

Representation - Draft Modification Report UNC 0697S

Alignment of the UNC TPD Section V5 and the Data Permissions Matrix

Responses invited by: **5pm on 11 September 2020**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Phil Lucas
Organisation:	National Grid NTS
Date of Representation:	11 September 2020
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

National Grid NTS 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 we recently sought to make arrangements for the holder of an Electricity Transmission Licence to have access to data (UNC Modification 0715S).

Given the clarity implementation of this Proposal would bring to the administration of the above process, we agree that implementation would better facilitate relevant objective f) Promotion of efficiency in the implementation and administration of the code.

Self-Governance Statement:

We agree 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 we agree that application of self-governance procedures is appropriate.

Implementation:

National Grid NTS does not require a specific lead time in order to implement this Proposal

Impacts and Costs:

National Grid NTS will not incur any specific cost in order to implement this Proposal.

Legal Text:

We are satisfied that the legal text will deliver the intent of the solution. We 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.

Modification Panel Members have requested that the following questions are addressed:

Q1: Respondents are asked to provide views on whether they believe that there are any potential SCR impacts

We are not aware of any specific SCR impacts. We note 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 being considered under the Ofgem Faster Switching Programme SCR.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

We have not identified any such errors or omissions.

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

N/A