

UNC Final Modification Report		At what stage is this document in the process?
<h1>UNC 0668S:</h1> <h2>Amendment of the Data Permission Matrix to add Alt Han Company as a new User type</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 01 Modification </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>This Modification seeks to amend the Data Permission Matrix to add Alt Han Company (AltHANCo) as a new User type.</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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Timetable		
Modification timetable:		
Initial consideration by Workgroup	27 September 2018	
Workgroup Report presented to Panel	20 December 2018	
Draft Modification Report issued for consultation	20 December 2018	
Consultation Close-out for representations	10 January 2019	
Final Modification Report available for Panel	11 January 2019	
Modification Panel decision	17 January 2019	
An equivalent Modification has been raised for the IGT UNC, and the two Modifications were developed at one Workgroup.		

 Any questions?

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1 Summary

What

AltHANCo is requesting access to data governed under the UNC / Data Services Contract (DSC). To be able to submit a request to create the permission for the disclosure of data to AltHANCo, AltHANCo needs to be added as a new User type to the Data Permission Matrix.

Modification 0649S - Update to UNC to formalise the Data Permission Matrix, 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 (CoMC). A request for disclosure of data is made by a disclosure request report, following the procedure agreed with the CoMC as set out in the operating guidelines document – the disclosure of Protected Information by Xoserve of data held in its role as the Central Data Services Provider (CDSP), a document governed under the CoMC.

Why

Certain properties e.g. flats, where the meter and the in-home display are far apart and the Home Area Network (HAN) is not sufficient for meter to in home display communications, they instead require an Alternative Home Area Network (AltHAN) for communications. This change is required to add AltHANCo to the Data Permission Matrix. Once this is completed (via this Modification), a disclosure request report will be submitted to the Data Services Contract CoMC, to gain approval for the specific data items to be permitted to be disclosed to AltHANCo. AltHANCo is requesting access to a data set to enable these types of properties to be identified in advance of smart meter installations for an efficient roll-out of smart meters. The dataset being requested will be used along with other data available to AltHANCo to:

- Exclude properties for which an alternative home area network is not required e.g. supply meter points for which a smart meter installation is not required or supply meter points where a smart meter is already installed;
- Identify candidate supply meter points where an alternative home area network is likely to be required, which can then be subject to a site survey.

How

This enabling Modification is proposing to add AltHANCo as a new User type for inclusion in UNC Section V and to the Data Permission Matrix.

2 Governance

Justification for Self-Governance, Authority Direction or Urgency

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

As there is an IGT UNC Modification (IGT116), both followed the same governance and Workgroup process.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to self-governance
- issued to consultation.

The Workgroup agrees that this Modification should follow Self-Governance procedures as it aims include Alt Han Co as an eligible party for the provision of data by their inclusion in the Data Provision Matrix. This is not considered to be a material change and facilitates the process for data provision managed of the DSC Contract Management Committee, which will be responsible for ensuring the suitability of any data to be provided.

3 Why Change?

Certain properties e.g. flats, where the meter and the in-home display are far apart, and the Home Area Network is not sufficient for meter to in home display communications require an Alternative Home Area Network for communications. This change is required to add AltHANCo as a new User type to the Data Permission Matrix. This will then enable a request for the disclosure of specific data to be submitted to the DSC Contract Management Committee for approval.

Privacy Impact Assessment (PIA)

A number of tests are used to determine whether a PIA is required. This request is for access for a new party who have not previously had routine access to the information and the disclosure is for the complete supply point register.

A PIA is to be made available for assessment by the DSC Contract Management Committee.

4 Code Specific Matters

Reference Documents

The Alternative Home Area Network (AltHAN) arrangements are set out in Section Z of the Smart Energy Code (SEC) and there are two key mechanisms that facilitate the delivery of the arrangements.

The Alt HAN Forum makes decisions required to carry out the activities and services of the Alt HAN Company (AltHANCo). In doing so it can delegate and give direction to the AltHANCo.

The Forum is made up of Relevant Supplier Parties, who operate in the GB Smart Metering market, nominated and elected in accordance with the processes detailed in Section Z of the SEC. <https://www.althanco.com/>

5 Solution

This enabling Modification is proposing to add the AlthANCo as a new User type to the Data Permission Matrix.

The data is required by AlthANCo for the identification of potential alternative HAN candidates only and should be for the duration of AlthAN rollout – the permissions need to be reviewed and seek to be revoked once rollout has concluded or there is a no-go decision on contacts with AlthANCo.

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 as this is a permissions Modification to permit the release of data to AlthANCo that may lead to benefits to the consumer. However, this is subject to confirmation by the PIA.

Cross Code Impacts

A joint Workgroup was established to include this Modification and IGT UNC Modification 116.

EU Code Impacts

None.

Central Systems Impacts

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

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;	None

(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 AltHANCo to the Data Permission Matrix. This Modification is less onerous than creating bespoke permissions for AltHANCo within the main body of the UNC and 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

Legal Text was provided by Scotia Gas Networks and there were no issues identified by the Workgroup.

Text Commentary

Update to UNC to formalise the addition of Alt Han Company as a new User type of the Data Permission Matrix

Text

UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT

SECTION V – GENERAL

Add a new paragraph 5.5.2(k):

- 5.5.2 (k) in accord with the provisions of paragraph 5.5.2(j) and to the disclosure of Protected Information by the CDSP the Data Permissions Matrix (as further defined at paragraph 5.2.1(g) of section D of the General Terms) shall be amended to specifically authorise Alt Han Company (number 10002859) (“**AltHANCo**”) as a new User type. For the avoidance of doubt and notwithstanding the provisions of this clause, the right to review the authority granted to a new User type shall be reserved.

10 Consultation

Panel invited representations from interested parties on 20 December 2018. 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 8 representations received 6 supported implementation and 2 offered qualified support.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
BUUK	Qualified Support	f - positive	<ul style="list-style-type: none"> Supports the proposed Modification to add the Alt Han Company as a new user type to the Data Permissions Matrix. Believe that in doing so this Modification will positively support the Smart Meter rollout. Is comfortable that Alt Han has legitimate reasons for the access to this data and therefore enables it to fulfil their obligations. The qualified support is given on the grounds that UNC 0668S is implemented in line with IGT UNC 116. This Modification should be implemented as soon as possible, but also in line with the IGT UNC 116 to ensure completeness between the two Codes.
Cadent	Support	f - positive	<ul style="list-style-type: none"> Offers support as this is simply an enabling Modification which will add AltHANCo as a new User type to the Data Permissions Matrix. Any subsequent requests for data access and approval of such requests will be managed through the DSC Contract Management Committee. Agrees with the self-governance statement.
EDF Energy	Support	f - positive	<ul style="list-style-type: none"> Believes that accurate identification of the premises that require the installation of alternative HAN solutions will be critical to the economic and efficient rollout of Alt HAN to consumers, enabling more of them to access the benefits of smart metering. Supports this Modification and the sharing of relevant information with AltHANCo in the most efficient manner. Agrees the legal text will deliver the intent of the Modification.
E.ON	Support	f - positive	<ul style="list-style-type: none"> Supports the creation of AltHANCo as a new user and any further requirements are developed and approved via the

			<p>DSC Contract Management Committee.</p> <ul style="list-style-type: none"> • Supports the change progressing as self-governance as it does not have any impacts on competition, security of supply or directly on consumers. • Implementation should be as soon as possible but both the IGT UNC and the UNC should be aligned.
npower	Support	f - positive	<ul style="list-style-type: none"> • Agrees that these changes are required to support the rollout of the Alternate Home Area Network, and implementation should be as soon as practicable.
Scottish Power	Support	f - positive	<ul style="list-style-type: none"> • Agrees this is a non-material enabling Modification and therefore suitable for self-governance as any data provision will be managed via the DSC Contract Management Committee.
Scotland Gas Networks and Southern Gas Networks	Qualified Support	f - positive	<ul style="list-style-type: none"> • While offering Qualified Support, agrees with the overall objective of this Modification, and positively support any steps to help ensure all homes regardless of type and location can have the choice of a Smart Meter. • Is keen to develop a better understanding as to how the proposed data access and the actual Alternative Home Network technology will work in practice. • This Modification will add AltHANCo as a new User type to the Data Permission Matrix, which will in turn enable a request for the disclosure of specific data items to be submitted to the DSC Contract Management Committee for approval. • Feels that every effort should be made to share only the information for the actual properties that can benefit from the Alt Han technology, and sharing the data for all supply points is very much against GDPR data minimisation guidelines. • Agrees that implementation should be as soon as possible and as there is a related IGT UNC Modification, the implementation of the IGT UNC 116 and UNC 0668S should be aligned.
Wales & West Utilities	Support	f - positive	<ul style="list-style-type: none"> • Feels this Modification allows the AltHANCo to be a party to which certain Protected Information may be released if subsequently authorised by the DSC Contract Management Committee. • Is satisfied that the AltHANCo does have a legitimate reason to require access to some Protected Information to enable it to discharge its obligations. Noting this Modification does not directly authorise the release of such information.

			<ul style="list-style-type: none"> • Agrees that this Modification should be subject to self-governance procedures as it is unlikely to have a material effect on gas consumers, competition, pipeline operations, security of supply, governance procedures and it does not discriminate between Code parties. • This Modification should be implemented as soon as possible on or after 16 Business Days after a Panel determination to implement in coordination with the corresponding IGT UNC 116.
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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 considered when the UNC Modification Panel makes its assessment and recommendation.

11 Panel Discussions

Discussion

Panel Members noted that Modification 0668S would amend the Data Permission Matrix to add Alt Han Company (AlthANCo) as a new User type. Panel Members highlighted this Modification will only allow the release of data to AlthANCo.

Panel Members noted that of the 8 representations received 6 supported implementation and 2 offered qualified support.

Panel Members support respondents view that UNC 0668S is implemented in line with IGT UNC 116.

Panel Members note that any data provision will be managed via the DSC Contract Management Committee and that a respondent believes that every effort should be made to share only the information for the actual properties that can benefit from the Alt Han technology, and sharing the data for all supply points is very much against GDPR data minimisation guidelines. It was also highlighted that such discussions have been held at the DSC Contract Management Committee and the disclosure request has been deferred to allow these points to be addressed.

Consideration of Relevant Objectives

Panel Members unanimously agreed with the representations that Relevant Objective f) is furthered by this Modification Proposal.

Determination

Panel Members were unanimously of the view that no new issues were raised within the consultation.

12 Recommendations

Panel Determination

Members agreed that Modification 0668S should be implemented.