

UNC Final Modification Report	At what stage is this document in the process?
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UNC 0762S:

Adding the Retail Energy Code Company as a new User type to the Data Permissions Matrix

01	Modification
02	Workgroup Report
03	Draft Modification Report
04	Final Modification Report

Purpose of Modification:

The Retail Energy Code Company (RECCo) are responsible for ensuring the proper, effective, and efficient implementation and ongoing management of the Retail Energy Code (REC). In addition to other industry data sources the UK Link system will provide a logical and efficient source of data to support this objective. This Modification seeks to amend the UNC Data Permissions Matrix (DPM) to add the Retail Energy Code Company as a new User type.

	The Panel determined that this Self-Governance Modification be implemented
	High Impact: None identified
	Medium Impact: None identified
	Low Impact: CDSP, Shipper Users, Transporters and IGT UNC

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Timetable		
Modification timetable:		
Pre-modification Discussion	25 March 2021	
Initial consideration by Workgroup	22 April 2021	
Workgroup Report presented to Panel	20 May 2021	
Draft Modification Report issued for consultation	20 May 2021	
Consultation Close-out for representations	04 June 2021	
Final Modification Report available for Panel	09 June 2021	
Modification Panel decision	17 June 2021	

 Any questions?

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1 Summary

What

The Retail Energy Code Company (RECCo) are responsible for ensuring the proper, effective, and efficient implementation and ongoing management of the Retail Energy Code (REC). In order to perform this activity, a Code Manager will be appointed from time to time by the RECCo and as such this party will need to have access to the data that is permitted to the RECCo within the DPM. Reporting services will be provided by Xoserve as a third-party service under the DSC. The third-party services contract between Xoserve and RECCo will reflect the requirement for data to be shared with the RECCo appointed Code Manager as and when required to perform its obligations under the REC.

As an example of an expected use case, a function of the Code Manager is Performance Assurance which will monitor the performance of the REC parties. The UK Link system provides a logical source for reporting to support assessment of a number of activities that are defined in the REC, such as metering and meter reading and also, until implementation of the Central Switching System, potentially registration.

The REC Code Manager has recently been appointed so is still developing the Performance Assurance reporting framework but intends to have this defined and established ready for Retail Code Consolidation (REC v2) in September 2021. Whilst it is proposed that the RECCo is added to the REC v2 Significant Code Review (SCR) for the Ofgem Switching Programme, this will not take effect until September 2021. In order to support the development of these reports, and any other use cases, the RECCo needs to be added to the DPM prior to September 2021.

Why

In line with UNC Legal Text implemented for Modification 0649S - Update to UNC to formalise the Data Permissions Matrix, a new Modification is needed to add a new User type to the DPM.

Currently, the CDSP does not have the permissions to release data to RECCo, which would mean that any data that is required would need to be sourced from satellite systems held in individual organisations rather than provided from a single consistent source.

How

This enabling Modification proposes to add the Retail Energy Code Company to the Data Permissions Matrix (DPM). Where a need to access UNC Protected Information is identified by the RECCo, for themselves or the Code Manager as their contractors, each instance will be assessed by Xoserve against the DPM and DPM Conditionality Document. If the request is for data that is additional to that permitted within the DPM, a DRR will be raised for approval by DSC Contract Management Committee.

The third-party services contract between Xoserve and RECCo will reflect the requirement for data to be shared with the RECCo appointed Code Manager as and when required to perform its obligations under the REC.

The process for requesting access by RECCo and/or a RECCo Code Manager has yet to be defined but the principal will be that should a request from a RECCo Code Manager be received directly, Xoserve will assess as if it were a request from RECCo and as such it should demonstrate the REC obligation the request sets out to achieve and RECCo will be asked to confirm the request should this be in question.

2 Governance

Justification for Self-Governance

This enabling Modification is proposed as self-governance as it will not have a negative effect on consumers, it will not discriminate between classes of parties within the UNC, nor will it impact competition.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to self-governance.
- be assessed by a Workgroup.

The Proposer suggests that this Modification can be finalised within two Workgroups as the principle described in this modification are well established and has been set out in a number of Ofgem consultations.

3 Why Change?

Separately it was planned that RECCo would be added to the DPM as part of the UNC changes under the Significant Code Review for Retail Code Consolidation (REC v2). Since this will not take effect until 01 September 2021 this modification now proposes to do so in advance of this date to support transition to these arrangements.

In order for the RECCo to prepare for REC v2 Go Live when the Performance Assurance regime within the REC takes effect, the CDSP has been asked to support the development of the reporting with the Code Manager. In order to effectively develop these reports, permission is required to share the reporting, including actual data, with the RECCo. If the data cannot be made available, it is likely to compromise the effectiveness of the REC reporting framework.

Once RECCo are recorded on the DPM we anticipate that further use cases will be identified for provision of data. These will be managed through the DSC Contract Management procedures.

The DPM is the framework that permits the CDSP to release data to specific named parties. In order to add a party to the DPM a UNC Modification is required see UNC TPD V5.5.2(j).

4 Code Specific Matters

Reference Documents

The Data Permission Matrix (which includes the Conditionality Document) is published on Xoserve.com.

Knowledge/Skills

None identified.

5 Solution

This Modification will add the Retail Energy Code Company to the Data Permission Matrix.

For the avoidance of doubt report requests to access UK Link Data are managed through the DSC Contract Management Committee and are not included in the scope of this Modification. The third party services contract between Xoserve and RECCo will reflect the requirement for data to be shared with the RECCo appointed Code Manager as and when required to perform its obligations under the REC.

6 Impacts & Other Considerations

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

As referenced above this Modification is linked to the Ofgem Switching Programme SCRs. This will add the Retail Energy Code Company to the DPM in advance of, but consistent with, the changes in the Significant Code Review.

Consumer Impacts

Data relating to all consumers groups would be available if specified in the reporting and sanctioned by DSC Contract Management Committee.

Cross Code Impacts

As referenced, this will provide data that is collated and mastered under the UNC to the Retail Energy Code Company.

Workgroup was advised that an IGT UNC Modification would be proposed by an IGT party, and accordingly, Modification 0155 was raised on 07 May 2021.

EU Code Impacts

No specific impacts identified.

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 and reports requested.

Workgroup Impact Assessment

The Workgroup are comfortable with the proposed modification which would lead to RECCo being set up as a User type on the DPM, with further details of the data access arrangement being documented in the DPM - Conditionality Document. The Workgroup is aware of this second layer of governance and noted that it is proposed that the Disclosure Request Report (DRR) is processed in parallel through the DSC Contract Management Committee in order to request access to actual data items.

Rough Order of Magnitude (ROM) Assessment

As noted above, as new Users may be added to the DPM without the need for a system or process changes, no ROM is 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 provides a more efficient means for the CDSP to release data to the RECCo consistent with the principle of development of the DPM. This is consistent with other similar changes for the release of Data to identified organisations listed in the DPM, with the actual data to be released to be agreed via the process established by the DSC Contract Management Committee and therefore further Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code.

The Workgroup concurs with rationale expressed in the above statement.

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.

9 Legal Text

As this is an enabling Modification, no Legal Text is required to be provided by Transporters. This Modification has been raised in accordance with UNC TPD Section V5.5.2(j) which stipulates that to add a User type to the DPM, the change must be approved by way of UNC governance. Accordingly, the UNC would not be modified by implementing this proposal, the only change resulting from implementation would be to add a new column in the DPM, headed with the new User type.

10 Consultation

Panel invited representations from interested parties on 20 May 2021. 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 5 representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
Cadent	Support	f) - positive	<ul style="list-style-type: none"> • Cadent support the RECCo being added as a new User Type to the Data Permissions Matrix. Cadent's view is this furthers Relevant Objective f). • Cadent agree with the proposer that implementation can take place 16 business days after Panel decision subject to no appeal being raised. • Cadent are happy that the Legal Text meets the requirements of the Modification Solution.
Northern Gas Networks (NGN)	Support	f) - positive	<ul style="list-style-type: none"> • Believe the addition of the Retail Energy Code Company (RECCo) to the Data Permissions Matrix (DPM) should grant them access to UK Link data items, subject to Contract Management Committee (CoMC) approval, which they need under the third-party services contract with Xoserve. • Provision of this data should allow the RECCo to access the required data to aid in effective and efficient management of the REC. This allows provision of the data via the most efficient means under UNC, therefore furthering Relevant Objective f) the promotion of efficiency in the implementation and administration of the Code. • This proposal should follow self-governance procedures as it only seeks to introduce 'Retail Energy Code Company' as a User Type in the DPM with the data items being managed by CoMC, and proposes no changes to party obligations,

			<p>systems or processes.</p> <ul style="list-style-type: none"> • This proposal could be implemented sixteen business days after Modification Panel approval, subject to no appeal being raised. • No required analysis, development or ongoing costs have been identified for NGN as a result of this proposal. • Believe that no legal text is required as this is an enabling modification only.
Scotland Gas Networks and Southern Gas Networks (SGN)	Support	f) - positive	<ul style="list-style-type: none"> • SGN is supportive of this modification as it will allow the Central Data Service Provider (CDSP) to release data to the Retail Energy Code Company (RECCo). • This modification proposes to add the Retail Energy Code Company to the Data Permissions Matrix which will allow RECCo to request UNC related data when they have identified an instance where such data is required. Each data request from RECCo will be assessed by the CDSP against the Data Permissions Matrix. • If this modification is not approved, then it may compromise the obligations set out in the Retail Energy Code reporting framework. • Agree that this modification follows the criteria for self-governance. • Believe that this modification could be implemented sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised. • SGN are mindful that there is a related IGT UNC modification (IGT155) and therefore both the IGT UNC and UNC modifications implementation dates should be aligned.
ScottishPower	Support	f) - positive	<ul style="list-style-type: none"> • ScottishPower is in support of adding the Retail Energy Code Company (RECCo) as a new User type in the UNC Data Permissions Matrix. • This modification seeks to give permission to the CDSP to release UNC related data to RECCo where a need has been identified. This will aid the development of Performance Assurance reporting and other use cases prior to September 2021. • Satisfied self-governance criteria has been met. • ScottishPower would require no lead time and implementation could be sixteen business days after a decision has been made by Panel, subject to no appeal being raised.

			<ul style="list-style-type: none"> Highlights that there is a cross code modification IGT155 and recommend both UNC & IGT implementation dates align. This is an enabling modification therefore no legal text is required.
Wales & West Utilities	Support	f) - positive	<ul style="list-style-type: none"> Agree that this modification furthers relevant objective (f) <i>Promotion of efficiency in the implementation and administration of the Code</i> by enabling REC Co to be added as a new user type for data access. The DSC contract committee will authorise access to specific data items. Agree that the self-governance criteria are met. This should be implemented as soon as possible to enable access to f) - positive <i>data</i> to be made available and reports developed by REC service providers by 01 September 2021 when REC v2.0 goes live.

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

The Panel Chair summarised that Modification 0762S would amend the UNC Data Permissions Matrix (DPM) to add the Retail Energy Code Company as a new User type.

Panel Members considered the representations made noting that implementation was unanimously supported in the 5 representations received.

Panel Members agreed with respondents and the Proposer that this modification would add the Retail Energy Code Company to the Data Permissions Matrix which will allow RECCo to request UNC related data when they have identified an instance where such data is required. Each data request from RECCo will be assessed by the CDSP against the Data Permissions Matrix.

Panel Members highlighted that there is a cross code modification IGT155 and recommended both UNC & IGT implementation dates align.

Consideration of the Relevant Objectives

Panel Members considered Relevant Objective f) *Promotion of efficiency in the implementation and administration of the Code*, agreeing that implementation would have a positive impact because this Modification provides a more efficient means for the CDSP to release data to the RECCo consistent with the principle of development of the DPM. This is consistent with other similar changes for the release of Data to identified organisations listed in the DPM, with the actual data to be released to be agreed via the process established by the DSC Contract Management Committee.

Determinations

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

Panel Members voted with 11 votes in favour (out of a possible 13), that Modification 0762S does have an SCR impact. Panel Members agreed that the impact is positive and enables the SCR.

The Independent UNC Modification Panel Chair invited the Ofgem representative who confirmed that, notwithstanding the positive impact of Modification 0762S on the SCR, Panel Members should proceed to an implementation vote.

Panel Members voted unanimously to recommend implementation of Modification 0762S.

12 Recommendations

Panel Determination

Panel Members agreed:

- that Modification 0762S should be implemented.