

## **iGT UNC Modification Workstream Meeting 17-07**

**Tuesday 4<sup>th</sup> July 2017**

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

<b>Attendee</b>		<b>Organisation</b>	
Steve Ladle	(SL)	Gemserv	Chairman
John Welch*	(JW)	Npower	Item 1 - 5
Claire Towler	(CT)	SSE	
Collette Baldwin	(CB)	E.ON	Item 1 - 5
Katy Carpenter*	(KC)	E.ON	Item 6 only
Andrew Margan*	(AM)	British Gas	
Shanna Key	(SK)	Northern Gas	Item 1 - 5
David Mitchell*	(DM)	Scotia Gas Networks	Item 1 - 5
Paul Orsler	(PO)	Xoserve	
Tahera Choudhry	(TC)	Xoserve	
Adam Pearce	(AP)	ES Pipelines	
Victoria Parker	(VP)	ES Pipelines	
Nicky Rozier	(NR)	BU-UK	
Chris Baker	(CB)	BU-UK	
Bob Fletcher	(BF)	Joint Office	Item 1 - 5
Karen Visgarda	(KV)	Joint Office	Item 1 - 5
Rachel Bird	(RB)	Gemserv	Secretariat

*\*Attended via teleconference*

### **1. Welcome and apologies for absence**

The Chair welcomed attendees to the meeting of the iGT UNC Modification Workstream. The Chair welcomed UNC members to the meeting and acknowledged that the meeting would be split into two sections, firstly considering Modifications for Price Comparison website access to DES data, then continuing the iGT agenda for the remainder of the Workstream. Apologies were received from Kirsty Dudley (E.ON).

### **2. Confirmation of Agenda**

The Chair confirmed the items for discussion as outlined in the final agenda. The Chair also noted that there was one additional item of AOB from PO regarding a new modification proposal which would be addressed at the end of the meeting.

### 3. Approval of the Previous Minutes

Attendees reviewed the minutes from the Modification Workstream meeting held on 6<sup>th</sup> June 2017 (17-06). There were additional comments received prior to the meeting which the Code Administrator had incorporated into the draft minutes. These included a small amendment to the attendees list. The minutes were agreed and approved as a true and accurate record of the meeting.

### 4. Outstanding Actions

Please refer to the table in Appendix 1 at the end of the minutes for updates on actions arising.

#### Action 17/06-02

NR noted that the issue of CSEP NExA Table property types was taken back to the GEG group for further discussion amongst the iGTs at the last AiGT meeting. NR continued that a report has been drafted to all iGTs to outline the suggestions made at the previous Modification Workstream meeting and NR is currently awaiting feedback on this report. Therefore, NR requested that this action be carried forward to the August Workstream meeting.

The Workgroup noted the update.

### 5. iGT095/UNC593 – Joint Workgroup

<https://www.gasgovernance.co.uk/0593/040717>

The full discussion for the Modification Workgroup can be found on the Joint Office website by following the above link. Below is a summary of the Workgroup discussions.

A further variation request was reviewed by the Workgroup which highlighted changes made to the modification based on comments and suggestions made in the meeting on 22nd June 2017. These included taking out redundant references to TPIs which was deemed by the Workgroup to be included in the definition of PCWs (including that only access should be given to internet based TPIs). Moving elements from the solution into the 'Why Change' section and changes to the legal text with regards to defined terms of the data items.

The Workgroup gave feedback to questions which were posed by Ofgem in their send-back letter. This included addressing issues around who the 'Data Controller' is. The Workgroup could not agree on who the data controllers are. However, the Workgroup concluded that Shippers and Suppliers are not directly the Data controllers with respect to the provision of providing data to PCWs.

TC noted that access to the data would be managed through a proposed API (Application Programming Interface) solution and potential interim telephone service and with contractual obligations set out in a third-party agreement between Xoserve and individual PCWs. Such arrangements would fall under the governance of the DSC Change/Contract Management Committees and is out of the scope of this modification.

The Workgroup identified a risk should the CDSP fail its obligations and incur a liability with regards to Data Protection breach. TC noted that any financial liability will be passed directly to CDSP customers as a result of the DSC arrangements.

The Workgroup raised concerns that the modification will potentially be implemented before a robust solution is available for industry to review via DSC arrangements. The Workgroup resolved to recommend the following;

- The Workgroup also suggests that the PIA be included as an appendix to the Draft Modification report and to be considered alongside this at consultation.
- Some parties of the Workgroup have concerns that original views raised during the initial consultation on DPA risks are still relevant due to the stage of development of the API solution. It is therefore questioned whether this modification should progress further until the technical solution and third party arrangements have been sufficiently developed and DPA risks have been fully understood.
- The Workgroup suggests to Panel that it seeks a recommendation from the DSC Committee before sending the modification out for consultation on whether it considers the technical solution and third party arrangements are suitable to mitigate the risks concerning DPA in previous consultations.

For the iGT modifications, the Workgroup agreed that the Workgroup Report could be finalised and submitted to the July Panel. However, it requested that an updated version of the Privacy Impact Assessment (PIA) be included with the Draft Modification report to be consulted on at the same time.

**Action MWS17/07-01: Code Administrator to finalise the Workgroup report and submit to the July Panel for decision on a Consultation.**

TC introduced a document which summarised the consultation responses received from the short PIA consultation. TC addressed the concerns that respondents had highlighted through the consultation process, particularly around GDPR issues. TC assured the Workgroup that explicit consent would be obtained through a tick box on PCW websites. This would be audited before PCWs were granted access to the API solution.

TC resolved to take away all comments with regards to the PIA and amend the PIA document to be included in the industry consultation of both iGT095VV and UNC593. It was also agreed that the PIA may be further developed by the DSC Change/Contract Management Committees, however, the Workgroups role in the development of the document ends with the submission of the Workgroup report to their respective Panels.

**Action MWS17/07-02: TC to amend PIA document incorporating comments made in the Consultation process. TC to send the amended PIA to the CA for circulation alongside the Draft modification report for consultation subject to Panel approval.**

## 6. iGT100 – Reinstating Asset Query Codes

The Chair introduced the modification proposal to the Workgroup. This modification was sent to a Workgroup by the Panel to discuss issues around query codes being reinstated and around Self-Governance concerns.

iGTs did not feel that it was necessary to bring back address query codes within the MAM process as this now goes through the UK-Link system and may add a level of confusion to how address queries should be handled. This was also discussed at the Panel meeting and KC resolved to take this code out of the modification proposal as it had been a late addition.

AM noted that there may be a conflict with Commercial MAMs who do not have the same automated mechanism to raise queries. However, the majority of the Workgroup supported the proposer's view that in order to have adequate measures in place, and a clear route of escalation these query codes should be reintroduced and codified. However, it was identified that most queries are currently handled manually via email. AP queried whether commercial MAMs would actually challenge the reinstating of query codes. The Chair resolved that these concerns could be voiced through the consultation process.

**Action MWS17/07-03: Code Administrator to finalise the Workgroup report and submit to the July Panel for decision on a Consultation.**

## 7. Known Issues Register

None.

AP noted that it would be pragmatic to review the known issues register at the next Workstream to address and resolve issues listed.

## 8. AOB

PO introduced a new modification proposal regarding bringing a new dataset validation process into the iGT UNC. PO also indicated that he would be seeking a proposer for the modification. The modification seeks to ensure parity between both the iGT UNC and UNC, for the treatment of iGT Supply Meter Points, to improve the completeness of the data held within the Supply Point Register on behalf of industry parties by carrying out a MPRN portfolio reconciliation between Shipper records and CDSP systems.

Where any iGT Supply Meter Points are being billed by Suppliers but not registered to a Shipper on the CDSP systems, there is at present no requirement for Shippers or the CDSP to conduct an exercise to monitor such sites, despite there being a specific responsibility to perform such an activity for sites held on the Distribution Networks. This disparity has the potential to create unidentified gas and not delivering the correct allocation of costs despite supply arrangements being in place.

This process is currently running annually in the UNC and Xoserve intend to conduct the next dataset analysis in November 2017.

RB commented that the next iGT UNC code release is scheduled for the end of November, PO noted that the dataset analysis could be brought in line with the code release if necessary.

The Chair suggested that this process could be carried out without changing the iGT UNC code as the section added by UNC0431 does not exclude iGTs.

PO resolved to consider the UNC text again to ascertain whether this Modification is needed.

AP added that if the modification needs to be progressed, ESPUG would be happy to sponsor it throughout the process.

**Action MWS17/07-04: PO to review the UNC code before progressing this proposal and consider whether a modification is needed to the iGT UNC.**

**The next iGT UNC Modification Workstream Meeting is on 1<sup>st</sup> August 2017.**

## Appendix 1

MWS17/06-01	6 <sup>th</sup> June 2017	PO to request the API Solution presentation to be taken to the next Joint Workgroup for iGT095/UNC593.	PO	Closed.
MWS17/06-02	6 <sup>th</sup> June 2017	NR to take the issue of the CSEP NExA property types back to the AiGT and report back to the next Workstream.	NR	Carried forward to the August Workstream meeting.
<b>MWS17/07-01</b>	<b>4<sup>th</sup> July 2017</b>	<b>Code Administrator to finalise the Workgroup report and submit to the July Panel for decision on a Consultation.</b>	<b>CA</b>	<b>New</b>
<b>MWS17/07-02</b>	<b>4<sup>th</sup> July 2017</b>	<b>TC to amend PIA document incorporating comments made in the Consultation process. TC to send the amended PIA to the CA for circulation alongside the Draft modification report for consultation subject to Panel approval.</b>	<b>TC</b>	<b>New</b>
<b>MWS17/07-03</b>	<b>4<sup>th</sup> July 2017</b>	<b>Code Administrator to finalise the Workgroup report and submit to the July Panel for decision on a Consultation.</b>	<b>CA</b>	<b>New</b>
<b>MWS17/07-04</b>	<b>4<sup>th</sup> July 2017</b>	<b>PO to review the UNC code before progressing this proposal and consider whether a modification is needed to the iGT UNC.</b>	<b>PO</b>	<b>New</b>