**Disclosure Request Report**

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| **Prepared by:** | David Addison |
| **Submitted for:** | February 2024 CoMC |
| **Decision details:** | CoMC is requested to approve this request and the amendment to the Data Permission Matrix.  |
| **Date:** | 6th February 2024 |
| **Ref** | DRR – Feb24-01 |

1. **Introduction and background**

Smart meters have a tamper alert mechanism to identify instances where the metering arrangements **may** have been interfered with for the purposes of preventing accurate recording of the energy used. These tamper alert mechanisms can be sensitive leading to a potentially high volume of false flag tamper alerts, which reduces the likelihood of such tamper alerts being acted upon. RECCo are conducting Proof of Concept with a small number of gas Suppliers. This PoC will take a population of Supply Meter Points within the participating Supplier portfolios where a tamper alert has been reported to try to identify whether these Supply Meter Points have any records centrally recorded that would indicate that they have been physically visited by a party conducting a legitimate activity – such as Metering; Meter Reading or Meter Inspection. If such site visits are identified this may enable Suppliers to discount false flag tamper alerts, and enable them to focus upon the tamper alerts that require investigation.

This Proof of Concept will be conducted by RECCo providing a sample of Supply Meter Point References and a date range within which the tamper alerts have been recorded. In response to this request, we will provide a mixture of the current details recorded within UK Link, and relevant history information that may indicate that a Supply Meter Point was visited. This Proof of Concept is being conducted by RECCo with the participating Suppliers, but the history information provided to RECCo may extend beyond that Supplier’s period of ownership.

For the avoidance of doubt, this Proof of Concept is not trying to establish whether a consumer has sought to deliberately alter the accuracy of the meter. It is seeking to determine whether consumers can be discounted from a subsequent process that may conduct such investigations. The Proof of Concept is also expected to provide a sample of Supply Meter Points where no tamper alerts have been recorded. This control sample will be used to determine any instances of visits that have not triggered the tamper, but also further ensures that inclusion in the sample of a Supply Meter Point does not infer a consumer is acting inappropriately.

If successful, this PoC may be extended to create an enduring service to RECCo, but this would be subject to a further RECCo consultation in the future.

This DRR will result in the addition of a number of data items to the Data Permissions Matrix. These are shown in Appendix 2 below.

Where the data is released in support of the Proof of Concept this has been recorded as ‘Yes (POC)’ in the DPM to support removal at the end of the PoC or the subsequent DRR that will establish this as an enduring service.

The changes are intending to provide the following additional data above those currently received by RECCo. The data requested is a mix of ‘current’ data (i.e. it is the latest details recorded against the Supply Meter Point) and data that is compiled to form a history. The history data will be provided for the requested data period only, unless otherwise stated:

* **The following ‘current’ data items are proposed to be provided:**
	+ Latest Meter Reading Information. Meter Reading History is proposed to be provided for the requested data period, but provision of Last Meter Reading Information will provide a distinct result if no Meter Readings have been received in the period in question.
	+ Current Bypass Status / Effective Date. It is proposed to provide any history data recorded within the requested data period, but provision of current details will indicate whether a bypass is recorded but no history is available in the requested data period.
	+ Last Inspection Date. History information is not recorded for this data item. Provision of the latest inspection date will enable confirmation that no inspection was received in the period, where this exists outside of the requested data period.
	+ DCC Service Information. This set of data will identify when the DCC started provision of the Smart Meter Reading service.
* **History Data**
	+ **Metering Data obtained from the Connection and Disconnection Store (C&D Store)**. The C&D Store forms part of the UK Link system. Where the CDSP receives a notice of a physical activity at the Supply Meter Point (e.g. via a JOB or CDN) then the C&D Store will be updated provided that the minimum data criteria are met. Data within this store may indicate that the Supply Meter Point was physically accessed, but the record may not have updated the Metering data recorded in the UK Link. Records from this data store will only be provided for the requested data period.
	+ **Metering Data obtained from the MEM ONJOB Store.** MEMs are required to provide any ONJOBs to the CDSP to enable the MAP to be recorded if it is not provided by the Shipper through the JOB flows. Data within this store may indicate that the Supply Meter Point was physically accessed, but a record to update the UK Link system may not have been received. Records from this data store will only be provided for the requested data period.
	+ **Meter Reading History –** will be provided for the requested data period only. This will include the Reason and Source of the Meter Reading – so that this can be ascertained whether physical access to the site was obtained, including by the consumer.
	+ **Meter Asset Data History –** will be provided for the requested data period only. This will determine whether any activity was recorded at the Supply Meter Point for the period, which would indicate access from a Meter Worker.
	+ **Meter Bypass Status History -** will be provided for the requested data period only. This might determine whether an authorised party accessed the Supply Meter Point in the period.

This DRR also proposes to update the DPM Conditionality Document for RECCo:

DSC Contract Management Committee approved the release of additional information to RECCo to support the DRR 'RECCo POC to discount False Flag Tamper Alerts' at the February 2024 meeting.  This PoC is intended for a short period of time (maximum 1 year), and at the end of this period the CDSP will be required to amend the DPM to remove references to the data items flagged in the DPM as 'Yes (PoC)' against RECCo, or to submit a DRR to ensure that the service endures.

1. **Data items**

This DRR is to request the amendment to the DPM described above.

1. **Privacy Impact Assessment**

Where the disclosure of information includes the processing of personal data a Privacy Impact Assessment may be required.

Xoserve has considered the various tests that may be applied and considers that none of these are met and so a Privacy Impact Assessment is not required.

The tests (and answers) applied in determining whether a Privacy Impact Assessment was required were:

a) Will the project involve the collection of new information about individuals?

**No.**

b) Will the project compel individuals to provide information about them?

**No.**

c) Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?

**This data will extend the information available to RECCo but there is no personal information being disclosed to RECCo that is considered personal data, save the postcode that they are already entitled to access. Also note, given the nature of these Supply Meter Points (i.e. smaller Supply Points then it is unlikely that the provision of the postcode data will enable identification of an individual).**

d) Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?

**This data will be assessed to determine whether a tamper alert can be discounted due to a recorded activity at the Supply Meter Point.**

e) Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.

**No.**

f) Will the project result in you making decisions or acting against individuals in ways that can have a significant impact on them?

**No. RECCo are conducting an assessment of tamper alerts. The data that is being provided to RECCo will assist them in discounting consumers from an existing process which consumers may find intrusive.**

g) Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.

**No. The information provided will only provide information from the UK Link system where potentially a party has physically accessed the meter.**

h) Will the project require you to contact individuals in ways that they may find intrusive?

**No. This process may assist in discounting consumers from further investigations.**

i) Will the disclosure of information utilise new technology for Xoserve?

**No.**

j) Will the disclosure include information that identifies a vulnerable customer?

**No.**

k) Will the disclosure release mass data to a party?

**No. RECCo will provide a list of Supply Meter Points against which we will return the specified data items.**

l) Will the disclosure include information that identifies an occurrence of theft of gas?

**No – Suppliers have a set of tamper alerts that may indicate tampering at a meter and consequently a Theft. This data is intended to support EXCLUSION of Supply Meter Points from the existing tamper alert investigations currently conducted by Suppliers.**

m) Will the disclosure require a fundamental change to Xoserve Business?

**No.**

1. **Commercial model**

This will be provided in accordance with the DSC Third Party and Additional Services Policy. For information, this service will be provided to RECCo as a CDSP Further Service, which will be recorded in the relevant REC Service Definition if this becomes an enduring service following the PoC.

1. **Method of access to the dataset**

RECCo will provide a dataset(s) of the relevant Supply Meter Points and we will provide the response via secure means (either SFTP or password protected emails with dual factor authentication).

1. **CoMC determinations**

CoMC is requested to approve this Disclosure Request Report and approve publication of the DPM v26.



**Appendix 1: Current Data Permissions Matrix with proposed changes as per this Disclosure Request Report**

Please see attached the proposed changed to the Data Permissions Matrix as a result of approving this DRR. Changes/additions are marked up in red text.

This is proposed to be published as v26 of the DPM, subject to CoMC approval.

**Appendix 2: Additional Data Items added to the Data Permissions Matrix as a result of this Disclosure Request Report**

