Joint Office of Gas Transporters

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

UNC 0707S:

Introducing 'Performance Assurance Framework Administrator' 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:

Currently the Performance Assurance Framework Administrator (PAFA) is provided with the reports defined in the Performance Assurance Report Register (PARR) in order to fulfil their obligations. This modification seeks to amend the Data Permissions Matrix to add the PAFA as a new User type.

	Panel consideration is due on 19 March 2020 *(at short notice by prior agreement)*
	High Impact: None identified
	Medium Impact: None identified
	Low Impact: Transporters, Shipper Users, CDSP, IGT UNC

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Timetable

Modification timetable:

Initial consideration by Workgroup	28 November 2019
Workgroup Report presented to Panel	20 February 2020
Draft Modification Report issued for consultation	21 February 2020
Consultation Close-out for representations	12 March 2020
Final Modification Report available for Panel	13 March 2020
Modification Panel decision	19 March 2020 *(at short notice)*

An equivalent IGT UNC Modification will need to be raised and it would be beneficial for these Modifications to be developed at one Workgroup

Any questions?

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1 Summary

What

The Performance Assurance Framework Administrator (PAFA) is already entitled to data under UNC for the purposes of conducting the functions ascribed to the PAFA by the Performance Assurance Framework (PAF) document but are not currently specified as a User Type within the Data Permissions Matrix (DPM).

Modification 0649S – "Update to UNC to formalise the Data Permission Matrix" 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 (DSC CoMC).

Why

In line with UNC Legal Text implemented for 0649S a new Modification is needed to add a new User type to the DPM, regardless of if they are already specified under UNC Section V.

PAFA are currently entitled to access Protected Information as reasonably required for the purpose of performing functions under the PAF Contract. Adding PAFA to the DPM will, subject to DSC CoMC approval, facilitate release of data over and above what is currently defined in the Performance Administrator Report Register.

How

This enabling Modification is proposing to add the PAFA as a new User type to the DPM.

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 does not discriminate between code parties. The Modification is to enable data sharing permissions only and therefore an administrative enabler only.

An IGT UNC Modification has been raised, (IGT136), to ensure that the amendment to the DPM being proposed in this proposal is similarly being proposed through IGT UNC governance to ensure consistency between the codes when the change is applied in the DSC.

The Workgroup has considered the rationale for self-governance and agrees that the reasoning still applies.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to self-governance
- be assessed by a Joint UNC/IGT Workgroup.
- NOTE the proposals are being reviewed by separate workgroups although coordination between UNC & IGT UNC Code administrators is in operation

3 Why Change?

This change is proposed to add PAFA as a new User type to the DPM in line with the requirements set out in Modification 0649S. This will then enable a request for the disclosure of specific data to be submitted to the DSC CoMC for approval, where needed, to enable the PAFA to access additional data than is currently specifically available via the reports defined in the PARR. Provision of this additional data will enable the PAFA to better understand context of the output reports described in the Performance Assurance Reports Register, and therefore refine actions needed and ensure that they can engage fully with the relevant User to understand the impacts and reasons for failures and assess the efficacy of the reports.

The Performance Assurance Committee has specifically requested that the inclusion of the PAFA in the DPM is expediated so that additional information is available to the PAFA prior to implementation of UNC Modification 0697 - Alignment of the UNC TPD Section V5 and the Data Permissions Matrix.

It is anticipated that, following approval of this Modification, the data made available to the PAFA will be **initially** limited to the individual data items that are used to create the summary reports that form the existing PARR. This is for information only as this will be subject to approval by the DSC Contract Management Committee.

4 Code Specific Matters

Reference Documents

Link to: Performance Assurance Report Register

Link to: Disclosure Request Report for PAFA to get access to data under the DDP

Knowledge/Skills

None identified.

5 Solution

This enabling Modification is proposing to add the PAFA as a new User type to the DPM.

6 Impacts & Other Considerations

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

None.

Consumer Impacts

None directly identified, this is a permissions Modification to permit the release of data that may lead to benefits to the consumer.

Consumer Impact Assessment	
Criteria	**Extent of Impact**
Which Consumer groups are affected?	Data relating to all consumers groups would be available to the PAFA
What costs or benefits will pass through to them?	Improved access to market data by PAFA supports a robust assurance framework which brings more confidence to the market. It is not anticipated that any additional costs would result from this change
When will these costs/benefits impact upon consumers?	Benefits should start to accrue once full implementation, (DDP fully operational), has occurred.
Are there any other Consumer Impacts?	PAFA would have more granular level of data to support its market assurance role.
General Market Assumptions as at December 2016 *(to underpin the Costs analysis)*	
Number of Domestic consumers	*21 million*
Number of non-domestic consumers <73,200 kWh/annum	*500,000*
Number of consumers between 73,200 and 732,000 kWh/annum	*250,000*
Number of very large consumers >732,000 kWh/annum	*26,000*

Cross Code Impacts

An equivalent IGT UNC Modification has been raised – (IGT136).

EU Code Impacts

None.

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 requested.

Workgroup Impact Assessment

The Workgroup has only been meeting since November, (2 meetings), and, given the relatively minor amendment being proposed to documentation, the view of the workgroup is that the Workgroup Report can be finalised and submitted to the Modification Panel in February.

The principle point of discussion centred on why PAFA should be added to the DPM, to which the answer was that, while PARR reporting provided industry wide and shipper specific performance information, to obtain full value from the reports and to better understand that some of the data that comprises the reports at a granular level, would be useful to allow the PAFA to exploit the functionality offered by the Data Discovery Platform, (DDP), to provide bespoke reporting with greater informational granularity.

For information: the DDP is a [self-service reporting tool that can be used by an authorised user to obtain bespoke reports by querying a pre-agreed list of data items]

It was the Workgroups view that permitting the PAFA access to data at meter point level should provide this extra layer of information and allow the PAFA to better fulfil its role.

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 change is to add Performance Assurance Framework Administrator to the Data Permissions Matrix. This Modification provides a more efficient means of creating bespoke permissions for the PAFA than by modifying the main body of UNC and would enable additional data to be released on a case by case basis to support the objectives of the Performance Assurance Framework. This Modification also 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.

Given the implementation of the proposal crosses three discrete agreements, it is the Workgroups view that it would be helpful to set out the steps required to establish contiguous & continuous governance and provide uninterrupted access to the suite of reports necessary for the PAFA to fulfil its role.

The proposal seeks to include the PAFA as user type in the DPM and the delivery mechanism for this user type would be the Data Discovery Platform.

As part of that inclusion, all the data items currently processed and available to the PAFA as part of the PARR reporting pack would continue to be available by way of a DSC acknowledgement that PARR reporting pack would be used as the base-line to initially establish PAFA's data access permissions. This can be evidenced from the separate, parallel piece of work being undertaken by the CDSP under DSC governance, (see Data Disclosure Request: PAFA (link listed in Section 4)), whereby all the PARR reports have been decompiled into a list of data items and these will be transposed into the column on the DPM relevant to PAFA.

This will provide continuity of service for the PARR reporting pack, and once the DDP is fully operational, would also allow the PAFA to develop new reports based on the data items it has permission to view.

These discrete steps in relation to the data access are required, given that the IGT UNC and UNC proposals both need to be implemented before the DDP could be used to access the data granted by way of DSC data permissions matrix.

Additional PARR reports could still be created through UNCC governance and subsequently passed to the DSC for decomplication and inclusion in the DPM list of data items, although the exact UNC governance route for requesting may change over time as this is currently under review as part of Modification Proposal 0674 (*Performance Assurance Techniques and Controls*)

9 Legal Text

This Modification Proposal has been raised in accordance with 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, Performance Assurance Framework Administrator (PAFA)

For reference: TPD Section V5.5.2(j) states:

> "*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.*"

2	**Data Permissions Matrix**		Portfolio reporting by various means e.g. email, shared area etc			
3	* indicates conditionality reference in Data Permission Matrix Conditionality document published alongside this DPM		Supplier	MAM	MEU*	AltHANCo*
4	DATA TYPE	DATA ITEM	PORTFOLIO	Portfolio (DES vie	Portfoli	COMMUNI
5	Supply Meter Point Information	Meter Point Reference Number	Yes	Yes	Yes	Yes
6	Supply Meter Point Information	LSP	Yes	Yes	Yes	No
7	Supply Meter Point Information	Address	Yes	Yes	Yes	Yes
8	Supply Meter Point Information	Postcode	Yes	Yes	Yes	Yes
9	Supply Meter Point Information	Network Name	Yes	Yes	Yes	No
10	Supply Meter Point Information	Network Short Code	Yes	Yes	Yes	No
11	Supply Meter Point Information	SMP Status	Yes	Yes	Yes	No
12	Supply Meter Point Information	Current Shipper	Yes	No	Yes	No
13	Supply Meter Point Information	Current Shipper Short Code	Yes	No	Yes	No
14	Supply Meter Point Information	Current Supplier	Yes	Yes	Yes	No
15	Supply Meter Point Information	Current Supplier Short Code	Yes	Yes	Yes	No

10 Consultation

Panel invited representations from interested parties on 20 February 2020. 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 3 representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
Northern Gas Networks	Support	f) - positive	• Supports this proposal and agrees the addition of the Performance Assurance Framework Administrator (PAFA) to the Data Permissions Matrix (DPM) would allow for easier changes to the data items being provided. • Appreciates this is, subject to Contract Management Committee approval, should the items be required for performing activities under the Performance Assurance Framework (PAF) Contract change. • Believes this would further Relevant Objective f) the promotion of efficiency in the implementation and administration of the Code because the addition of the PAFA to the DPM is more efficient than creating bespoke permissions for data access. • Agrees with the Self-Governance status as it only seeks to add the PAFA to the DPM and proposes no changes to the UNC or party obligations, systems or processes • Supports the implementation timescale of 16 business days after Modification Panel approval. • Believes no analysis or development is required and no ongoing costs incurred as a result of this proposal. • Understands there is no legal text required as no changes to the UNC are needed for this proposal due to the PAFA

			already being listed within TPD V5. • Appreciates the only change required is to add a new portfolio column for the PAFA within the Data Permissions Matrix giving them a view of data at meter point level.
Shell Energy Retail	Support	f) – positive	• Supports this Modification as understands it will enable the Performance Assurance Framework Administrator (PAFA) to access more granular data (subject to approval by the Contract Management Committee) beyond what is currently allowed within the Performance Assurance Report Register. • Understands that this proposal is purely an enabling Modification to include PAFA in the Data Permissions Matrix and does not propose any changes to the UNC. • Agrees with the implementation timeline.
SGN	Support	f) – positive	• Supports this Modification as it will facilitate the inclusion of the PAFA as a "User Type" within the Data Permissions Matrix (DPM). • Supports this Modification as it will enable the current incumbent, and any subsequent incumbents to the role of PAFA to access data via the DPM and the DSC Contract Committee process implemented under Modification 0649S • Agrees with the self-governance status • Agrees with the implementation timeline • Concurs that no Legal Text would be required for implementation

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

12 Recommendations

Panel Determination

Members agreed:

- that Modification 0707S should [not] be implemented.