

UNC Workgroup 0574S Minutes
Creating permissions to release supply point data to the Theft Risk
Assessment Service (TRAS)
Thursday 26 May 2016
at Consort House, 6 Homer Road, Solihull. B91 3QQ

Attendees

Andy Clasper	(AC)	National Grid Distribution
Bob Fletcher (Chair)	(BF)	Joint Office
Colette Baldwin	(CB)	E.ON UK
Dave Addison	(DA)	Xoserve
David Mitchell	(DM)	Scotia Gas Networks
Edd Hunter	(EH)	RWE npower
Fraser Mathieson	(FM)	Scotia Gas Networks
Gareth Evans*	(GE)	Waters Wye Associates
Jon Dixon*	(JO)	Ofgem
Karen Visgarda (Secretary)	(KV)	Joint Office
Kirsten Elliott-Smith*	(KES)	Cornwall Energy
Lorna Lewin	(LL)	DONG Energy
Mark Jones	(MJ)	SSE
Naomi Nathanael	(NN)	Plus Shipping
Phil Lucas	(PL)	National Grid NTS
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mullinganie	(SM)	Gazprom
Steve Nunnington	(SN)	Xoserve
Suchitra Hammond*	(SHa)	Ofgem

Copies of all papers are available at: <http://www.gasgovernance.co.uk/0574/260516>

The Workgroup Report is due to be presented at the UNC Modification Panel by 18 August 2016.

1.0 Introduction and Status Review

1.1. Review of Minutes (28 April 2016)

The minutes of the previous meeting were approved.

2.0 Workgroup Report

2.1. Consideration of Business Rules

During an onscreen review of the (draft) Workgroup Report, participants considered that the business rules and the impacts on data protection. EH provided an overview of the proposed amendments to the modification, which he intended to submit following the meeting.

2.2. Consideration of Potential Data Protection Issues / Impacts

EH agreed to amend the modification in relation to the DES data and said the same DVD data could be used and that the LDZ was not a sensitive data item in terms of data protection. PL requested clarification that Unique Sites were not to be included

and EH confirmed he would make the necessary amendments. PL agreed to send a definition for Unique Sites, which could be included in the modification.

RP wanted an explanation and justification to be included in the modification regarding why Experian wanted the data when Suppliers were providing it. EH said it was needed for Theft detection and comparing portfolios of registered Supply Points against unregistered. Both NN and LL said this was not correct and that the data was not being used for Theft detection, but was being used for address matching. SH that Experian uses this data to assist with data validation. FM said on speaking internally with the SGN Legal Team, the MPRN and Address data is classed as personal data with regards to Data Protection. JD and SH said if that was the case, then the data would be handled in the correct manner by Experian, however it was a valid challenge and should be addressed via the representations during the consultation process. SM was concerned that the Data Protection Act was not used as an excuse not to provide data as his understanding the Data Protection should not be used in a way that protects criminal activity such as theft. JD further proposed that Ofgem could produce a Decision Letter to prove that the data would be handled in the correct manner, and drew attention to the fact that the Electricity Sector had been operating in this way for a considerable time. He also challenged that a similar change approved in another Code was causing problems in the UNC when the change is very straight forward and without risk.

JD noted that the forthcoming ETTOL service provider Modification 0584 was similar in scope to this modification. However, some felt the modification scope was different as is the intended use of the data

EH agreed to submit and amended modification which was to be used to update the Workgroup report and submitted to Panel.

2.3. Consideration of User Pays and Review of Impacts and Costs

SM wanted to know what the basis was for the charges in relation to non Code User Pays if the modification was going to Ofgem, and if that duration would be extended to potential legal challenges between Xoserve and Experian. JD said there was likely to be a similar modification raised next month in relation to theft but regarding a different medium – via telephonic.

2.4. Review of Relevant Objectives

All relevant objectives agreed by the Workgroup

2.5. Consideration of Legal Text

No NGN representative present, so there was no discussion regarding the Legal Text.

2.6. Completion of Workgroup Report

Workgroup Report completed

3.0 Review of Outstanding Actions

Action 0401: Northern Gas Networks (ARS) to provide draft legal text in time for consideration prior to be submitting to Panel on 16 June 2016. This action is now closed.
Closed.

Update: EH explained there was no NGN representative present and no Legal Text had been received prior to the meeting. The Workgroup agreed to waive its review of the text to allow the Workgroup Report to progress. **Closed**

Action 0402: Xoserve (DA) and npower (SP) to discuss the DVD data items offline, including whether or not LDZ information is also on the DVD and also whether or not any schedule 23 and SPAA considerations are required.

Update: EH confirmed that the LDZ information was not on the DVD, so this action could now be closed. **Closed**

4.0 Next Steps

Formal submission of the Workgroup Report to the 16 June 2016 Panel meeting.

5.0 Any Other Business

None.

6.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/Diary

There are no further Workgroup meetings planned at this time.

Action Table (26 May 2016)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0401	28/04/16	2.0	To provide draft legal text in time for consideration prior to be submitting to Panel on 16 June 2016.	Northern Gas Networks (ARS)	Closed
0402	28/04/16	2.0	To discuss the DVD data items offline, including whether or not LDZ information is also on the DVD and also whether or not any schedule 23 and SPAA considerations are required.	Xoserve (DA) & npower (SP)	Closed