













UNC Final Modification Report		At what stage is this document in the process?
<h1>UNC 0649S:</h1> <h2>Update to UNC to formalise the Data Permissions Matrix</h2>		<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p>Purpose of Modification:</p> <p>This Modification seeks to formalise the Data Permissions Matrix within the Uniform Network Code (UNC) and set out the process for amending the data access permissions in the future.</p>		
	Panel consideration is due on 18 October 2018 (<i>at short notice by prior agreement</i>)	
	High Impact: None	
	Medium Impact: None	
	Low Impact: CDSP, Shippers and Transporters	

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Timetable		 Any questions?
Modification timetable:		Contact: Joint Office of Gas Transporters
Initial consideration by Workgroup		 enquiries@gasgovernance.co.uk
Amended Modification considered by Workgroup		 0121 288 2107
Workgroup Report presented to Panel		Proposer: Steve Mulinganie Gazprom
Draft Modification Report issued for consultation		 steve.mulinganie@gazprom-energy.com
Consultation Close-out for representations		 07590 245256
Final Modification Report available for Panel		Transporter: Cadent
Modification Panel decision		 chris.warner@cadentgas.com
		 01926 653541
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1 Summary

What

Currently the data that can be accessed within the Data Enquiry Service (DES) by User and User access type is illustrated within the DES Permissions Matrix which forms part of the UK Link Manual. This Modification seeks to formalise the matrix within the Uniform Network Code (UNC) and extend it to include other request / respond services and to set out the process to amend the data field and/or the data access permissions where required.

Why

The DES Permissions Matrix details the User groups who can access DES and the data fields they have permission to view. This was incorporated into the UK Link Manual following the UK Link Manual review. This was approved by the Data Services Contract (DSC) Change Management Committee and is available for Users to view within the UK Link SharePoint site.

This Modification has been raised to formalise the Data Enquiry Service arrangements and extend them to include other request / respond services where data is provided such as the Application Programmable Interfaces (APIs) and the telephone service. This Modification seeks to reference the Data Permissions Matrix (which will incorporate the existing DES Permissions Matrix) within UNC TPD Section V. This modification also details how this Data Permissions Matrix can be updated to add or amend the data field and/or permissions users can access within the data services within the scope of the Data Permissions Matrix.

How

This Modification seeks to formalise the Data Permissions Matrix within the UNC.

The solution is an update to UNC TPD Section V5.5 (Exceptions), to permit the release of data in line with the Data Permissions Matrix. It is proposed that the DSC Contract Management Committee as described within GT D – CDSP and UK Link – is utilised to approve proposals brought by the CDSP to amend the data fields and/or permissions against each service.

2 Governance

Justification for Self-Governance

Panel determined the Modification is unlikely to have a material effect on the promotion of efficiency in the implementation and administration of the Code or the securing of effective competition, as merely seeks to formalise the DES Permissions Matrix within the UNC and stipulate the process for amending the data fields and/or permissions going forward. It proposes to extend the services included within this to describe other services where data is made available to Users. This will in effect create a multi service Data Permissions Matrix.

This requires an addition to the text in UNC TPD Section V5.5 to permit the release of data in line with the Data Permissions Matrix which is part of the UK Link Manual. Assessment of changes with respect to the role of the Contract Management Committee may lead to consequential changes in General Terms D – CDSP and UK Link.

As a result, it is unlikely to have a material impact

There is no impact on any of the other Self-Governance criteria.

As such, this is a non-material change to the UNC to formalise the existing DES Permissions Matrix and incorporate additional services into the Data Permissions Matrix.

Modification 0649S will therefore follow self-governance procedures.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to self-governance
- proceed to Consultation

The Workgroup agree with the Panels view on self-governance for the reasons above and consider this Modification is sufficiently developed to proceed to consultation.

3 Why Change?

Modification 0613S – *Revised UK Link Manual CDSP Data Services Document* was implemented on 13 October 2017. This Modification created the UK Link Manual as part of the DSC. Following approval at the DSC Change Management Committee (ChMC) meeting in January 2018, the DES Permissions Matrix was incorporated into the UK Link Manual and can be viewed through the UK Link SharePoint site.

The DES Permissions Matrix details the parties who can access DES and the data fields they have permission to see by User view type.

Since the creation of the DES Permissions Matrix within the UK Link Manual the API capability has been developed which enables users of the service to request specific agreed data items via this service. The data items within this service are also considered as Protected Data where provided outside of a portfolio view therefore would be subject to a UNC Modification to amend UNC TPD Section V5.5 to identify this as an Exclusion. This process has been necessary for UNC Modifications 0593 and 0640S to release data to Price Comparison Websites and Third Party Intermediaries, and to Suppliers respectively. A number of use cases have been identified within the Joint Market Information Service (MIS) Development Group (JMDG) as near term API services that users have identified as required which would be expected to materialise as UNC Modifications were this modification to be not implemented.]

By expanding the services that are included within this Data Permissions Matrix then greater flexibility and responsiveness could be achieved for services that would be expected to be quicker to market for data provision services to users and therefore realise benefits sooner.

It is also proposed that the data items included within the telephone services offered are also included within the Data Permissions Matrix for this same reason.

Through the formalisation of the Data Permissions Matrix within the UNC, it will permit the release of data in line with the matrix. This Modification proposes that the DSC Contract Management Committee approve amendments to the Data Permissions Matrix such as adding new data items to the matrix, and defining which services and parties that these items are available to. This Modification will improve the efficiency of data governance by reducing the need for UNC Modifications, but it is expected that the DSC Contract Managers may still consider that a UNC Modification is relevant.

For the avoidance of doubt, any new User type not currently referenced within the Data Permissions Matrix as a current User type e.g. Supplier, Price Comparison Website etc. will require a UNC Modification to add the new User. This will be the case on all occasions where a new User type seeks access.

4 Code Specific Matters

Reference Documents

UK Link Change Pack – communication 1816.1 – IM – SN – Data Enquiry Service Permissions Matrix

Knowledge/Skills

No knowledge or skills are necessary.

5 Solution

This amendment would formalise the arrangement to permit the CDSP to release data in line with the Data Permissions Matrix.

UNC TPD Section V5.5 (Exceptions) is to be amended to formalise the Data Permissions Matrix and a new clause be included within V 5.5.2 to allow the CDSP to release data to parties in line with the Data Permissions Matrix.

Amendment to GT-D is proposed to include the Data Permissions Matrix as a component part of the UK Link Manual.

Since it is proposed that the DSC Contract Management Committee provide approval for release of data items to the relevant party, the DSC Change Management Procedures should reference an instruction from Contract Managers to update the Data Permissions Matrix.

In exceptional cases, the DSC Contract Management Committee may still wish to utilise the Modification process in order to ensure visibility of changes to industry participants.

For the avoidance of doubt, any new User type not currently referenced within the Data Permissions Matrix as a current User type e.g. Supplier, Price Comparison Website etc. will require a UNC Modification to add the new User. This will be the case on all occasions where a new User type seeks access.

6 Impacts & Other Considerations

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

No impacts identified.

Consumer Impacts

Consumer Impact Assessment	
Criteria	Extent of Impact
Which Consumer groups are affected?	<ul style="list-style-type: none"> No direct impacts.
What costs or benefits will pass through to them?	As this Modification is providing permissions for the release of data under specific scenarios. No additional costs should pass through to consumers should this Modification be implemented.
When will these costs/benefits impact upon consumers?	Not applicable.
Are there any other Consumer Impacts?	No direct consumer impacts have been identified. However, the release of data might be considered to benefit consumers where this for example supports faster or more reliable switching.

Cross Code Impacts

This Modification would directly impact IGT UNC and a joint Workgroup was been established which included the assessment of IGT115 - Update to IGT UNC to formalise the Data Permissions Matrix.

EU Code Impacts

None identified.

Central Systems Impacts

As this Modification is providing permission for the release of data, there would be no central systems impacts should this Modification be implemented and therefore no associated systems costs.

Workgroup Impact Assessment

The Workgroup notes that this Modification establishes a process for managing the permissions required to release data subject to oversight by the relevant DSC Committees.

This should allow for a more responsive decision-making process for the management of permissions to release data and remove the need to raise future permissions based UNC Modifications, unless there is a material need to do so.

Some participants noted that while this Modification establishes a general principle for permission to release data in UNC TPD Section V, this might cause conflicts with current clauses in Section V which identifies the release of specific data items in specific circumstances and careful review of the Legal Text should ensure potential conflicts are removed.

The Workgroup notes that should this Modification be implemented, it is likely to lead to the withdrawal of UNC Modification 0663S - Extending the data comprised under the definition of Supply Point Premises Data (TPD V5.18.1) as it would be superfluous.

The Workgroup noted that the Legal Text provided references instruction to the CDSP to change the Data Matrix by instruction from Contract Managers. However, it is suggested that the term DSC Contract Management Committee is used as this would be consistent and would prevent possible confusion that a DSC Contract Manager could instruct a change in isolation.

Rough Order of Magnitude (ROM) Assessment

Not required.

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 Modification Proposal should have a positive impact on relevant objective f) Promotion of efficiency in the implementation and administration of the Code, as it formalises the permissions for the release of data and sets out the process in which these can be amended. In addition, it would reduce the need to raise UNC Modifications to provide permission to release data where this would be of a non-material nature, making the process more responsive and efficient.

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.

The Workgroup notes that changes to IGT UNC are managed through releases and should this Modification and IGT Modification 115 be approved for implementation, it would be beneficial if the implementation dates were aligned, which might require a special release for IGT Modification 115.

9 Legal Text

Legal Text has been provided by Cadent and is published alongside this report. The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution subject to consideration of:

1. That the proposed changes to UNC TPD Section V do not cause conflicts or extend the existing permissions or exemptions set out in Section V.
2. Reference to Contract Managers is replaced with DSC Contract Management Committee.

Recommendations

10 Consultation

Panel invited representations from interested parties on 20 September 2019. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Of the 7 representations received 4 supported implementation and 3 offered qualified support.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
BUUK	Qualified Support	f - positive	<ul style="list-style-type: none"> • Supports the modification, on the condition that IGT UNC Modification 115 is also approved and implemented with a joint release date. • Supports the principle that the modification will increase efficiency in the process of accessing data within the Data Enquiry Service (DES), in line with relevant objective F. • This modification ensures and facilitates the alignment of processes between the IGT UNC and UNC, which will

			<p>provide commonality when changes to the data permission matrix is made. The intention going forward is that the data permissions matrix will be managed under the DSC Contract Management Committee.</p> <ul style="list-style-type: none"> • Would like to see evidence of how this will work in practice, including processes and procedures that are to be followed to ensure sufficient representation is made but also to protect data where deemed appropriate. • Self-Governance status supported on the condition that the change should only be implemented if IGT UNC 115 is also implemented. • The implementation date In the UNC should coincide with the IGT UNC 115, and as such if the November release is required to be pushed back to November 9th/10th, this would be the preferred approach to release. • The creation of this additional activity to be undertaken by the CDSP will lead to the creation of additional DSC Service Lines and therefore additional ongoing costs. It would be beneficial to note whether this will be a general service line and therefore a cost to all parties or specific constituency service lines. • This modification will lead to the raising of DSC Change Proposals. The cost of the new service line(s) and any associated DSC Change Proposals required have yet to be discussed, including who the relevant funding parties will be.
Cadent	Support	f - positive	<ul style="list-style-type: none"> • This modification seeks to incorporate a Data Permissions Matrix within the UNC and utilise the DSC Contract Management Committee to determine relevant exceptions to the disclosure of Protected Information under the UNC. • Agrees the overall process would become much more responsive to change rather than requiring a UNC modification each time an amendment to the permissions was required. • Notes additional safeguards are also included which would require a UNC modification where a new entity is to be added to the Data Permissions Matrix and also to allow the DSC Change Management Committee to utilise the UNC modification process when they believe this is required. • Agrees with Self-Governance Status.
ES Pipelines	Qualified Support	f - positive	<ul style="list-style-type: none"> • Supports the notion of improving efficiency in the change process for the UNC and is in general in support of this

			<p>proposal. However, has concerns regarding the appropriateness of the solution as they believe that all due care and diligence should be taken with any decision to alter data permissions.</p> <ul style="list-style-type: none"> • Recommends that in the process to alter data permissions that the DSC Contract Management Committee must also consult with the DSC Change Management Committee before deciding. The rationale for this is because the DSC Change Management Committee's remit is to deliberate on change /new service requests and also to provide the basis on which a change or modification may be proposed. • Suggest that the DSC Contract Management Committee have the ability to pass a decision to alter data permissions over to the UNC (and IGT UNC) if they are unable to make a decision for any reason, meaning that a modification would have to be raised • Does not agree with the Self Governance status, as the decision to alter data permissions via the API to businesses such as Suppliers or Price Comparison Websites could have an effect on the choice available in the market place and therefore competition. If such a decision is made imprudently, these effects could be negative. As such they believe that an authority decision may be required. • Implementation should coincide with implementation of IGT UNC Modification 115.
Gazprom	Support	f - positive	<ul style="list-style-type: none"> • This modification will introduce a permissions matrix that will enable requests to be managed in a more efficient and timely manner. It will permit the release of data in line with the matrix but will still require any new data items that are proposed to be added to the matrix to be subject DSC Contract Management approval. Additionally, the introduction of new categories of users will still require a UNC modification. • Agree that this modification is positive in respect of Relevant Objective (f) Promotion of efficiency in the implementation and administration of the Code, as it formalises the permissions for the release of data and sets out the process in which these can be amended. In addition, it would reduce the need to raise UNC modifications to provide permission to release data where this would be of a non-material nature, making the process more responsive and efficient.

			<ul style="list-style-type: none"> • Agree with Self-Governance Status
Npower	Support	f - positive	<ul style="list-style-type: none"> • This proposal is to formalise an already existing process. • Agree with Self-Governance Status • Agree that the release of this modification should be aligned with IGT UNC Modification 115.
Scotia Gas Networks	Qualified Support	f - positive	<ul style="list-style-type: none"> • Offer Qualified Support and agrees that the objective is positive and helps to formalise existing processes. • Would like a better understanding how it will work in practice. • Understands where new data items are proposed, these will be subject to the review and approval by the DSC Contract Management Committee. Moreover, new categories of Users will require separate UNC Code Modifications. • Mindful of General Data Protection Regulation (GDPR) obligations and therefore would require sight of the processes and procedures proposed to ensure their management and governance is suitably robust. • Has reviewed the current CDSP's Privacy Statement and acknowledge that specific GDPR articles are being taken into consideration. However, the additional understanding of the processes behind the Privacy Statement would reassure SGN that the individual's rights such as data access, rectification, erasure etc. are fully acknowledged and implemented in the modification. • Agree with Self-Governance Status
Wales & West Utilities	Support	f - positive	<ul style="list-style-type: none"> • Agrees 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 agency 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. <ul style="list-style-type: none">• Agree with Self-Governance Status
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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 0649S [should / should not] be implemented