

UNC Workgroup Report		At what stage is this document in the process?
<h1>UNC 0697S:</h1> <h2>Alignment of the UNC TPD Section V 5 and the Data Permissions Matrix</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 2px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 5px; padding: 2px;">01</span> Modification                 </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 2px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 5px; padding: 2px;">02</span> Workgroup Report                 </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 2px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 5px; padding: 2px;">03</span> Draft Modification Report                 </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 2px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 5px; padding: 2px;">04</span> Final Modification Report                 </div> </div>
<p><b>Purpose of Modification:</b></p> <p>This modification seeks to rationalise UNC TPD Section V5 and remove inconsistency with the Data Permissions Matrix.</p>		
	<p>The Workgroup recommends that this modification should be subject to self-governance</p> <p>The Panel will consider this Workgroup Report on <u>16 July, 2020</u>. The Panel will consider the recommendations and determine the appropriate next steps.</p>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 2px; margin-bottom: 5px;">Deleted: [not]</div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 2px;">Deleted: 21 May</div>
	<p>High Impact:</p> <p>None</p>	
	<p>Medium Impact:</p> <p>None</p>	
	<p>Low Impact:</p> <p>Transporters, Shipper Users, CDSP</p>	

Contents	
<a href="#">1 Summary</a>	<a href="#">3</a>
<a href="#">2 Governance</a>	<a href="#">4</a>
<a href="#">3 Why Change?</a>	<a href="#">4</a>
<a href="#">4 Code Specific Matters</a>	<a href="#">5</a>
<a href="#">5 Solution</a>	<a href="#">5</a>
<a href="#">6 Impacts &amp; Other Considerations</a>	<a href="#">7</a>
<a href="#">7 Relevant Objectives</a>	<a href="#">9</a>
<a href="#">8 Implementation</a>	<a href="#">10</a>
<a href="#">9 Legal Text</a>	<a href="#">10</a>
<a href="#">10 Recommendations</a>	<a href="#">10</a>
<a href="#">11 Appendix</a>	<a href="#">11</a>

  

Timetable	
<b>Modification timetable:</b>	
Initial consideration by Workgroup	26 September 2019
Workgroup Report presented to Panel	<a href="#">16 July, 2020</a>
Draft Modification Report issued for consultation	<a href="#">16 July, 2020</a>
Consultation Close-out for representations	<a href="#">7 August, 2020</a>
Final Modification Report available for Panel	<a href="#">12 August, 2020</a>
Modification Panel decision <sup>1</sup>	<a href="#">20 August, 2020</a>
An equivalent modification has been raised for the IGT UNC (IGT135), it would be beneficial for the two Modifications to be developed at one workgroup.	
<sup>1</sup> <a href="#">Submitted to Panel at a week's notice</a>	

Any questions?

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## 1 Summary

### What

UNC Modification 0649S introduced the **Data Permissions Matrix (DPM)** to reduce the administration necessary to release data to relevant parties (this term is intended to indicate either market participant roles (e.g. MAM / MAP) or where the release of data is intended to specific organisations). When this modification was implemented the fundamental review of the existing Protected Information aspects of the UNC was not conducted therefore this part of the UNC is inconsistent. To ensure consistency across UNC and the Data Permissions Matrix, including removing the detail from the UNC which describes users and the data items that parties can access. In parallel, the DPM will be updated to remove the services (mechanism) around how the data is shared to each market participant type (**user**). This will eliminate the need for DSC Contract Management Committee (CoMC) to approve release of a data item via other services, unless they chose to apply different criteria to different services. With this approach, an existing user who already has access to data will not require additional consent to receive the same data in a different format via an alternative mechanism, unless the DSC Contract Management Committee determine that it is necessary to do so.

### Why

Making this change will remove ambiguity and any inconsistency between the UNC and the DPM. The DPM will clearly detail the parties able to access data, and those data items each party can have access to.

This will prevent misalignment between the UNC and the DPM whilst making it explicit who can have access to data.

### How

This modification proposes to ensure consistency across UNC and the DPM

It seeks to remove from UNC reference to the users and actual data items users have access to. These users and the data items they have access to will be detailed within the DPM. Where certain conditions are explicitly stated for a user to gain access to data, these will be removed from the UNC, assessed, and where necessary retained within the DPM supporting documentation which forms part of the DPM (formally known as the Operating Guidelines Document – Data Permission Matrix Conditionality). This document is intended to provide a summary of all users within the DPM and provide conditionality details agreed by DSC Contract Managers within the DSC CoMC. This document will form part of the DPM.

It also proposes to add the parties to the DPM which are currently referenced in UNC TPD Section V5 – Protected Information who are not currently detailed within the DPM as a user type.

Please note, parties who do not require DSC CoMC permissions to gain access to data, will not be added as a user within the DPM. Access for these parties will be considered on a case by case basis. Examples that could fall under this category of user could include but not limited to Ofgem, HSE.

For the avoidance of doubt, this modification does not intend to control or change any National Grid NTS data which is set out within UNC TPD Section V5. To confirm, National Grid NTS data is out of scope of this modification.

Please note, if there is a UNC code clause which allows a user access to data which is not currently detailed within the DPM, the UNC code clause will supersede the DPM. Every effort will be made to avoid this situation and ensure that users who have gained consent to access data and are detailed within the UNC are also covered under the DPM.

Commented [AR1]: Version 5 update

**Deleted:** It seeks to remove from UNC reference to the users and actual data items users have access to. These users and the data items they have access to will be detailed within the DPM. Where certain conditions are explicitly stated for a user to gain access to data, these will be removed from the UNC, assessed, and where necessary retained within the Operating Guidelines Document – Data Permission Matrix Conditionality against the relevant user. This document details any additional conditionality that is not set out in the DPM which is relevant to the service provision and can be found on Xoserve.com via the following [link](#)...

The equivalent changes to the DPM will be made to remove the services (mechanism) around how the data is shared to each user type. This will eliminate the need for the CoMC to approve release of a given data item under another service, unless the CoMC chooses to do so. With this logic, an existing user who already has access to data will not require additional CoMC approval to receive the same data in a different format via an alternative mechanism. The DPM will still have a Portfolio and Community view for each user type<sup>1</sup> and detail the data they are able to access.

## 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.

Equivalent changes are necessary to the IGT UNC, so it is recommended that the IGT UNC modification, IGT135 follows 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<sup>2</sup>, was developed to formalise the DPM within the UNC. The DPM was intended to describe the Protected Information data items that each market role type is entitled to receive and to reduce the governance burden on a data service user once a use case had been established by that user.

Modification 0649S did not fully review existing UNC TPD Section V5 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 DPM.

Several entities specified in UNC TPD Section V5 'Information and Confidentiality' are not all currently referenced in the DPM because the DPM was originally created to only describe of data via a specific service. This modification is looking to reference these within the DPM to ensure both are aligned. These parties being proposed to be added to the DPM are:

- Energy Theft Tip-Off Service (ETTOS)
- Theft Risk Assessment Service (TRAS)

<sup>1</sup> Where registration details or appointment of a user type is recorded in UK Link systems.

<sup>2</sup> [UNC Modification 0649S: Update to UNC to formalise the Data Permission Matrix](#) and [associated legal text](#)

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- The holder of the smart meter communications licence

Citizens Advice Bureau and Citizens Advice Bureau Scotland (CAB) It also proposes to remove Authorised Agency Users from the DPM. Authorised Agency Users were historically users such as the police and HSE, however their access to the Data Enquiry Service (DES) was revoked. As detailed in the 'How' section, these parties do not require CoMC approval to gain access and therefore are managed outside of the DPM and should be removed as a user.

Major Energy Users are currently detailed within the DPM. We are proposing this user is renamed to Industrial and Commercial Consumer within the DPM.

This Modification also looks to rationalise UNC TPD Section V5 so that the users who have access to data and the data available to them is specified in the DPM, 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 the [Operating Guidelines DPM Conditionality](#) document, that specifies the parties, data items and delivery medium, can be found on [Xoserve.com](#)

## 5 Solution

Clause 5.5.2(j) within Section V – General should be amended to remove the sentence regarding the Data Permissions Matrix taking precedent if there is an inconsistency with V5:

(j) to the disclosure of Protected Information by the CDSP in accordance with the provisions of the Data Permissions Matrix (as defined in paragraph 5.2.1(g) of section D of the General Terms). ~~In the event of an inconsistency between the provisions of paragraphs 5.5, 5.11 or 5.15 – 5.18 of this Section V and the Data Permissions Matrix, the Data Permissions Matrix will take precedent.~~ For the avoidance of doubt, a Code Modification is required to add a new User type (e.g. Supplier, Price Comparison Website etc.) to the Data Permissions Matrix

For the avoidance of doubt, this modification intends to keep the current logic in place for adding a new user to the DPM, therefore a Code Modification will still be required for this activity despite the proposal not to specifically reference users added to the DPM in the UNC itself.

GT-D 5.2.1(g) is where the Data Permissions Matrix is defined in UNC and this clause is proposed to be updated as part of this Modification. This is to remove the reference to the services by which a user can access data as this is being removed from the DPM:

(g) a document prepared and managed by the CDSP which sets out the data items available to the Parties by service (i.e. application programming interface/Data Enquiry Service/Telephone) (the "Data Permissions Matrix").

Commented [AR2]: Version 5 update

It is proposed that UNC TPD Section V5 is rationalised, removing the users form V5 along with reference to the data items such users have access to and also removing a number of annexes to Section V.

For the avoidance of doubt, it is intended to retain Clause 5.5.3(f) to a consumer or an appropriate person to the extent designated by the authority within Standard Special Condition A31 of the Transporter's Licence.

**Commented [AR3]:** Should we add a comment to say why? I think answer is that it's done via M-number help desk - CHECK

Remove the following clauses that define users:

- Clause 5.5.2(k) \_\_\_AlthANCo
- Clause 5.5.3(i) \_\_\_Other User
- Clause 5.5.3(j) \_\_\_Performance Assurance Framework Administrator
- Clause 5.5.3(k) \_\_\_The Energy Theft Tip-off Service ("ETTOS")
- Clause 5.5.3(l)\_\_\_The Theft Risk Assessment Service
- Clause 5.5.3(m)\_\_\_Price Comparison Website and Third Part Intermediary
- Clause 5.17 \_\_\_The holder of the smart meter communications licence
- Clause 5.11 \_\_\_Meter Asset Managers
- Clause 5.16 \_\_\_Meter Asset Providers
- Clause 5.18 \_\_\_Suppliers

The following clause and annexes within UNC TPD Section V5 are proposed to be removed and to some extent be included in the DPM supporting documentation (formerly known as the Operating Guidelines DPM Conditionality) but will otherwise be dealt with by the DPM:

**Commented [AR4]:** Version 5 update

- Annex V-5: Table of Supply Meter and Supply Meter Point data fields available (subject to verification) to the Registered Metering Applicant upon request
- Annex V-8: Historic Supply Meter Point Asset and Read Information is proposed to be relocated to Annex M-2.
- Annex V-9: Table of Supply Meter and Supply Meter Point data fields available (subject to verification and Section V5.16) to the Meter Asset Provider upon request.
- Annex V-10

**Deleted:** The following clause and annexes within UNC TPD Section V5 are proposed to be removed and to some extent may be included in the Operating Guidelines document but will otherwise be dealt with by the DPM: ¶

**Commented [AR5]:** Moved so annexes are in sequence

Clause 1.4.1(a) and (c) and Clause 1.4.2(b) should be amended to point to the Data Permissions Matrix rather than V5 for the disclosure of certain information:

**Commented [AR6]:** Version 5 update

1.4.1 \_\_\_Direct Functions of the CDSP to support implementation of this Section V are:

- (a) \_\_\_disclosing Supply Meter Point information in accordance with ~~paragraph 5.14~~ **the Data Permissions Matrix;**
- (c) \_\_\_disclosing MAP information in accordance with ~~paragraph 5.16~~ **the Data Permissions Matrix;** and

**Deleted:** <#>Annex V-8:Historic Supply Meter Point Asset and Read Information is proposed to berelocated to Annex M-2. ¶

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1.4.2 \_\_\_Agency Functions of the CDSP to support implementation of this Section V are:

- (b) \_\_\_disclosing smart meter data in accordance with ~~paragraph 5.17~~ **the Data Permissions Matrix;** and

**Deleted:** (d) appointing and managing the PAFA.¶

It is proposed that additional clauses are added to the UNC to reference:

- The CDSP may only disclose information to DPM User types who are not also signatories to the DSC if they have entered into Third Party Services Agreements which comply with the Third-Party Additional Services Policy
- The CDSP shall, no later than 31 March in each year, publish a report identifying those DPM Users which have a Third Party Services agreement in place with the CDSP for the disclosure of Protected Information as contemplated by the clause above.

It also proposed that Clause 5.15 Disclosure of Historic Supply Meter Point Asset and Read Information (Annex V-8) is relocated to Section M where the Meter Information is provided to the disclosing User. The reference to Clause 5.15 within Clause 1.4.1(b) should be updated to point to the relocated section within Section M of UNC.

For the avoidance of doubt, the following users who are currently detailed within the UNC but not in the DPM will be added to the DPM following the implementation of this modification:

- Energy Theft Tip-Off Service (ETTOS)
- Theft Risk Assessment Service (TRAS)
- The holder of the smart meter communications licence
- Citizens Advice Bureau and Citizens Advice Bureau Scotland (CAB)

Commented [AR8]: Version 5 update

Deleted: <#>The CDSP may only disclose information provided that the parties / DPM Users have entered into Third Party Services Agreements which comply with the Third-Party Additional Services Policy

Commented [AR9]: Version 5 update

Deleted: this paragraph [DPM paragraph reference]

## 6 Impacts & Other Considerations

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

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

None

#### Cross Code Impacts

A modification is required to amend 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.

## Workgroup Impact Assessment

### Background:

This proposal has been developed over a number of iterations, with the original versions proposing that data access authorisations, as set out in the UNC and the data items and delivery platforms used to provide the service, as set out in the DPM, should be aligned. This meant adding some Data User Types that are specified in the DPM to the UNC, and similarly, adding some Data User Types specified in the UNC to the DPM.

The Data User Types included in the DPM requiring inclusion in the UNC were:

- Authorised Agency Users
- Major Energy Users

The Data User Types included in the UNC, requiring inclusion in the DPM were:

- Energy Theft Tip-Off Service (ETTOS)
- Theft Risk Assessment Service (TRAS)
- Performance Assurance Framework Administrator (PAFA)
- Data Communications Company (DCC)

During the development phase, the following facts have come to light and modified the list of Data User Types affected:

1. It was recognised that some “**Authorised Users**”, (such as the Police and the HSE), have statutory powers to investigate crimes, which means that they have a legal right to access data held by the CDSP. Given this high level of authority, it was viewed as superfluous to document these arrangements in the contractual framework. Similarly, Ofgem have statutory powers and, therefore, do not need to be recognised in the UNC as a Data User Type or listed in the DPM.
2. However, also included in the broad category of Authorised Users is access for **Citizens Advice** who, since a quango<sup>3</sup> review enacted in 2014 resulted in BEIS funding being redirected to them, have been the organisation with the duty to investigate energy complaints from the public. These activities were previously undertaken by Consumer Focus, and consequently, it was acknowledged that **Citizens Advice** and **Citizens Advice Scotland**, as the designated successor organisations, should be have their access permissions detailed explicitly in the DPM.
3. The inclusion of **PAFA** in the DPM was delivered by the implementation of Modification 0707S: Introducing 'Performance Assurance Framework Administrator'<sup>4</sup>.
4. It was clarified that **Major Energy Users** data access arrangements were originally established though SPAA – Schedule 23 and, as is currently the case, access for individual organisations would in future be managed by the CDSP.
5. Major Energy Users have been re-named as **Industrial & Commercial Consumers** for the purposes of inclusion in the DPM.

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<sup>3</sup> quasi-autonomous non-governmental organisation

<sup>4</sup> Modification 0707S: Introducing 'Performance Assurance Framework Administrator'

**Current approach:**

Since the submission of version 4 of the proposal, the proposed solution has changed significantly in scope from the original concept of aligning the DPM to the high-level permissions established in the UNC. Under the new version of the proposal, all Data User Types and their details, would be de-listed from UNC and, generally, the authority and obligation for managing access to CDSP data would be undertaken through DSC governance.

The exception to this overarching DSC governance would be the addition of a new Data User Type. To establish a new user, a UNC-governed Modification would need to be approved. Once the Modification is implemented, details of the specific data items available to the new Data User Type, would be managed by the DSC Contract Management Committee.

The workgroup are generally supportive of the move to rationalise data permissions in the UNC and move from the current arrangement where Data User Types are defined/described in the UNC, with the DPM specifying the detail, to one where the CDSP document(s) specified in UNC GTD5.2.1(g), would be the reference documentation for recording all aspects of permitted access to CDSP data.

Note relating to Data User Types recently added to the UNC:

During the development phase of the proposal, two new Data User Types have been added to the UNC & DPM, these are:

1. Research Body<sup>5</sup> - Approved by Panel on 21 May 2020 & Implemented on [date tba]
2. Electricity System Operator<sup>6</sup> - Approved by Panel on 21 May 2020 & Implemented on [date tba]

Therefore, in-line with the new approach, while only recently added to the UNC, to ensure consistency with this proposal, they have been added to the list of Data User Types to be removed from UNC.

Commented [AR10]: Do the Operating Guidelines get a mention anywhere in the legal text?

Commented [AR11]: VALIDATE APPROACH: CHECK THESE REMOVALS ARE INCLUDED IN FINAL VERSION OF TEXT

## 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 <ul style="list-style-type: none"> <li>(i) the combined pipe-line system, and/ or</li> <li>(ii) the pipe-line system of one or more other relevant gas transporters.</li> </ul>	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: <ul style="list-style-type: none"> <li>(i) between relevant shippers;</li> </ul>	None

<sup>5</sup> Modification 0702: Introducing 'Research Body' as a new User type to the Data Permissions Matrix and UNC TPD Section V5

<sup>6</sup> Modification 0715: Amendment of the Data Permission Matrix to add Electricity System Operator (ESO) as a new User type

(ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	
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 DPM and removing reference to specific data items within UNC which are now covered under the DPM 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.

Commented [AR12]: I think this needs work now we're going for the "DSC only" solution

## 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

### Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that this self-governance modification should proceed to consultation.

- ~~This proposal requires further assessment and should be returned to Workgroup.~~

## 11 Appendix

Appendix 1: Example of how each Data User Type will be detailed in the [\[Operating Guidelines\]](#)

Commented [AR13]: Check Title

### Alt Han Company (AltHANCo)

#### **Organisation Details / Recognised Role**

Name: Alt Han Company Limited (AltHANCo)

Company Number: 10002859

#### **Background**

The Alternative Home Area Network Company (AltHANCo) has been established as a special purpose company to allow all GB energy suppliers to deliver Alternative Home Area Network (Alt HAN) technological solutions and services.

AltHANCo was added to the DPM as a new User type on 01 March 2019 through the implementation of UNC Modification [0668S](#) and IGT UNC Modification [116](#).

#### **Special Conditionality**

Data items and conditionality to give AltHANCo the permissions to receive data via reporting mechanism was agreed through the approval of a Disclosure Request Report - [Alt Han Company \(Alt Han Co\) Request for Ongoing Provision of Supply Point Portfolio Information](#).

A number of data items allowable to them have masking properties present along with overriding report exclusions (not for specific data items). These conditionality rules are specified below.

#### **Overriding Report Exclusions:**

- Class 1 Supply Meter Points to be excluded
- Any Supply Meter Point with an AMR fitted to be excluded
- All twin stream Supply Meter Points to be excluded
- Special Meter Supply Points (Unique Sites) to be excluded; *however, LPG sites would be included*
- Any Supply Meter Point with a Corrector to be excluded
- Any Supply Meter Point with a Meter Point Status of DE or EX to be excluded
- Supply Meter Points with an AQ greater than 200,001 will be excluded
- Any Supply Meter Points with a meter asset with capacity above 11 cubic metres will be excluded

#### **Data Item Conditionality:**

- **Meter Mechanism:** Any value but S1, S2, NS will be masked (i.e. set to NULL)
- **Supply Meter Point AQ:** AQ Values to be converted into Ranges (actual AQ value not provided)
  - 0 - 30,000
  - 30,001 – 73,200
  - 73,200 – 200,000

#### **Review Timescales:**

- Xoserve send data to AltHANCo on a quarterly basis
- The service is expected to last two year by which the analysis is anticipated to be completed.  
*This will be reviewed and once completed, the AltHANCo would be removed from the DPM*

#### **Commercial Model**

A Third-Party Services Contract is in place between Xoserve and the AltHANCo to allow the release of the data

Commented [RE14]: This is if the user is not an organisation, but a recognised role type and we need to confirm who they are.