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|--|---|
| UNC Modification | At what stage is this document in the process? |
| <h1 style="margin: 0;">UNC 0697:</h1> <h2 style="margin: 0;">Alignment of the UNC TPD Section V 5 and the Data Permissions Matrix</h2> | <div style="margin-bottom: 5px;">01 Modification</div> <div style="margin-bottom: 5px;">02 Workgroup Report</div> <div style="margin-bottom: 5px;">03 Draft Modification Report</div> <div style="margin-bottom: 5px;">04 Final Modification Report</div> |

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Purpose of Modification:

This modification seeks to rationalise UNC TPD Section V5 and remove inconsistency with the Data Permissions Matrix.








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|  | <p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> • subject to self-governance • assessed by a cross code UNC/IGT UNC Workgroup <p>This modification will be presented by the Proposer to the Panel on 19th September 2019. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p> |
|  | <p>High Impact: None</p> |
|  | <p>Medium Impact: None</p> |
|  | <p>Low Impact: Transporters, Shipper Users, CDSP</p> |

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| Timetable | |
|---|------------------------------|
| The Proposer recommends the following timetable: | |
| Initial consideration by Workgroup | 26 September 2019 |
| Workgroup Report presented to Panel | 21 May 2020 |
| Draft Modification Report issued for consultation | 21 May 2020 |
| Consultation Close-out for representations | 12 June 2020 |
| Final Modification Report available for Panel | 18 June 2020 |
| Modification Panel decision | 18 June 2020 |
| 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. | |

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Modification

1 Summary

What

UNC Modification 0649S introduced the **Data Permissions Matrix (DPM)** to reduce the administration necessary to release data to relevant parties. 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 TPD Section V5 drafting such that the UNC describes the parties entitled to access data, rather than the data items themselves. 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. 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.

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Why

Making this change will ensure consistency between the UNC and the DPM; it will make it clear in the UNC which user has access to data and any specific criteria user types must meet to gain access to data e.g. separate confidentiality agreements. The DPM will clearly detail the data items each user stated within the UNC TPD Section V5 – Protected Information can have access to.

This will prevent misalignment between the UNC TPD Section V5 – Protected Information and the DPM whilst making it explicit who can have access to data.

How

This modification proposes to ensure consistency across UNC TPD Section V5 – Protected Information drafting and the DPM

It seeks to remove from UNC reference to the actual data items users have access to and simply detail the users. Where certain conditions are explicitly stated for a user to gain access to data, these will be rationalised by removing the detail from UNC and including this 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](#).

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It proposes to add any parties referenced in the DPM that are not currently referenced in UNC TPD Section V5.

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

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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.

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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.

The equivalent changes to the DPM will be made to remove the services (mechanism) around how the data is shared to each user type provided that the mechanism for request of data is controlled. This will eliminate the need for the DSC Contract Management to approve another service. With this logic, an existing user who already has access to data will not require additional Committee approval to receive the same data in a different format via an alternative mechanism. To confirm, the DPM will still have a Portfolio and Community view for each user and detail the data they are able to access but no other conditions such as the mechanism to access data will be described.

Commented [RE1]: To be discussed at DWG: Request service vs Reporting

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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.

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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” - 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.

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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.

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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:

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- Energy Theft Tip-Off Service (ETTOS)
- Theft Risk Assessment Service (TRAS)
- Data Communications Company (DCC)
- Citizens Advice Bureau (CAB) as granted under the Public Bodies Order 2014.

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 which will be referenced in UNC TPD V5 following the implementation of this Modification (detailed under Clause 5.5.3 (i) in the 'Solution' section.

This Modification also looks to rationalise UNC TPD Section V5 so that the data available is specified in the DPM, rather than the UNC itself. We intend to create a consolidated section for the parties that are entitled to access data under the DPM to add clarity to the process for parties who are entitled to receive data.

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 **Operating Guidelines DPM Conditionality** documents that specifies the parties, data items and delivery medium and can be found on [Xoserve.com](https://www.xserve.com)

5 Solution

Clause 5.5.2(i) 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:

(i) 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.

It is proposed that UNC TPD Section V5 is rationalised, removing the actual data items users have access to and simply detail the users who have access. A new [DPM section] is proposed to be added to UNC TPD Section V5 which will simply detail the users which have access to data. This will relocate and redraft the following sections currently within Section V5 to the new [DPM Section]:

Deleted: <#>Performance Assurance Framework Administrator (PAFA)¶

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- Clause 5.5.3 (f) to a party identified in the [Network Code] entitled to receive data for balancing or change of supplier purposes pursuant to Standard Special Condition A31((2)(d)(ii).
- Clause 5.5.2 (k) in accord with the provisions of paragraph 5.5.2(j) and to the disclosure of Protected Information by the CDSP the Data Permissions Matrix (as further defined at paragraph 5.2.1(g) of section D of the General Terms) shall be amended to specifically authorise Alt Han Company (number 10002859) (“AltHANC”) as a new User type. For the avoidance of doubt and notwithstanding the provisions of this clause, the right to review the authority granted to a new User type shall be reserved.
- Clause 5.5.3 (i) to Industrial and Commercial Consumers, as required by paragraph 7.4 (‘Industrial and Commercial Consumer Data Access’) of Schedule 23, contained in the Supply Point Administration Agreement (‘SPAA’) made between the parties listed in Schedule 1 of the SPAA.
- Clause 5.5.3(j) to the Performance Assurance Framework Administrator, provided the terms of the relevant PAFA Contract require the Performance Assurance Framework Administrator to maintain the confidentiality of such information on terms no less onerous than those of this paragraph 5, save to the extent disclosure of such information is necessary to comply with the terms of the PAFA Contract; or
- Clause 5.5.3 (k) to a person appointed pursuant to the SPAA to provide Energy Theft Tip-off Services (“ETTOS”) when information is received by that person of an allegation of a potential theft of gas at a premises and the identity of the relevant Supplier is required. For the purposes of the Code ETTOS shall have the same meaning as contained within SPAA; or
- Clause 5.5.3 (l) to a person appointed pursuant to the SPAA to provide Theft Risk Assessment Service, on a quarterly basis, the following data items; Meter Point Reference Number, Meter Point Address and Postcode, and Meter Serial Number. For the purposes of Code TRAS shall have the same meaning as contained within SPAA; and
- Clause 5.5.3 (m) the CDSP are authorised to disclose the following data items: Supply Meter Point Reference Number, supply point address, Meter Post Code, supplier, meter mechanism, network operator, meter capacity, meter serial number, Annual Quantity, Local Distribution Zone to a Price Comparison Website where they have received consent from the domestic consumer and where they have entered into confidentiality and service agreements (on terms no less onerous than those in paragraph 5) and reasonable access conditions.
 - the CDSP shall, by 31 March each year, produce a report to identify the service recipients who have signed up to the confidentiality and service agreements;
 - “Price Comparison Website” (PCW) shall mean an internet-based price comparison service or other internet based TPI that provides comparisons between, and/or access to, personalised quotes for retail energy to domestic customers, and may carry out, on behalf of the domestic customer and instruction to change the domestic customer’s retail energy supplier, tariff or both;
 - “Third Part Intermediary” (TPI) shall mean an organization or individual acting as a third party intermediary between a domestic customer and a retail energy supplier.
- Clause 5.17 – Smart Meter Data Provision to Data Communications Company
- Clause 5.11 Disclosure of Supply Meter Point Information (Annex V-5)
- Clause 5.16 Disclosure of MAP Information (Annex V-9)
- Clause 5.18 Disclosure of Supply Point Premises Data

The following 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:

Deleted: consumer or an appropriate person to the extent designated by the authority within Standard Special Condition A31 of the Transporter’s Licence and a supplier shall be an appropriate person

Commented [RE4]: This will require the addition of two columns in the DPM Balancing Data and CoSupplier data

Deleted: where its application is for the receipt of data for change of supplier purposes;

Commented [RE5]: AltHANC

Commented [RE6]: Industrial and Commercial Consumers.

Deleted: to any person pursuant to an application made in accordance with paragraph 7.3 (‘Other User Access’) of Schedule 23, version dated 7 November 2008, contained in the Supply Point Administration Agreement (‘SPAA’) 11th June 2004 made between the parties listed in Schedule 1 of the SPAA

Commented [RE7]: PAFA

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- [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](#)
- [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](#)

It is proposed that additional clauses are added to the new [DPM section] of UNC Section V5 to reference:

- [Citizens Advice Bureau \(CAB\) who have access to UK Link data for the power to investigate and resolve domestic consumer matters and to request information which would aid them in those duties. This is granted under the Public Bodies Order 2014 \(No 631\)](#)
- [\[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\]](#)
- [\[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 this paragraph \[DPM paragraph reference\].\]](#)

[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 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 \(TRAS\)](#)
- [Data Communications Company \(DCC\)](#)
- [Citizens Advice Bureau \(CAB\)](#)

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.

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<#>Authorised Agency Users¶
<#>Major Energy Users¶

As well as adding users to the UNC, users who are currently detailed within the UNC but not in the DPM will need to be added to the DPM. These are: ¶

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

It further proposes to rationalise referencing to other conditions of access specific to users by setting criteria where a special condition for access is required for example a separate confidentiality agreement and describing this in detail within the Operating Guidelines DPM Conditionality. ¶

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 DSC Contract Management to approve another service. With this logic, an existing user who already has access to data will not require additional Committee approval to receive the same data in a different format via an alternative mechanism. To confirm, the DPM will still have a Portfolio and Community view for each user and detail the data they are able to access but no other conditions such as the mechanism to access data will be described. ¶

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. ¶

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. ¶
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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.

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 (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters. | None |
| c) Efficient discharge of the licensee's obligations. | None |
| d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers. | None |
| 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.

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.

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9 Legal Text

Text Commentary

Not provided (at this point)

Text

Not provided (at this point)

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that self-governance procedures should apply
- Refer this Modification to a cross code Workgroup for assessment.

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