

Joint Office

enquiries@gasgovernance.co.uk

09 September 2020

Dear Sir or Madam,

Re: 0697S Alignment of the UNC TPD Section V5 and the Data Permissions Matrix

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Modification Proposal.

Reason for support/opposition:

Please summarise (in one paragraph) the key reason(s)

We support 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.*

Self-Governance Statement:

Please provide your views on the self-governance statement.

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.

Implementation:

What lead-time do you wish to see prior to implementation and why?

We believe this modification could be implemented as soon as approval has been given, and any subsequent appeal window has closed

Impacts and Costs:

What analysis, development and ongoing costs would you face?

No significant impacts or costs to NGN have been identified as a result of this proposal.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the Solution?

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We believe the legal text provided should deliver the Solution set out in the proposal. However we note that the BEIS changes to section V 5.17, which added 5.17.2 through to 5.17.4, whilst covered by the legal text statement 'remove section V 5.17' were only added to the UNC after the modification proposal had been sent to consultation. Therefore, we 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.

Panel Question: Respondents are asked to provide views on whether they believe that there are any potential SCR impacts?

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.

We believe 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, we cannot say whether this is of material impact, and would defer to any statement made by Ofgem in this matter.

Please provide below any additional analysis or information to support your representation.

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. We 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.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
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Mobile: 07580 215 743

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