

UNC Modification	At what stage is this document in the process?
<h1>UNC 0697:</h1> <h2>Further Realising the Benefit of the Data Permissions Matrix and UNC Consistency Review</h2>	<div style="display: flex; flex-direction: column; align-items: flex-start;"> <div style="border: 1px solid green; border-radius: 5px; padding: 5px; margin-bottom: 5px; width: 100%;">01 Modification</div> <div style="border: 1px solid blue; border-radius: 5px; padding: 5px; margin-bottom: 5px; width: 100%;">02 Workgroup Report</div> <div style="border: 1px solid purple; border-radius: 5px; padding: 5px; margin-bottom: 5px; width: 100%;">03 Draft Modification Report</div> <div style="border: 1px solid orange; border-radius: 5px; padding: 5px; width: 100%;">04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>This Modification seeks to further realise the benefit of the Data Permissions Matrix reflecting the direction to greater data openness and 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-governance • assessed by a cross code UNC/IGT UNC Workgroup <p>This modification will be presented by the Proposer to the Panel on 18 July 2019. 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	
The Proposer recommends the following timetable:	
Initial consideration by Workgroup	25 July 2019
Workgroup Report presented to Panel	17 October 2019
Draft Modification Report issued for consultation	17 October 2019
Consultation Close-out for representations	07 November 2019
Final Modification Report available for Panel	11 November 2019
Modification Panel decision	21 November 2019
An equivalent modification has been raised for the IGT UNC; it would be beneficial for the two Modifications to be developed at one workgroup.	

 Any questions?

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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** to reduce the administration necessary to release data to relevant parties. Removal of the services from the Data Permissions Matrix will eliminate the need for DSC Contract Managers to approve release of a data item via other services. 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 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.

How

This modification proposes to ensure consistency across UNC TPD Section V5 drafting and the Data Permissions Matrix. 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 within the UNC. The Data Permission Matrix 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 efficiency¹ 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.

A number of entities specified in UNC TPD Section V 5 ‘Information and Confidentiality’ are not all currently referenced in the Data Permissions Matrix, this modification is looking to reference these within the Data Permissions Matrix to ensure both are aligned. This modification also looks to rationalise UNC TPD Section V so that the data available is specified in the Data Permissions Matrix, 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.

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)

¹ 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 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

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 (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 Data Permission Matrix and removing reference to specific data items within UNC which are now covered under the Data Permissions Matrix 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.