

Representation - Draft Modification Report UNC 0697S

Alignment of the UNC TPD Section V5 and the Data Permissions Matrix

Responses invited by: **5pm on 11 September 2020**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Sally Hardman
Organisation:	Southern Gas Networks and Scotland Gas Networks
Date of Representation:	10 th September 2020
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

SGN offers its support for this modification. We agree with the overall objective set out to simplify the access to data via the Data Permissions Matrix (DPM) eliminating any ambiguity or inconsistency between the UNC and DPM.

The overarching requirement for new user groups to access data will be retained within the UNC and continue to require a modification providing visibility and ratification of the requirement for access to data via the DPM.

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

We agree with the Self-Governance Statement within the modification.

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

We agree that the proposed implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

The implementation of this modification should be coordinated with the corresponding IGT UNC modification (IGT135).

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

No SGN costs or system impacts identified.

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

Yes, SGN are satisfied that the legal text will deliver the intent of the solution.

We do however acknowledge that the BEIS text changes to section V5.17 (V5.17.2, V5.17.3 & V5.17.4) which will be removed in its entirety by this modification were implemented after the conclusion of the workgroup and therefore have not been considered.

Modification Panel Members have requested that the following questions are addressed:

Q1: Respondents are asked to provide views on whether they believe that there are any potential SCR impacts

SGN does not believe that this modification impacts the SCR, we are of the belief that as part of the Faster Switching Programme the Data Permission area of code is being considered. At this time without a statement from Ofgem we are unable to clarify if this will be of a material nature.

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

None.