supporting the [Operating Guidelines DPM Conditionality \(v6.0\)](#)

document, that specifies the parties, data items and delivery medium, can be found on [Xoserve.com](https://www.xoserve.com)

Please note, both the DPM and the supporting conditionality document will be updated following the implementation of this Modification and the IGT equivalent.

### Knowledge/Skills

Not identified.

## 5 Solution

Clause 5.5.2(j) within Section V should be amended to remove the sentence regarding the Data Permissions Matrix taking precedent if there is an inconsistency with V55. It also proposes removing the example User types as it is not believed they provide any benefit, plus could cause potential confusion:

(j) to the disclosure of Protected Information by the CDSP in accordance with the provisions of the Data Permissions Matrix, (as defined in General Terms D5.2.1(g)). ~~In the event of an inconsistency between the provisions of paragraphs 5.5, 5.11 or 5.15 – 5.18 of this Section V and the Data Permissions Matrix, the Data Permissions Matrix will take precedent.~~ 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

For the avoidance of doubt, this Modification intends to keep the current logic in place for adding a new user to the DPM, therefore a Code Modification will still be required for this activity despite the proposal not to specifically reference users added to the DPM in the UNC itself.

Section GT D5.2.1(g) is where the Data Permissions Matrix is defined in UNC and this clause is proposed to be updated as part of this Modification. This is to remove the reference to the services by which a user can access data as this is being removed from the DPM:

(g) a document prepared and managed by the CDSP which sets out the data items available to the Parties ~~by service (i.e. application programming interface/Data Enquiry Service/Telephone)~~ (the "Data Permissions Matrix").

It is proposed that UNC TPD Section V5 is rationalised, removing the users form V5 along with reference to the data items such users have access to and also removing a number of annexes from Section V.

For the avoidance of doubt, it is intended to retain Clause 5.5.3(f) to a consumer or an appropriate person to the extent designated by the authority within [Standard Special Condition A31 of the Transporter's Licence](#).

Remove the following clauses that define users:

Clause 5.5.2(k)	AlthANCo
Clause 5.5.3(i)	Other User
Clause 5.5.3(j)	Performance Assurance Framework Administrator
Clause 5.5.3(k)	The Energy Theft Tip-off Service ("ETTOS")
Clause 5.5.3(l)	The Theft Risk Assessment Service
Clause 5.5.3(m)	Price Comparison Website and Third Part Intermediary
Clause 5.5.3(n)	Research Body <sup>3</sup>
Clause 5.5.3(o)	The holder of an Electricity Transmission Licence <sup>3</sup>
Clause 5.17	The holder of the Smart Meter Communications Licence
Clause 5.11	Meter Asset Managers
Clause 5.16	Meter Asset Providers
Clause 5.18	Suppliers

The following clause and annexes within TPD Section V5 are proposed to be removed and to some extent be included in the DPM supporting documentation, (formally known as the Operating Guidelines DPM Conditionality), but will otherwise be dealt with by the DPM:

- Annex V-5: Table of Supply Meter and Supply Meter Point data fields available (subject to verification) to the Registered Metering Applicant upon request
- Annex V-8: Historic Supply Meter Point Asset and Read Information is proposed to be relocated to TPD Section M Annex M-2.
- Annex V-9: Table of Supply Meter and Supply Meter Point data fields available (subject to verification and Section V5.16) to the Meter Asset Provider upon request.
- Annex V-10

Clause 1.4.1(a) and (c) and Clause 1.4.2(b) should be amended to point to the Data Permissions Matrix rather than Section V5 for the disclosure of certain information:

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<sup>3</sup> These clauses are subject to implementation of Modifications 0702S and 0715S. Approval has been received for both Modifications: Modification 715S has been implemented and Modification 702S is due to be implemented in July.

- 1.4.1 Direct Functions of the CDSP to support implementation of this Section V are:
- (a) disclosing Supply Meter Point information in accordance with ~~paragraph 5.14~~ **the Data Permissions Matrix**;
  - (c) disclosing MAP information in accordance with ~~paragraph 5.16~~ **the Data Permissions Matrix**; and
- 1.4.2 Agency Functions of the CDSP to support implementation of this Section V are:
- (b) disclosing smart meter data in accordance with ~~paragraph 5.17~~ **the Data Permissions Matrix**; and

It is proposed that additional clauses are added to the UNC to reference:

The CDSP may only disclose information to DPM User types who are not also signatories to the DSC if they have entered into Third Party Services Agreements which comply with the Third-Party Additional Services Policy

The CDSP shall, no later than 31 March in each year, publish a report identifying those DPM Users which have a Third Party Services agreement in place with the CDSP for the disclosure of Protected Information as contemplated by the clause above.

It also proposed that Clause 5.15 Disclosure of Historic Supply Meter Point Asset and Read Information (Annex V-8) is relocated to Section M where the Meter Information is provided to the disclosing User. The reference to Clause 5.15 within Clause 1.4.1(b) should be updated to point to the relocated section within Section M of UNC.

Please note, there are around 11 defined terms within the List of Defined Terms which point to clauses within Code which are being removed. It is proposed under this Modification these defined terms are removed from the list.

For the avoidance of doubt, the following users who are currently detailed within the UNC but not in the DPM will be added to the DPM following the implementation of this modification:

- Energy Theft Tip-Off Service (ETTOS)
- Theft Risk Assessment Service (TRAS)
- The holder of the Smart Meter Communications Licence
- The parties given the power of investigation and consumer issue resolution

## 6 Impacts & Other Considerations

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

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

None

## Cross Code Impacts

A Modification is required to amend both the IGT UNC and the UNC and a cross code Workgroup was requested.

Additionally, two associated IGT Modifications need to be implemented before this Modification and IGT135 can be implemented.

Situation report on associated IGT UNC Modifications:

- Modification IGT134 (Research Body) – Implemented 24 July 2020
- Modification IGT139 (Electricity System Operator) – Implemented on 15 June 2020

Summary, both IGT Modifications, IGT 134 & 139 have completed their governance paths and have been implemented in parallel with UNC Modifications 0702S & 0715S, respectively.

## 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

### Background:

This proposal has been developed over a number of iterations, with the original versions proposing that data access authorisations, as set out in the UNC and the data items and delivery platforms used to provide the service, as set out in the DPM, should be aligned. This meant adding some Data User Types that are specified in the DPM to the UNC, and similarly, adding some Data User Types specified in the UNC to the DPM.

The Data User Types included in the DPM requiring inclusion in the UNC were:

- Authorised Agency Users
- Major Energy Users

The Data User Types included in the UNC, requiring inclusion in the DPM were:

- Energy Theft Tip-Off Service (ETTOS)
- Theft Risk Assessment Service (TRAS)
- Performance Assurance Framework Administrator (PAFA)
- The holder of the Smart Meter Communications Licence (Data Communications Company)

During the development phase, the following facts have come to light and modified the list of Data User Types affected:

1. It was recognised that some “**Authorised Users**”, (such as the Police and the HSE), have statutory powers to investigate crimes, which means that they have a legal right to access data held by the CDSP. Given this high level of authority, it was viewed as superfluous to document these arrangements in the contractual framework. Similarly, Ofgem have

statutory powers and, therefore, do not need to be recognised in the UNC as a Data User Type or listed in the DPM.

2. Also included in the broad category of Authorised Users was access for **Citizens Advice**. Following a government review of Public Bodies enacted in 2014<sup>4</sup>, **Citizens Advice** and **Citizens Advice Scotland** have been the organisations designated with the statutory responsibility for representing gas customers and dealing with customer disputes. As such, it was agreed that these organisations should have their access permissions confirmed and detailed explicitly in the DPM.

It should be noted that the organisations specified above may decide to discharge their obligations through separate arrangements with third-parties. To facilitate operational variations, responsible parties would be specified generically in the DPM, (as detailed in Section 3), and where specific access to data is required by associated parties, such arrangements would be made visible to DSC CoMC and documented in the DPM Conditionality Document.<sup>5</sup>

3. The inclusion of **PAFA** in the DPM was delivered by the implementation of Modification 0707S: Introducing 'Performance Assurance Framework Administrator'<sup>6</sup>.
4. It was clarified that **Major Energy Users** data access arrangements were originally established through SPAA – Schedule 23 and, as is currently the case, access for individual organisations would in future be managed by the CDSP.
5. Major Energy Users have been re-named as **Industrial & Commercial Consumers** for the purposes of inclusion in the DPM.

#### Current approach:

Since the submission of version 4 of the proposal, the proposed solution has changed significantly in scope from the original concept of aligning the DPM to the high-level permissions established in the UNC. Under the new version of the proposal, all Data User Types and their details, would be de-listed from UNC and, generally, the authority and obligation for managing access to CDSP data would be undertaken through DSC governance.

The exception to this overarching DSC governance would be the addition of a **new Data User Type**. To establish a new user, a UNC-governed Modification would need to be approved. Once the Modification is implemented, details of the specific data items available to the new Data User Type, would be managed by the DSC Contract Management Committee. The Workgroup acknowledge that the requirement for a UNC governed Modification to add a new Data User type may be removed as part of the Significant Code Review for the Faster Switching Programme. This will be reviewed at a later date.

The Workgroup is supportive of the move to rationalise data permissions in the UNC and move from the current arrangement where Data User Types are defined/described in the UNC, with the DPM specifying

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<sup>4</sup> [The Public Bodies \(Abolition of the National Consumer Council and Transfer of the Office of Fair Trading's Functions in relation to Estate Agents etc\) Order 2014](#)

<sup>5</sup> Link to the version of the [DPM Conditionality Document](#) drafted to accompany this Modification

<sup>6</sup> [Modification 0707S: Introducing 'Performance Assurance Framework Administrator'](#)

the detail, to one where the DSC-controlled document, specified in UNC GTD5.2.1(g), would be the reference documentation (service catalogue) for recording all aspects of permitted access to CDSP data.

During the development phase of the proposal, two new Data User Types have been recently added to the UNC & DPM, these are:

1. Research Body<sup>7</sup> - Approved by Panel on 21 May 2020 and implemented on 24 July 2020
2. Electricity System Operator<sup>8</sup> - Approved by Panel on 21 May 2020 and implemented on 15 June 2020

Therefore, in-line with the new approach, although only recently added to the UNC, to ensure consistency with this proposal, they have been added to the list of Data User Types to be removed from UNC.

## 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

<sup>7</sup> [Modification 0702S: Introducing 'Research Body' as a new User type to the Data Permissions Matrix and UNC TPD Section V5](#)

<sup>8</sup> [Modification 0715S: Amendment of the Data Permission Matrix to add Electricity System Operator \(ESO\) as a new User type](#)

The Workgroup agreed that the proposed arrangements whereby access to data is controlled though one DSC CoMC governed document, (thereby avoiding the need for replication of specific operational details in the UNC although noting that access for a new Data User Type would still be subject to UNC governance), would rationalise and streamline access to data held by CDSP, thereby assisting and improving the administration of the Code, in accordance with Relevant Objective f).

## 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, while ensuring that implementation is aligned with the parallel IGT UNC Modification.

## 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

This table is based on the legal text for Modification 0697S published on the Joint Office website on 09 June 2020.

TPD SECTION V – GENERAL	Topic	Explanation
Amendment to paragraph 1.4.1 and 1.4.2	CDSP functions	Removal of references to paragraphs 5.11, 5.15 and 5.16 of section V, which are being deleted in this mod. References replaced with a cross reference to the Data Permissions Matrix (DPM), where the relevant information will now be held.
Amendment to paragraph 5.5.2(j)	Information and confidentiality	Deleting section of paragraph which deals with the DPM taking precedent in the event of an inconsistency between the DPM and paragraphs 5.5, 5.11, 5.15-5.18 as all relevant information is being moved to the DPM by this mod. and there will be no inconsistency. Also deleting User type examples.
Amendment to paragraph 5.5.2(k)	Information and confidentiality	Delete existing paragraph 5.5.2(k) as this information is now being included within the DPM and replace with a new paragraph, which states that the CDSP may only disclose Protected Information to Data Permissions Matrix User types who are not also signatories to the DSC if they have entered into Third Party Services agreements which comply with the Third-Party and Additional Services Policy.
New paragraph 5.5.2(l)	Information and confidentiality	New paragraph requiring the CDSP to publish a report identifying those users of the DPM who have a Third Party Services agreement in place for the disclosure of Protected Information by 31 March each year.

<p>Delete paragraphs: 5.5.3(i); 5.5.3(j); 5.5.3(k); 5.5.3(l); 5.5.3(m); 5.5.3(n); 5.5.3(o); 5.11; 5.16; 5.17; 5.18.</p>	<p>Information and confidentiality</p>	<p>These paragraphs are being deleted as the relevant information will be contained within the DPM.</p>
<p>Re-locate paragraph 5.15 of Section V to a new paragraph 4.4 in Section M</p>	<p>Information and confidentiality</p>	<p>Moving paragraph in relation to the disclosure of Historic Supply Meter Point Asset and Read Information to the section of the TPD dealing with meters.</p>
<p>Delete Annex V-5, Annex V-9 and Annex V-10.</p>	<p>Information and confidentiality</p>	<p>These paragraphs are being deleted as the relevant information will be contained within the DPM.</p>
<p>Re-locate Annex V-8 to a new Annex M-2 within Section M of the Transportation Principal Document.</p>		<p>Moving Annex V-8 to a new Annex M-2 as it relates to metering.</p>
<p>Re-number the existing paragraph 5.12 to 5.11 and replace the two cross references to “in this paragraph 5.12” to “in this paragraph 5.11”.</p>	<p>Information and confidentiality</p>	<p>Cross referencing changes following deletions and relocations.</p>
<p>Re-number the existing paragraph 5.13 to 5.12 and replace the cross reference to “of this paragraph 5.13” to “of this paragraph 5.12”.</p>	<p>Information and confidentiality</p>	<p>Cross referencing changes following deletions and relocations.</p>
<p>Re-number the existing paragraph 5.14 to 5.13 and replace the cross reference to “in paragraph 5.14.2 below” to “in paragraph 5.13.2 below” and replace the cross reference to “in</p>	<p>Information and confidentiality</p>	<p>Cross referencing changes following deletions and relocations.</p>

paragraph 5.14.1 above” with “in paragraph 5.13.1 above.”		
Amend the cross references in paragraph 14.1 as follows: from V-6 to V5 and from V-7 to V-6.	Information and confidentiality	Cross referencing changes following deletions and relocations.
Amend the cross references in paragraph 15.1.1(a) as follows: from Annex V-11 to Annex V-7 and from Annex V-12 to Annex V-8.	Information and confidentiality	Cross referencing changes following deletions and relocations.
Re-number the existing Annexes in Section V as follows: V-6 to V5; V-7 to V-6; V-11 to V7 and V-12 to V8.	Information and confidentiality	Cross referencing changes following deletions and relocations.
<b>TPD</b> <b>SECTION M – SUPPLY POINT METERING</b>	<b>Topic</b>	<b>Explanation</b>
Amend all cross references in the new paragraph 4.4 from Annex V-8 to Annex M-2.	Historic Supply Meter Point Asset and Read Information	Cross referencing changes following deletions and relocations.
Amend the cross references in the new paragraph 4.4.3 from V5.15.1 to M4.4.1 and from V5.15.2 to M4.4.2.	Historic Supply Meter Point Asset and Read Information	Cross referencing changes following deletions and relocations.
<b>GENERAL TERMS</b> <b>SECTION D – CDSP AND LINK</b>	<b>Topic</b>	<b>Explanation</b>

Amendment to paragraph 5.2.1(g).	UK Link Manual	This is an amendment to the definition of the DPM, to remove the reference to the services by which a user can access data.
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## Text

### TRANSPORTATION PRINCIPAL DOCUMENT

#### SECTION V – GENERAL

*Amend paragraph 1.4.1 so that it reads as follows:*

1.4.1 Direct Functions of the CDSP to support implementation of this Section V are:

- (a) disclosing Supply Meter Point information in accordance with the Data Permissions Matrix;
- (b) disclosing historic Supply Meter Point asset and read information in accordance with section M4.4;
- (c) disclosing MAP information in accordance with the Data Permissions Matrix; and
- (d) appointing and managing the PAFA.

1.4.2 Agency Functions of the CDSP to support implementation of this Section V are:

- (a) managing the User accession, discontinuance and termination processes;
- (b) disclosing smart meter data in accordance with the Data Permissions Matrix; and
- (c) reporting on the theft of gas.

*Amend paragraph 5.5.2(j) so that it reads as follows:*

5.5.2

(j) to the disclosure of Protected Information by the CDSP in accordance with the provisions of the Data Permissions Matrix (as defined in paragraph 5.2.1(g) of section D of the General Terms). For the avoidance of doubt, a Code Modification is required to add a new User type to the Data Permissions Matrix.

*Delete paragraph 5.5.2(k) and replace with the following:*

5.5.2

(k) The CDSP may only disclose Protected Information to Data Permissions Matrix User types who are not also signatories to the DSC if they have entered into Third Party Services agreements which comply with the Third-Party and Additional Services Policy.

*Add the following as a new paragraph 5.5.2(l):*

5.5.2

(l) The CDSP shall, no later than 31 March in each year, publish a report identifying those users of the Data Permissions Matrix, which have a Third Party Services agreement in place with the CDSP for the disclosure of Protected Information as contemplated by this paragraph 5.5.2(k).

*Delete the following paragraphs: 5.5.3(i); 5.5.3(j); 5.5.3(k); 5.5.3(l); 5.5.3(m); 5.5.3(n); 5.5.3(o).*

*Delete the following paragraphs: 5.11; 5.16; 5.17; 5.18.*

*Re-locate paragraph 5.15 of Section V to a new paragraph 4.4 in Section M.*

*Re-number the existing paragraph 5.12 to 5.11 and replace the two cross references to “in this paragraph 5.12” to “in this paragraph 5.11”.*

*Re-number the existing paragraph 5.13 to 5.12 and replace the cross reference to “of this paragraph 5.13” to “of this paragraph 5.12”.*

*Re-number the existing paragraph 5.14 to 5.13 and replace the cross reference to “in paragraph 5.14.2 below” to “in paragraph 5.13.2 below” and replace the cross reference to “in paragraph 5.14.1 above” with “in paragraph 5.13.1 above.”*

*Amend the cross references in paragraph 14.1 as follows: from V-6 to V5 and from V-7 to V-6.*

*Amend the cross references in paragraph 15.1.1(a) as follows: from Annex V-11 to Annex V-7 and from Annex V-12 to Annex V-8.*

*Delete Annex V-5, Annex V-9 and Annex V-10.*

*Re-locate Annex V-8 to a new Annex M-2 within Section M of the Transportations Principal Document.*

*Re-number the existing Annexes in Section V as follows: V-6 to V5; V-7 to V-6; V-11 to V7 and V-12 to V8.*

## **TRANSPORTATION PRINCIPAL DOCUMENT**

### **SECTION M – SUPPLY POINT METERING**

Amend all cross references in the new paragraph 4.4 from Annex V-8 to Annex M-2.

Amend the cross references in the new paragraph 4.4.3 from V5.15.1 to M4.4.1 and from V5.15.2 to M4.4.2.

## **GENERAL TERMS**

### **SECTION D – CDSP AND UK LINK**

*Amend paragraph 5.2.1(g) so that it reads as follows:*

a document prepared and managed by the CDSP which sets out the data items available to the Parties (the “Data Permissions Matrix”).

Insert text here

## **9 Consultation**

Panel invited representations from interested parties on 20 August 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 6 representations received.

Representations were received from the following parties:

<b>Organisation</b>	<b>Response</b>	<b>Relevant Objectives</b>	<b>Key Points</b>
Cadent	Support	f) - positive	<ul style="list-style-type: none"><li>• Supports the Modification as it removes inconsistencies, misalignment and ambiguity between the UNC and the Data Permissions Matrix (DPM) and removes unnecessary data item details from the UNC.</li></ul>

			<ul style="list-style-type: none"> <li>• Believes that implementation of the Modification could take place 16 days after Modification Panel decision subject to no appeal being raised.</li> <li>• No impacts or costs have been identified and Cadent are satisfied that the Legal Text the intent of the Modification.</li> </ul> <p><b>Panel Question: Respondents are asked to provide views on whether they believe that there are any potential SCR impacts?</b></p> <ul style="list-style-type: none"> <li>• Believes that the Legal Text was drafted, in line with the modification solution, against the version of the UNC available at the time legal text was requested.</li> <li>• Points out that it has since become apparent that TPD V5.17 (which Modification 0697S would remove in its entirety) has been amended by the BEIS consultation therefore the recently added BEIS clauses V5.17.2, 5.17.3 and 5.17.4 would be removed following implementation of 0697S.</li> <li>• Whilst not wishing to delay the implementation of 0697S, further consideration of the best governance route to retain or reinsert V5.17.2, 5.17.3 and 5.17.4 (if required) may be necessary ahead of implementation of 0697S.</li> </ul>
Centrica	Support	f) - positive	<ul style="list-style-type: none"> <li>• Believes that the implementation of the Modification will expedite the process. The oversight of new permissions remaining with UNC will retain an appropriate level of governance.</li> <li>• Does not expect to incur any cost as a shipper for the implementation of this Modification.</li> </ul> <p><b>Panel Question: Respondents are asked to provide views on whether they believe that there are any potential SCR impacts?</b></p> <ul style="list-style-type: none"> <li>• No Comment</li> </ul>
Gazprom Energy	Support	f) - positive	<ul style="list-style-type: none"> <li>• Believes the movement of the detail of data item permissions from UNC to the Data Permissions Matrix (DPM), which falls under the remit of the Contract Management Committee (CoMC), will provide a more efficient experience for users.</li> <li>• Agrees with the Workgroup that the proposed arrangements whereby access to data is controlled through one DSC CoMC governed document, (thereby avoiding the need for replication of specific operational details in the UNC although noting that access for a new Data User Type would still be subject to UNC governance), would rationalise and streamline access to</li> </ul>

			<p>data held by CDSP, thereby assisting and improving the administration of the Code, in accordance with Relevant Objective f).</p> <ul style="list-style-type: none"> <li>• Supports implementation as soon as possible in line with the self-governance procedures.</li> </ul> <p><b>Panel Question: Respondents are asked to provide views on whether they believe that there are any potential SCR impacts?</b></p> <ul style="list-style-type: none"> <li>• No comment provided.</li> </ul>
National Grid NTS	Support	f) - positive	<ul style="list-style-type: none"> <li>• Recognises the benefit of clear governance, including in respect of the management of access to data held in central systems. The existing lack of clarity regarding whether such permissions are managed via a UNC governance process or a Data Services Contract (DSC) process via the Contract Management Committee is inefficient. This presented challenges for National Grid when they recently sought to make arrangements for the holder of an Electricity Transmission Licence to have access to data (UNC Modification 0715S).</li> <li>• Believes that given the clarity, implementation of this Proposal would bring to the administration of the above process, National Grid NTS agree that implementation would better facilitate Relevant <i>Objective f) Promotion of efficiency in the implementation and administration of the code.</i></li> <li>• Agrees that this Proposal does not have a material impact given that it consolidates and clarifies existing governance process as opposed to establishing a new mechanism (or indeed removing one). On this basis National Grid NTS agree that application of self-governance procedures is appropriate.</li> <li>• Is satisfied that the legal text will deliver the intent of the solution. Note that the holder of an ‘Electricity Transmission Licence’ will be retained in the Data Permissions Matrix in order to facilitate access data in central systems by such a Licence holder.</li> </ul> <p><b>Panel Question: Respondents are asked to provide views on whether they believe that there are any potential SCR impacts?</b></p> <ul style="list-style-type: none"> <li>• Are not aware of any specific SCR impacts. Furthermore, it notes that the Draft Modification Report suggests that this change would align the Data Permissions Matrix to the structure set out in the proposed Data Access Matrix</li> </ul>

			being considered under the Ofgem Faster Switching Programme SCR.
NGN	Support	f) - positive	<ul style="list-style-type: none"> <li>• Supports this proposal as the movement of the detail of data item permissions from UNC to the Data Permissions Matrix (DPM), which falls under the remit of the Contract Management Committee (CoMC), will not only allow for a more efficient experience for Users looking to amend their data items, but also will remove the inconsistencies or ambiguity that have arisen over time by the dual management of this process. The high-level permissions, for new User groups requiring access to data, remaining within the UNC lends to transparency and due diligence when considering whether a particular User type has valid reasons to access data in general. In view of these efficiencies we believe this proposal furthers Relevant Objective f) Promotion of efficiency in the implementation and administration of the code.</li> <li>• Believes that this Modification does not appear to be of material impact to parties and therefore meets the self-governance criteria, with a caveat that if this is deemed to impact the SCR, then this implies Authority Direction. Please see response to ‘Panel Question’ below for additional information.</li> <li>• Believes this Modification could be implemented as soon as approval has been given, and any subsequent appeal window has closed.</li> <li>• Believes the legal text provided should deliver the Solution set out in the proposal.</li> <li>• However, notes that the BEIS changes to section V5.17, which added 5.17.2 through to 5.17.4, whilst covered by the legal text statement ‘remove section V5.17’ were only added to the UNC after the modification proposal had been sent to consultation. Therefore, NGN do not feel that this consultation response can take these additional sections into account and ask Panel to consider the governance as to how transparency in relation to the BEIS additions is managed.</li> </ul> <p><b>Panel Question: Respondents are asked to provide views on whether they believe that there are any potential SCR impacts?</b></p> <ul style="list-style-type: none"> <li>• Whilst the addition of the BEIS text is not an SCR impact (as it was instructed under powers under Section 88 of the Energy Act and relates to Smart Metering) it should be noted as a general concern by Panel.</li> </ul>

			<ul style="list-style-type: none"> <li>• Believes that data permission is an area that is being looked at under the SCR, and that there is additional SCR legal drafting being undertaken over the next few months in relation to this. Whilst this leads us to conclude that there is an SCR impact, NGN cannot say whether this is of material impact, and would defer to any statement made by Ofgem in this matter.</li> </ul> <p><b>Additional analysis</b></p> <ul style="list-style-type: none"> <li>• Notes that as CoMC is an established, well governed committee, who should be more than qualified to consider the specifics of the exact data items that a party is requesting, NGN believe that they will give any requests to release new data items informed consideration, calling on additional advice from the CDSP, and other relevant parties, where required.</li> </ul>
SGN	Support	f) - positive	<ul style="list-style-type: none"> <li>• Offers its support for this Modification. Agree with the overall objective set out to simplify the access to data via the Data Permissions Matrix (DPM) eliminating any ambiguity or inconsistency between the UNC and DPM.</li> <li>• Believes that the overarching requirement for new user groups to access data will be retained within the UNC and continue to require a Modification providing visibility and ratification of the requirement for access to data via the DPM.</li> <li>• Agrees that the proposed implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.</li> <li>• Believes that the implementation of this Modification should be coordinated with the corresponding IGT UNC modification (IGT135).</li> <li>• Is satisfied that the legal text will deliver the intent of the solution.</li> <li>• Acknowledges that the BEIS text changes to section V5.17 (V5.17.2, V5.17.3 &amp; V5.17.4) which will be removed in its entirety by this modification were implemented after the conclusion of the workgroup and therefore have not been considered.</li> </ul> <p><b>Panel Question: Respondents are asked to provide views on whether they believe that there are any potential SCR impacts?</b></p> <ul style="list-style-type: none"> <li>• Does not believe that this Modification impacts the SCR and are of the belief that as part of the Faster Switching Programme the Data Permission area of code is being</li> </ul>

			considered. At this time without a statement from Ofgem we are unable to clarify if this will be of a material nature.
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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.

## 10 Panel Discussions

### Discussion

The Panel Chair summarised that this Modification seeks to rationalise UNC TPD Section V5 and remove inconsistency with the Data Permissions Matrix.

Panel Members considered the six representations made, noting that implementation was unanimously supported.

Panel Members noted that 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, while also ensuring that implementation is aligned with the parallel IGT UNC Modification.

A Panel Member commented on the impact of this Modification on the SCR and the required changes to UNC proposed by BEIS<sup>9</sup> relating to the Smart Energy Code. After exploration it appears that the drafting would be impacted. This meant that Modification 0697S changes part of Code 'in-scope' of live SCRs.

Panel Members confirmed that whilst Modification 0697S was out at consultation, it became apparent that TPD V5.17 (which Modification 0697S would remove in its entirety) was to be amended by the BEIS consultation. Therefore, the clauses added by the BEIS consultation (TPD V5.17.2, 5.17.3 and 5.17.4) as part of Code Update v5.49 on 25 August 2020, would be removed following implementation of Modification 0697S.

The CDSP representative confirmed for Panel that at DSC Contract Management Meeting on Wednesday 16 September 2020 the data required (as part of the BEIS Consultation) by the DCC was agreed to be released.

The Ofgem representative confirmed Ofgem's view that Modification 0697S should be allowed to continue through the UNC Process.

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<sup>9</sup> BEIS Consultation 14 January 2020 on a number of matters that require amendments to the standard conditions of gas and electricity supply licences, the DCC licence and the Smart Energy Code (SEC), the Uniform Network Code (UNC) and the Master Registration Agreement (MRA). The changes to the UNC and MRA aim to provide for DCC to receive additional information on the number of Advanced Meters each supplier has installed in support of proposed changes to the DCC charging methodology. The changes to the UNC are to be found in UNC Transportation Principal Document (Section V) paragraph 5.17.

Note also that BEIS phase 1 (June 2020) went into Code v5.49 on 25 August 2020; Phase 2 is expected to be in Code later in September 2020.

Panel Members discussed options to resolve the situation and noted that two options had been explored through correspondence with parties involved, prior to the Panel meeting. An option that could be pursued is a minor variation to Modification 0697S and the Legal Text for 0697S.

Panel Members discussed the option of deferring the decision to the next Panel meeting but decided against this as it would delay implementation of the Modification unnecessarily. Panel Members agreed to consider the option of an immaterial variation to Modification 0697S and the Legal Text for 0697S.

Panel reviewed the draft Variation Request put forward at extremely short notice, which provided changes to the legal text in order to accommodate the BEIS changes. The Variation Request can be found here: <https://www.gasgovernance.co.uk/0697>

The changes to the Legal Text suggested are reproduced here for clarity:

### Nature of Variation

The following amendments are proposed to the legal text contained within UNC TPD Section V, paragraph 5.17, in order to preserve the intent of the BEIS (June 2020) amendments (limited to the inclusion of new paragraphs 5.17.2 through to, and including 5.17.4).<sup>1</sup>

*Amend TPD Section V5.17 to read as follows:*

#### **5.17 Smart Meter Data Provision to Data Communications Company**

~~5.17.1 Not Used. 5.17.1 The CDSP is authorised to disclose such data as is set out within Annex V 10 to the holder of the “smart meter communications licence” as defined by Statutory Instrument 2012 No.2400: The Electricity and Gas (Smart Meters Licensable Activity) Order 2012. Such data may relate to all Supply Meter Points regardless of status and includes Supply Meter Points which are located on the network of an Independent Gas Transporter where provided to the CDSP.~~

5.17.2 The CDSP shall, with effect from calendar month October 2020 onwards, provide to the holder of the “smart meter communications licence”, the data, in respect of each Supplier, referred to in paragraph 5.17.3 by no later than the end of each calendar month (the ‘relevant calendar month’).

5.17.3 The data to be provided to the holder of the “smart meter communications licence” in respect of each Supplier is the number of Supply Points that relate to Designated Premises at which on the 15<sup>th</sup> day of the relevant calendar month:

- (a) the Supplier is the relevant Supplier in relation to the Registered User at the Supply Point; and
- (b) the supply of gas is measured by an Advanced Meter.

5.17.4 For the purposes of paragraph 5.17.3:

- (a) “Advanced Meter” has the meaning given to that term in the Supplier’s Licence
- (b) “Designated Premises” has the meaning given to that term in the Supplier’s Licence.
- (c) “Supply Point” includes a Supply Meter Point which is located on the network of an Independent Gas Transporter in respect of which the relevant data has been provided to or is held by the CDSP under and in accordance with the Independent Gas Transporters Uniform Network Code.

Panel Members then formally considered the Variation Request and determined unanimously to accept the (immaterial) Variation Request for Modification 0697S. The Proposer of Modification 0697S indicated he would withdraw the Modification.

Panel Members discussed the impact of Modification 0697VS on the SCRs and expressed concern that there remained an impact, albeit Panel Members acknowledged it was now possible to mitigate that impact.

The Ofgem representative confirmed for Panel Members that it was Ofgem's view regarding Modification 0697VS, notwithstanding Panels' vote that this impacted the SCR insofar as it changes part of code 'in-scope' of live SCRs, that they were content for the Modification to proceed through UNC Modification process.

Panel members discussed the consequence of indicating that a Modification has an impact on an SCR in terms of the governance of the Modification, noting that it appeared usual for such a Modification to move from Self-Governance to Authority Direction. The Ofgem representative confirmed for Panel Members that it was Ofgem's view that Modification 0697VS should remain as a Self-governance Modification.

### Determinations Part 1 of 2

Panel Members voted unanimously that Modification 0697VS does have an SCR impact, but Panel Members also noted Ofgem's view indicating they were content for the Modification to proceed through UNC Modification process.

Panel Members voted unanimously that no new issues were identified as part of consultation.

### Consideration of the Relevant Objectives for Modification 0697VS

Panel Members noted that only one Relevant Objective was indicated to be positively impacted by this Modification, namely Relevant Objective f) - *Promotion of efficiency in the implementation and administration of the Code*.

Panel Members agreed with the Proposer, Workgroup and consultation respondents that Relevant Objective f) - *Promotion of efficiency in the implementation and administration of the Code* will be furthered by this Modification because the proposed arrangements, whereby access to data is controlled though one DSC Contract Management Committee governed document would rationalise and streamline access to data held by CDSP, thereby assisting and improving the administration of the Code.

### Determinations Part 2 of 2

Panel Members voted unanimously to implement Modification 0697VS.

## 11 Recommendations

### Panel Determination

Panel Members agreed:

- that Modification 0697VS should be implemented.