

UNC Modification	At what stage is this document in the process?
<h1>UNC 0697:</h1> <p><del>Further Realising the Benefit of the Data Permissions Matrix and UNC Consistency Review</del> <u>Alignment of the UNC TPD Section V 5 and the Data Permissions Matrix</u></p>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #28a745; color: white; padding: 2px; display: flex; align-items: center; justify-content: center;">01 Modification</div> <div style="border: 1px solid #17a2b8; padding: 2px; display: flex; align-items: center; justify-content: center;">02 Workgroup Report</div> <div style="border: 1px solid #9932cc; padding: 2px; display: flex; align-items: center; justify-content: center;">03 Draft Modification Report</div> <div style="border: 1px solid #ffc107; padding: 2px; display: flex; align-items: center; justify-content: center;">04 Final Modification Report</div> </div>
<p><b>Purpose of Modification:</b></p> <p>This <del>m</del>Modification seeks to <del>rationalise further realise the benefit of the Data Permissions Matrix reflecting the direction to greater data openness and to rationalise</del> 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"> <li>subject to self-governance</li> <li>assessed by a cross code UNC/IGT UNC Workgroup</li> </ul> <p>This modification will be presented by the Proposer to the Panel on <del>18th July</del> <u>19th September 2019</u>. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>
	<p>High Impact: None</p>
	<p>Medium Impact: None</p>
	<p>Low Impact: Transporters, Shipper Users, CDSP</p>

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Timetable		Transporter: <del>Cadent</del> <u>Insert name</u>	
<b>The Proposer recommends the following timetable:</b>		 <a href="mailto:Gurvinder.Dosanji@cadentgas.com">Gurvinder.Dosanji@cadentgas.com</a>	
Initial consideration by Workgroup	<del>25</del> <u>6</u> July <del>September</del> 2019	 <a href="mailto:Gurvinder.Dosanji@cadentgas.com">Gurvinder.Dosanji@cadentgas.com</a>	
Workgroup Report presented to Panel	<del>16</del> <u>7</u> October <del>January</del> 2019 <del>20</del>	 <del>0773</del> <u>151572</u> telephone	
Draft Modification Report issued for consultation	<del>17</del> <u>6</u> October <del>January</del> 2019 <del>20</del>	Systems Provider: Xoserve	
Consultation Close-out for representations	<del>07</del> <u>7</u> November <del>February</del> 2019 <del>20</del>	 <a href="mailto:UKLink@xoserve.com">UKLink@xoserve.com</a>	
Final Modification Report available for Panel	<del>14</del> <u>0</u> November <del>February</del> 2019 <del>20</del>		
Modification Panel decision	<del>24</del> <u>0</u> November <del>February</del> 2019 <del>20</del>		
[I have assumed 3 months development as it has not been specified?]			
An equivalent modification <del>has been</del> <u>will be</u> raised for the IGT UNC, it would be beneficial for the two Modifications to be developed at one workgroup.			

## 1 Summary

### What

~~Making the current governance framework more efficient will support the drive towards greater openness whilst maintaining appropriate control. This modification seeks to strike the balance by maximising the benefit of existing governance processes.~~

~~Introduction of the 'Research Body' seeks to support the direction described in the objectives of the Energy Data Taskforce of promoting innovation, operational excellence and efficiency in the UK Energy Industry where the relevant party can demonstrate that their research will benefit consumers, business, government or society.~~

~~UNC Modification 0649S introduced the **Data Permissions Matrix (DPM)** to reduce the administration necessary to release data to relevant parties. When this modification was implemented the fundamental review of the existing Protected Information aspects of the UNC was not conducted so as a consequence this part of the UNC is inconsistent. To ensure consistency across UNC TPD Section V5 drafting such that the UNC describes the parties entitled to access data, rather than the data items themselves. In parallel, the DPM will be updated to remove the services (mechanism) around how the data is shared to each market participant type (user). Removal of the services from the Data Permissions MatrixThis will eliminate the need for DSC Contract Management Committees to approve release of a data item via other 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. ~~When this modification was implemented the fundamental review of the existing Protected Information aspects of the UNC was not conducted so as a consequence this part of the UNC is inconsistent. To ensure consistency across UNC TPD Section V5 drafting such that the UNC describes the parties entitled to access data, rather than the data items themselves.~~~~

### Why

~~Making theis change will ensure consistency between the UNC and the DPM; it will make it clear in the UNC which user has access to data and any specific criteria User types must meet to gain access to data e.g. separate confidentiality agreements. The DPM will clearly detail the data items each user stated within the UNC TPD Section V5 can have access to.~~

~~This will prevent misalignment between the UNC TPD Section V5 and the DPM whilst making it explicit who can have access to data.~~

~~current governance framework more efficient will support the drive towards greater openness whilst maintaining appropriate control. This modification seeks to strike the balance by maximising the benefit of existing governance processes.~~

### How

~~This modification proposes to ensure consistency across UNC TPD Section V5 drafting and the **Data Permissions Matrix**~~DPM~~.~~

~~. It seeks to remove from UNC reference to the actual data items users have access to and simply detail the users. Where certain conditions are explicitly stated for a user to gain access to data, these will be rationalised by removing the detail from UNC and including this within the Operating Guidelines Document – Data Permission Matrix Conditionality against the relevant User. This document details any additional conditionality~~

that is not set out in the DPM which is relevant to the service provision and can be found on Xoserve.com via the following link.

It proposes to add any parties referenced in the DPM that are not currently referenced in UNC TPD Section V5.

It also proposes to add the parties currently referenced in UNC TPD Section V5 who are not detailed within the DPM as a user type.

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.

It proposes to add the new user type of 'Research Body' along with any parties referenced in the Data Permissions Matrix that are not currently referenced in UNC TPD Section V5 such as Authorised Agency Users and Major Energy Users. It further proposes to rationalise referencing to other conditions of access specific to users by setting criteria where a special condition for access is required for example a separate confidentiality agreement.

## 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.

It is expected that equivalent changes are necessary to the IGT UNC, so it is recommended that the IGT UNC modification (tbc) follow 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 Data Permission Matrix DPM within the UNC. The Data Permission Matrix DPM was intended to describe the Protected Information data items that each market role type is entitled to receive and also to reduce the governance burden on a data service user once a use case had been established by that user.

The Energy Data Taskforce has signalled the intent that data should be 'presumed open' therefore this modification proposes that the **Data Permissions Matrix** includes an additional user type of [~~relevant Research Body~~]. A [~~relevant Research Body~~] would be an organisation that requires access to information [~~Data~~] for the purposes of promoting innovation, operational excellence and efficiency<sup>4</sup> in the UK Energy Industry that will benefit consumers, business, government and society as a whole. This modification proposes that requests for access to such **Data** are subject to Industry review which will test the research proposals against these objectives, and consider the relevant measures that will be required to mitigate any risk of sharing data with a relevant Research Body e.g. 'aggregation / anonymisation of data'.

Modification 0649S did not fully review existing UNC TPD Section V 5 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 ~~Data Permission Matrix~~**DPM**.

A number of entities specified in UNC TPD Section V 5 'Information and Confidentiality' are not all currently referenced in the ~~Data Permissions Matrix~~**DPM** because the DPM was originally created to only describe of data via a specific service. ~~It~~ this modification is looking to reference these within the ~~Data Permissions Matrix~~**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)
- Performance Assurance Framework Administrator (PAFA)
- Data Communications Company (DCC)

It also proposes to add any parties referenced in the Data Permissions Matrix that are not currently referenced in UNC TPD Section V5 such as Authorised Agency Users and Major Energy Users.

-This modification also looks to rationalise UNC TPD Section V so that the data available is specified in the ~~Data Permissions Matrix~~**DPM**, rather than the UNC itself.

The Data Permissions Matrix 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 Contract Management Committee. 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)

<sup>4</sup>as described in 'A Strategy for a Modern Digitalised Energy System -- Energy Data Taskforce report' BEIS 2019.

## 5 Solution

This modification proposes to ensure consistency across UNC TPD Section V5 drafting and the **Data Permissions Matrix** such that the UNC describes the user types entitled to access data, rather than the data items themselves. This will involve the removal of references in the UNC to the actual data items users have access to and simply detail the users. This will also require additional user types to be added to the UNC who are currently detailed within the DPM but not within UNC TPD Section V5. These users are:

- Authorised Agency Users
- Major Energy Users

As well as adding users to the UNC, users who are currently detailed within the UNC but not in the DPM will need to be added to the DPM. These are:

- Energy Theft Tip-Off Service (ETTOS)
- Theft Risk Assessment Service (TRAS)
- Performance Assurance Framework Administrator (PAFA)
- Data Communications Company (DCC)

It further proposes to rationalise referencing to other conditions of access specific to users by setting criteria where a special condition for access is required for example a separate confidentiality agreement and describing this in detail within the Operating Guidelines DPM Conditionality.

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 DSC Contract Management to approve another service. With this logic, an existing user who already has access to data will not require additional Committee approval to receive the same data in a different format via an alternative mechanism. To confirm, the DPM will still have a Portfolio and Community view for each user and detail the data they are able to access but no other conditions such as the mechanism to access data will be described.

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.

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.

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This will require additional user types to be added to the UNC. It further proposes to rationalise referencing to other conditions of access specific to users by setting criteria where a special condition for access is required for example a separate confidentiality agreement.

It further proposes to add the new user type of 'Research Body' along with any parties referenced in the Data Permissions Matrix that are not currently referenced in UNC TPD Section V5.

'Research Body' means an organisation that requires access to relevant [Data] for the purposes of promoting innovation, operational excellence and efficiency in the UK Energy Industry that will benefit consumers, business, government or society as a whole.

~~Where a party submits a data access request as a Research Body it is proposed that they submit a **Research Summary** describing the objectives of the research, the data items necessary and the anticipated benefits that they are expecting to demonstrate and the parties who will benefit and how they will ensure compliance with the relevant Data Protection regulations. It is proposed that a review process would be conducted to confirm whether data can be provided, and consider the relevant measures that will be required to mitigate any risk of sharing data with a relevant Research Body e.g. aggregation / anonymisation of data. It is proposed that the review of the **Research Summary** will be conducted as a process reporting to the **DSC Contract Management Committee**.~~

## 6 Impacts & Other Considerations

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

~~Recommendations within this modification support the objectives of 'A Strategy for a Modern Digitalised Energy System – Energy Data Taskforce report' BEIS 2019. This is not subject to a SCR.~~

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

~~The inclusion of a user type of 'Research Body' within the Data Permissions Matrix is intended to facilitate release of data where it can be demonstrated by such users that it is to the Consumer's benefit~~

#### Cross Code Impacts

A modification is required to 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	None

(ii) the pipe-line system of one or more other relevant gas transporters.	
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 [Data-Permission-MatrixDPM](#) and removing reference to specific data items within UNC which are now covered under the [Data-Permissions-MatrixDPM](#) 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

**Joint Office** of Gas Transporters

- Refer this Modification to a cross code Workgroup for assessment.