

UNC Final Modification Report	At what stage is this document in the process?
<h1>UNC 0769S:</h1> <h2>Adding Local Authorities as a new User type to the Data Permissions Matrix</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 01 Modification </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>Local Authorities (LAs) have an ambition to lead the reduction of carbon emissions in their locality, often to meet net zero target dates that are accelerated ahead of the UK’s legally binding target date of 2050. To carry out this ambition LAs need to access data relating predominantly to consumers addresses and gas usage in order to target engagement with such consumers and monitor strategy outcomes.</p> <p>This Modification seeks to amend the UNC Data Permissions Matrix (DPM) to add LAs as a new User type.</p>	
<p>Next Steps:</p> <p>The Panel determined that this Self-Governance Modification should be implemented.</p>	
<p>Impacted Parties:</p> <p>High: None identified</p> <p>Low: CDSP, Shipper Users and Transporters</p> <p>None:</p>	
<p>Impacted Codes:</p> <p>An equivalent IGT UNC Modification will need to be raised and it would be beneficial for these Modifications to be developed at one Workgroup</p>	

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Timetable		
Modification timetable:		
Pre-Modification Discussed	27 May 2021	
Date Modification Raised	01 June 2021	
New Modification to be considered by Panel	17 June 2021	
First Workgroup Meeting (Distribution)	24 June 2021	
Workgroup Report to be presented to Panel	19 August 2021	
Draft Modification Report issued for consultation	19 August 2021	
Consultation Close-out for representations	13 September 2021	
Final Modification Report available for Panel (<i>at short notice</i>)	14 September 2021	
Modification Panel decision	16 September 2021	


 Any questions?

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1 Summary

What

LAs have an ambition to lead the reduction of carbon emissions in their locality, often to meet net zero target dates that are accelerated ahead of the UK's legally binding target date of 2050. They have approached Cadent to request information to help them target reduction strategies and provide visibility on what progress they are making against their goals.

LAs are asking for business names/addresses, customer type (commercial/industrial) their associated standard industrial classification code and their annual gas usage in kWh. They are also asking for post code level gas usage for all users (which can be aggregated).

This change will benefit UK PLC in its journey to Net Zero emissions.

Why

In line with TPD V5.5.2(j) this Modification is required in order to add LAs as a new User type to the DPM.

How

This enabling Modification proposes to add LAs to the DPM to allow Data Services Contract Management Committee to determine which data items can be provided.

2 Governance

Justification for Self-Governance

This is an enabling Modification only, which is proposed as Self-Governance as it will not impact competition, discriminate between users, or have a negative impact on consumers.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup.

3 Why Change?

LAs have an ambition to lead the reduction of carbon emissions in their locality, often to meet net zero target dates that are accelerated ahead of the UK's legally binding target date of 2050. They are putting into place, plans to drive emissions reductions and want to be able to track progress against their carbon reduction goals. They also want to target engagement with consumers to change behaviours which could lead to a reduction in emissions.

LAs have approached Cadent and asked us to work alongside them to support their carbon emission reduction goals by providing access to information that helps them target reduction strategies and provide visibility on what progress they are making against their goals. Electricity Distribution Network Operators are currently working closely with LAs to provide similar information.

LAs would like to understand their largest gas users so that they can approach, and work with them on decarbonisation strategies. They are also keen to have the ability to assess the outcome of their interventions year on year to demonstrate progress on gas reduction usage over time. Tracking consumption over time will give them an indication of whether their carbon emissions reductions strategies are working or not.

LAs are seeking information such as business names/addresses, customer type (commercial/industrial) and their annual gas usage in kwh. They are also asking for post code level gas usage for all users.

Without access to the required data, LAs will not be able to work with their largest gas users on decarbonisation plans and subsequently will not be able to see if their interventions on properties (insulation, etc) is showing any benefit.

If access to the required data is not forthcoming there is the possibility that the gas industry may be seen as a blocker to carbon emissions reductions. We are also aware that it is proposed within the REC v3 Data Access Schedule that Local Authorities will be permitted access to data via both the Electricity and Gas Enquiry Services.

4 Code Specific Matters

Reference Documents

The Data Permission Matrix (which includes the Conditionality Document) is published on Xoserve.com.

Knowledge/Skills

None identified.

5 Solution

This Modification will add LAs to the Data Permission Matrix.

For the avoidance of doubt, requests to access UK Link Data and issues regarding how released data is used and any controls required to mitigate against misuse, are managed through the Data Services Contract Management Committee and third-party services contract between Xoserve and the LAs and are not included in the scope of this Modification.

6 Impacts & Other Considerations

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

None identified.

Consumer Impacts

Data relating to all consumers groups would be available if specified in the reporting and sanctioned by Data Services Contract Management Committee.

Potential for reduction in end user energy costs if gas reduction strategies are successful.

What is the current consumer experience and what would the new consumer experience be?

This enabling Modification would allow LAs access to Consumer information to enable collaborative working with the aim of reducing carbon emissions to the benefit of UK Plc and therefore all consumers.

Impact of the change on Consumer Benefit Areas:	
Area	Identified impact
Improved safety and reliability	None
Lower bills than would otherwise be the case The purpose of the Modification is for LAs to discuss decarbonising schemes with large consumers which will include reduced gas usage (better insulation etc)	Positive
Reduced environmental damage The primary purpose of the Modification is to provide LAs with the data necessary for them to have discussions with Large Users on how best to decarbonise to meet the UK's 2050 Net Zero ambitions.	Positive
Improved quality of service Insert text here	None
Benefits for society as a whole The Modification will assist <u>UK Plc in meeting its 2050 Net Zero targets.</u>	Positive

Cross Code Impacts

An equivalent IGT UNC Modification has been raised (Modification number IGT157). A Workgroup Participant noted that they believed the two Modifications are not dependent on each other. It is expected that both Modifications would however be implemented together wherever possible.

EU Code Impacts

None.

Central Systems Impacts

No impacts to Central Systems envisaged in providing required data which is sanctioned for release following approval at Data Services Contract Management Committee.

Workgroup Impact Assessment

No ROM is required for this Modification.

A Workgroup Participant noted that there may be some concern that Local Authorities could potentially utilise the data to measure the performance of business and therefore be able to penalise them if targets aren't being met. This however cannot happen directly after this Modification. Stakeholder engagement is required for

business to give permission for the release of their data. The controls and assurances in the CDSP processes guard against this. Workgroup requested assurance from the CDSP in this regard who supplied the following response, which was discussed at Workgroup on 22 July 2021:

Where a service is provided under a third party contract between Xoserve and the customer the contract will specify the permitted purpose of access to data as well as the method of delivery and the duration. The contract will include robust data protection clauses that align with data protection legislation and which shall include a warranty from the customer that it has a lawful basis for the processing of personal data.

A Workgroup Participant noted that there is no mention of indemnity to ensure that it is the Local Authority which would be liable (not the CDSP) in the case of any possible future come back. A CDSP representative noted that this will be covered through the DSC Processes (through the Data Request Report DRR).

Consumer Impacts

In addition to the consumer benefits outlined above by the Proposer, Workgroup added the following:

Consumer Impact Assessment <i>(Workgroup assessment of proposer initial view or subsequent information)</i>	
Criteria	Extent of Impact
Which Consumer groups are affected?	All consumer groups could potentially be affected, though it appears that initially at least, large consumers would be targeted first.
What costs or benefits will pass through to them?	Local Authorities wish to know who they should speak to in their local area to assist with progress to decarbonisation as a means to travel towards net zero. This is related to provision of information. In the wider context this is a global and local benefit. There are no direct costs associated with this Modification.
When will these costs/benefits impact upon consumers?	Upon implementation, subject to subsequent passage through DSC procedures.
Are there any other Consumer Impacts?	None
General Market Assumptions as at December 2016 (to underpin the Costs analysis)	
Number of Domestic consumers	21million
Number of non-domestic consumers <73,200 kWh/annum	500,000
Number of consumers between 73,200 and 732,000 kWh/annum	250,000
Number of very large consumers >732,000 kWh/annum	26,000

7 Relevant Objectives

Impact of the Modification on the Transporters' 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

This Modification provides a more efficient means for the CDSP to release data to LAs consistent with the principle of development of the DPM. This is consistent with other similar changes for the release of Data to identified organisations listed in the DPM, with the actual data to be released to be agreed via the process established by the Data Services Contract Management Committee and therefore further Relevant Objective *f) Promotion of efficiency in the implementation and administration of the Code.*

Workgroup Participants agreed with the Proposer's assertion above in relation to Relevant Objective *f)* and noted that this argument is consistent with previous enabling Modifications relating to the addition of a new User Type to the DPM.

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.

Workgroup Participants noted that it appears to make sense to try and implement both this Modification and the IGT Modification 157 in tandem where possible.

9 Legal Text

Text

No Legal Text is required as this is simply an enabling Modification as required by TPD V5.5.2(j).

10 Consultation

Panel invited representations from interested parties on 19 August 2021. The summaries in the following table are provided for reference on a reasonable endeavours' basis only. It is recommended that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Implementation was unanimously supported in the two representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
Cadent	Support	f) - positive	<ul style="list-style-type: none"> • Supportive of this modification which would allow the CDSP to release data to Local Authorities once they have been added to the DPM and have agreed and signed the necessary third-party services contract. Local Authorities require data to allow them to engage with larger consumers in order to help them fulfil their Net Zero ambitions. • In addition, the modification would align the UNC with the REC v3 Data Access Schedule regarding the provision of information to Local Authorities. • Implementation should be 16 business days after a Modification Panel decision to implement, subject to no Appeal being raised. • No impacts to costs identified. • Note that this is an enabling modification only, required as per UNC TPD V5.5.2(j), and therefore no Legal Text is required.
NGN	Support	f) - positive	<ul style="list-style-type: none"> • Support this enabling modification as they agree the addition of the Local Authorities to the DPM could help these organisations with data around consumers gas usage in relation to, amongst other things, the move towards Net Zero. Any data provided should only be done so having been subject to the DSC Contract Management Committee approval and should take into account whether the relevant confidentiality agreements are in place. NGN believe all data provided under this service to Local Authorities should be as a chargeable service.

		<ul style="list-style-type: none"> • Agree this proposal should follow Self-Governance procedures as it only seeks to add Local Authorities to the DPM and proposes no changes to the UNC or party obligations, systems or processes, and could be implemented 16 business days after Modification Panel approval, subject to no appeal being raised. • Identified no analysis or development required and no ongoing costs incurred as a result of this proposal.
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Please note that late submitted representations will not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

11 Panel Discussions

Discussion

The Panel Chair summarised that Modification 0769S was an enabling Modification which would amend the UNC Data Permissions Matrix (DPM) to add Local Authorities (LAs) as a new User type.

Panel Members considered the representations made noting that implementation was unanimously supported in the two representations received.

Panel Members agreed with the Proposer and the other respondent that this Modification would:

- Add Local Authorities (LAs) as a new User type into the UNC Data Permissions Matrix (DPM) which will allow the DSC Contract Management Committee to discuss and agree the terms and details of the actual release of data.
- In addition, the Modification would align the UNC with the REC v3 Data Access Schedule regarding the provision of information to Local Authorities.

Panel Members noted that the Modification has an identified Cross Code impact and that implementation should be in tandem with IGT Modification 157 where possible. The Implementation date will be stated as “To be Confirmed” by the Transporter.

Panel Members noted that any release of data would be rigorously controlled through the DSC Contract Management Committee. Panel briefly discussed the reasons any Local Authorities are interested in this data, noting that the aim of any Local Authority actions/interventions would be working towards Net Zero. It is likely that any targeted sites would, at least initially, be larger consuming sites. A Panel Member expected that a proper and agreed use case would be required prior to data access agreement being given by the DSC Contract Management Committee.

Consideration of the Relevant Objectives

Panel Members considered Relevant Objective f) *Promotion of efficiency in the implementation and administration of the Code*, agreeing with the Proposer and the respondent that implementation would have a positive impact because the Modification takes the first step in a process which will enable a more efficient means for the CDSP to eventually release data to Local Authorities, subject to the DSC Contract Management Committee discussing and agreeing the terms and details of the actual release of data.

Determinations

Panel Members voted unanimously that no new issues were identified as part of consultation.

Panel Members voted unanimously that Modification 0769S does not have an SCR impact.

Panel Members voted unanimously that Modification 0769S does have a cross code impact (IGT).

Panel Members voted unanimously to recommend implementation of Modification 0769S.

12 Recommendations

Panel Determination

Panel Members agreed that Modification 0769S should be implemented.