UNC Workgroup 0668S Minutes

Enabling permissions for the provision of information to Alt Han Company to support smart metering roll-out (including IGT Modification 116 - Enabling permissions for the provision of information to Alt Han Company to support smart metering roll-out)

Thursday 27 September 2018

at Radcliffe House, Blenheim Court, Warwick Road, Solihull B91 2AA

Attendees

Bob Fletcher (Chair)	(BF)	Joint Office		
Mike Berrisford (Secretary)	(MB)	Joint Office		
Alexander Mann	(AMa)	Gazprom		
Amy Rawding*	(AR) Northern Gas Networks			
Andy Clasper	(AC)	(AC) Cadent		
Andy Miller	(AM)	Xoserve		
Chris Warner	(CW)	Cadent		
Dave Addison	(DA)	Xoserve		
David Mitchell	(DM)	SGN		
Edd Fyfe	(EF)	SGN		
Ellie Rogers	(ER)	Xoserve		
Gareth Evans	(GE)	Waters Wye Associates		
John Cooper*	(JC)	BUUK		
Kirsty Dudley*	(KD)	E.ON UK		
Lesley Bowen*	(LB)	EDF Energy		
Lorna Lewin	(LL)	Orsted		
Mark Jones	(MJ)	SSE		
Megan Coventry*	(MC)	SSE		
Megan Troth	(MT)	Xoserve		
Oorlagh Chapman*	(OC)	Centrica		
Rachel Clarke*	(RC)	Gemserv		
Rachel Hinsley	(RH)	Xoserve		
Richard Johnson	(RJ)	Xoserve		
Richard Pomroy	(RP)	Wales & West Utilities		
Shaheeni Vekaria	(SV)	Utility Warehouse		
Shanna Key	(SK)	Northern Gas Networks		
Shardul Pandit*	(SP)	Wales & West Utilities		
Simon Harris	(SH)	Xoserve		

^{*}via teleconference

Copies of all papers are available at: http://www.gasgovernance.co.uk/0668/270918

1. Outline of Modification

1.1. Xoserve Modification 0668S Introduction Presentation

During an overview of the presentation provided by SH, attention initially focused on the 'Background' slide, whereupon discussions centred on the fact that smart meters domestic sized, and as a consequence, some parties believe that information relating to other types of meter (rotary etc.) should not be shared (with AltHanCo) – it was noted that the finer points relating to these potential concerns would be covered under the Privacy Impact Assessment (PIA) document provisions.

In considering the 'Commercial models' slide, RP suggested that care would be needed around contractual aspects, in order to avoid ending up with 'loose' contracts.

The consensus was that confidential agreements would be needed, as there are currently no real 'tie in' levels within Code. Furthermore, under the proposed UNC Modification 0649S 'Update to UNC to formalise the Data Permissions Matrix' provisions, the CDSP would also need to have confidentiality agreements in place. It was noted that currently the Transporters and Xoserve have confidentiality agreements and that UNC Modification 0649S recognises the CDSP as a legal entity.

Moving on to consider the 'Commercial model 1 - Xoserve and AltHANCo' slide, AM explained that Xoserve are not looking for answers at this meeting, but simply exploring potential options.

AM pointed out that as Xoserve do not have vision of the AltHANCo Operations Service Provider and AlHANCo commercial relationship steps, this poses a potential risk with this model, and furthermore he is also unfamiliar with the Smart Energy Code (SEC) relationship aspects.

When GE enquired what would be expected to happen in the event that AltHANCo were to look to sue Xoserve, AM responded by outlining the role that the DSC Contract Management Committee would have in assessing and managing any potential (financial) risk – it was noted that the financial value of such a contract is small circa £5k, as it is only meant as a short term solution, so not a major concern at this point in proceedings. When asked if missing the 2020 smart metering roll-out target would result in these contracts being in place for longer than initially envisaged, AM reiterated that the proposals do not constitute an enduring service provision.

When asked which of the two models Xoserve would favour, AM indicated that presently they lean towards model 1, on the grounds that this would provide for a direct relationship with AltHANCo – it was noted that whilst both models would potentially work, more consideration is required before the industry chooses the most beneficial.

When asked whether or not model 2 means that implementation of UNC Modification 0668S would depend on the appointment of the AltHANCo Service Provider, AM confirmed that this is not the case, as we will be looking to have a suitable defined term in place. Additionally, AltHANCo are looking to procure the Service Provider by the end of 2018 and the tender for doing so has already been issued.

When KD enquired whether or not a protection provision could be added to the SEC to protect the UNC/DSC position (i.e. a third model option), AM responded by suggesting that even if obligations were put into the SEC role, there would still be a requirement appropriate UNC provisions and possibly service provider confidentiality agreements.

New Action 0901: Reference Commercial Model Options - Xoserve (AM) and Gemserv (RC) to consider a model 3 option based around a Smart Energy Code (SEC) provision obligation (including the possibility of a SEC contract).

During consideration of the 'Commercial model 2 Xoserve and AltHANCo service provider' slide, it was noted that the Alt HANCo Operations Service Provider would be identified via a UNC defined term provision.

It was suggested that should the Service Provider have limited or no assets value, then UNC/DSC parties would have little recourse should something go wrong – a point acknowledged by AM, which is part of the reasoning behind currently favouring model 1.

AM provided a very brief overview of the 'Privacy Impact Assessment (PIA)' slide, before moving on to look at the (draft) document itself in more detail under item 1.2 below.

1.2. Workgroup Privacy Impact Assessment (PIA) Draft Document Review

During a brief onscreen review of the draft document, AM highlighted three key questions that failed the test (Section 3, questions c), d) and k)).

During consideration of the 'PART THREE' table on page 4, AM advised that he would add a new item to cover off the Service Provider with limited or no asset value concerns.

Some concerns were voiced around why the information for all 24m meter points (premises / sites) is being provided to AltHANCo in the first instance when not all of these have smart meters. Responding, AM explained that by providing the information for all meters to AltHANCo it allows them to actively exclude any sites without a smart meter from subsequent data set runs / releases – a new risk was requested to be included in the PIA to highlight this concern.

AM moved on to explain that should UNC Modification 0649S be implemented, discussions would then continue within the DSC Change Management Committee arena, with UNC Modification 0668S being progressed in an amended form as it would need to amend the permissions matrix.

SK pointed out that at the 20 September 2018 Panel meeting, members had suggested that each data item request should be accompanied by a suitable justification (from AltHANCo) as to why it is needed – AM agreed to consider the request.

AM requested that parties provide feedback to Xoserve in order for them to amend the PIA to include both today's feedback and any new items raised outside of this Workgroup meeting.

It was noted that this matter is for discussion at the next IGT UNC Modification 116 Workgroup meeting and thereafter would be considered again at the October 2018 UNC Modification 0688S Workgroup meeting.

Concluding discussions, BF pointed out that as Panel have requested the Workgroup Report to be provided by no later that the 17 January 2019 Panel meeting, they (the Panel) cannot make a decision on the modification until after that Panel meeting due to the Self Governance determination criteria set out in the Modification Rules.

2. Initial Discussion

2.1. Issues and Questions from Panel

It was noted that the 20 September 2018 Panel members have requested that the Workgroup considers both the relevance and justification of data items (permitted use). Please also refer to discussions on item 2.3 below.

2.2. Initial Representations

None.

2.3. Terms of Reference

(http://www.gasgovernance.co.uk/0668)

During a brief onscreen review of the Individual Workgroup Terms of Reference there were no adverse comments from Workgroup attendees.

BF added 'Consideration of the Privacy Impact Assessment' to the Terms of Reference before re-publishing the amended document.

3. Next Steps

Xoserve to provide a model 3 SEC option for the AltHANCo relationship, and to also provide a suitably updated (draft) Privacy Impact Assessment document.

4. Any Other Business

None.

5. Diary Planning

Further details of planned meetings are available at:

https://www.gasgovernance.co.uk/events-calendar/month

Time / Date	Venue	Workgroup Programme		
10.30, Thursday 25	Elexon, 350 Euston Road, London NW1 3AW	Standard Agenda plus		
October 2018		 AltHANCo relationship Model 3 option 		
		Updated draft PIA consideration		
10.00, Thursday 22 November 2018	Radcliffe House, Blenheim Court, Warwick Road, Solihull B91 2AA	Standard Agenda		
10.00, Tuesday 17 December 2018	Elexon, 350 Euston Road, London NW1 3AW	Standard Agenda		

Action Table (as at 27 September 2018)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0901	27/09/18	1.1	Reference Commercial Model Options - Xoserve (AM) and Gemserv (RC) to consider a model 3 option based around a Smart Energy Code (SEC) provision obligation (including the possibility of a SEC contract).	Xoserve (AM) and Gemserv (RC)	Pending