





UNC Modification		At what stage is this document in the process?
<h1>UNC 0697S:</h1> <h2>Alignment of the UNC TPD Section V 5 and the Data Permissions Matrix</h2>		<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
Purpose of Modification: <p>This modification seeks to rationalise UNC TPD Section V5 and remove inconsistency with the Data Permissions Matrix.</p>		
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none">subject to self-governanceassessed by a cross code UNC/IGT UNC Workgroup <p>This modification will be presented by the Proposer to the Panel on 19th September 2019. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>	
	<p>High Impact:</p> <p>None</p>	
	<p>Medium Impact:</p> <p>None</p>	
	<p>Low Impact:</p> <p>Transporters, Shipper Users, CDSP</p>	

Contents

1	Summary	3
2	Governance	4
3	Why Change?	4
4	Code Specific Matters	4
5	Solution	5
6	Impacts & Other Considerations	5
7	Relevant Objectives	8
8	Implementation	9
9	Legal Text	9
10	Recommendations	9

? Any questions?


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Timetable

The Proposer recommends the following timetable:

Initial consideration by Workgroup	26 September 2019
Workgroup Report presented to Panel	21 May 2020
Draft Modification Report issued for consultation	21 May 2020
Consultation Close-out for representations	12 June 2020
Final Modification Report available for Panel	18 June 2020
Modification Panel decision	16 July 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.

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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.

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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.

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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 type¹ 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 it 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” - 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 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)

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

- 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.

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4 Code Specific Matters

Reference Documents

Data Permissions Matrix and supporting **Operating Guidelines DPM Conditionality** documents that specifies the parties, data items and delivery medium and 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.

5 Solution

Clause 5.5.2(j) within Section V – General should be amended to remove the sentence regarding the Data Permissions Matrix taking precedent if there is an inconsistency with V5. 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 paragraph 5.2.1(g) of section D of the General Terms). ~~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

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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.

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GT-D 5.2.1(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 to 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 Body²~~
- ~~Clause 5.5.3 (o) – The holder of an "Electricity Transmission Licence"²~~
- 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

² These clauses are subject to implementation of Modifications 0702 and 0715. Approval has been received for both Modifications and they are currently awaiting implementation.

The following clause and annexes within UNC TPD Section V5 are proposed to be removed and to some extent be included in the DPM supporting documentation (formly 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-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

Annex V–8 – Historic Supply Meter Point Asset and Read Information is proposed to be relocated to Annex M – 2.

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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 V5 for the disclosure of certain information:

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

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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 is to be requested.

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.

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

Adding entities specified in UNC TPD Section V to the DPM and removing reference to specific data items within UNC which are now covered under the DPM will further relevant objective (f) as it ensures that the body of the UNC is simplified 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

Text Commentary

Not provided (at this point)

Text

Not provided (at this point)

10 Recommendations

Proposer’s Recommendation to Panel

Panel is asked to:

- Agree that self-governance procedures should apply
- Refer this Modification to a cross code Workgroup for assessment.