

Representation - Draft Modification Report UNC 0649S

Update to UNC to formalise the Data Permissions Matrix

Responses invited by: 5pm on 11 October 2017

To: enquiries@gasgovernance.co.uk

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	11 th October 2018
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

This change is sensible change following FGO. It is required because Xoserve is now recognised as an organisation in its own right rather than as an agent of the Transporters and Xoserve's role and responsibilities as Central Services Data Provider (CDSP) in release of data to non-Code party's needs to be explicitly recognised. The general permission for specified non-Code organisations to receive Protected Data will remain in the UNC. The key change in this proposal is that it will move the detail of the data items which may be released to non-Code parties to the Data Services Contract (DSC). Transporters, IGTs, Shippers and the CDSP are all parties to the DSC and therefore this is the appropriate contract to contain this detail. The CDSP is the party that actually controls release of the data and so it will be bound by the DSC provisions on data security.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

Although the proposal will have a positive impact on the administration of the Code it will not be material as this change will have a small overall impact. Therefore self-governance is justified.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

This can be implemented 16 days following a Panel determination to implement

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

None

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No

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

No