

Disclosure Request Report

National Gas Transmission (NGT) access to data to support and run Demand Side Response (DSR) process

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Submitted for:	Approval
Decision details:	CoMC is requested to approve the release of data to NGT who will be supporting the management of the DSR process
Date:	16 th August 2023
DRR Reference:	DRR – Aug-23-01

1. Introduction and background

Modifications [0844](#) and [0845](#) have been raised to expand the scope of the Demand Side Response (DSR) arrangements to enable the establishment of direct contractual arrangements between National Gas Transmission (NGT) and individual Consumers for the voluntary reduction of their gas demand (0844), and to amend the existing DSR arrangements that can be entered between NGT and Shipper User (0845). These changes are also raised in the IGT Code under Modification IGT167.

For the avoidance of doubt, Modification 0844 and 0845 have been **approved by Ofgem on the 04 August and implemented on 07 August**.

To allow NGT to sufficiently manage the DSR process which enables management of the total gas network, NGT require certain data for both DNO and IGT sites.

The data required can be split into 4 main areas associated to the DSR process:

- a) Communications to promote the process and encourage DSR options being offered;
- b) Preparations for DSR offers to be made to enable NGT to assess offers within restricted timelines;
- c) *Validation of DSR offers to allow NGT to assess and confirm if they can be accepted;*
- d) *Assessment of accepted offers being exercised, to ensure NGT can confirm if the relevant action was taken by the site.*

For the avoidance of doubt, within the tendering document for the DSR offer, the tendering party (can be a Shipper User or Consumer), will be asked to acknowledge that NGT shall obtain certain data in respect to the relevant site such as consumption data (i.e points c) and d) above). Based on this, the request to release data under this **DRR only applies to points a and b**. This is because the data requested is for Class 1 and 2 sites, not just for sites which have made a DSR offer and therefore acknowledged the requirement to share data.

When determining the route to approve the release of data, we believe the DSC CoMC via this DRR is most appropriate, as although the data items could be considered retail data, due to the scale in which this process applies (i.e. total GB gas network), we believe it should be considered wholesale.

As you are aware the Data Permissions Matrix (DPM) has been amended to remove 'portfolio' view for DSC parties. The treatment of NGT within the DPM is silent. As mentioned the DSR process is relevant

across the whole GB gas network therefore could be considered as 'Total System'. This principle has not been established to date, but the DPM does not seek to control portfolio data, however in this instance, it seems relevant to record the release of data to NGT.

2. Data Items

This DRR is proposing to release the following data to NGT:

a) Data to issue DSR communications:

- For Class 1 and 2 sites (excluding those with a Domestic Market Sector Code and with less than a certain usage):
 - MPRN
 - Address
 - Company name (Consumer Name) (if available)

b) Data to prepare for DSR bid assessment:

- For Class 1 and 2 sites (excluding those with a Domestic Market Sector Code and with less than a certain usage):
 - Daily demand in kWh during the previous Winter Period (01 November - 30 April) - this will be the allocations for the Gemini meter ID for the period for all Class 1 sites and the daily consumption for Class 2 sites.

Details on c and d have been provided below for completeness, however as mentioned, this DRR is not seeking to request the release data under these headings.

c) Data to check DSR bids:

- *For any DSR bid provided by a Shipper or Consumer:*
 - *NGT to provide MPRN and Consumer name (for 0844) to the CDSP, to receive back:*
 - *Consumer site Class*
 - *For 0844, the Consumer name held in UK Link for NGT to assess if this aligns with the name provided to NGT*
 - *The Gemini meter ID associated to the MPRN*
 - *In the event of a multi-year offer, NGT will require consumption to be provided in May following the Winter Period that has just passed*
 - *Confirmation if the consumer is a Shared Supply Meter Point (SSMP)*

d) Data to assess DSR turn down (if DSR option is exercised):

- *Consumption data for sites, which have opted to provide demand response (turn down), to confirm they have indeed turned down if this option is exercised, where this is contracted directly with the consumer and exercised within day. This could be hourly consumption data where available.*

3. Privacy Impact Assessment

Where the disclosure of information includes the processing of personal data a Privacy Impact Assessment may be required.

Xoserve has considered the various tests that may be applied and considers that none of these are met and so a Privacy Impact Assessment is not required.

The tests (and answers) applied in determining whether a Privacy Impact Assessment was required were:

- a) Will the project involve the collection of new information about individuals?
No
- b) Will the project compel individuals to provide information about themselves?
No
- c) Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
No – Please note assessment will be undertaken to remove individuals (Domestic and AQ threshold assessment)
- d) Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
No – Please note assessment will be undertaken to remove individuals (Domestic and AQ threshold assessment)
- e) Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.
No
- f) Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?
No
- g) Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.
No
- h) Will the project require you to contact individuals in ways that they may find intrusive?
No
- i) Will the disclosure of information utilise new technology for Xoserve?
No
- j) Will the disclosure include information that identifies a vulnerable customer?
No
- k) Will the disclosure release mass data to a party?
No – Please note assessment will be undertaken to remove individuals (Domestic and AQ threshold assessment)
- l) Will the disclosure include information that identifies an occurrence of theft of gas.
No
- m) Will the disclosure require a fundamental change to Xoserve business
No

4. Commercial model

The request for data is from an existing DSC Customer (NGT), therefore we expect new DSC Service Lines to be added which cover the DSR process and data requirements.

5. Method of access to the Dataset

The method of data transfer is to be confirmed.

6. CoMC Determinations

CoMC is requested to approve this Disclosure Request Report

7. Appendixes

Please see section below

Appendix 1: Current Data Permissions Matrix with proposed changes as per this Disclosure Request Report

An updated DPM (if required) will be provided post CoMC decision on the DRR.

Appendix 2: Current DPM – Conditionality Document with proposed changes as per this Disclosure Request Report

We do not believe this DRR requires any change to the DPM Conditionality Document as it does not involve the release of data to a new User type or introduce any new conditions.