










IGT UNC Request Workgroup Report		At what stage is this document in the process?
<h1>RG003:</h1> <h2>Review of data permission provisions within the IGT UNC</h2>		<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p>Purpose of Modification:</p> <p>This Proposal seeks to undertake a review of data permission provisions within the IGT UNC and produce a summary of the Workgroups findings to the IGT UNC Panel for consideration.</p>		
	<p>The Workgroup recommends that this modification should:</p> <ul style="list-style-type: none"> be subject to self-governance procedures proceed to Consultation be implemented <p>The Panel will consider this Workgroup Report on 20th June 2018. The Panel will consider the recommendations and determine the appropriate next steps.</p>	
	<p>High Impact:</p> <p>TBC</p>	
	<p>Medium Impact:</p> <p>TBC</p>	
	<p>Low Impact:</p> <p>TBC</p>	

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About this document:		 IGTUNC@Gemserv.com
<p>This document is a Workgroup report which concludes Review group 003. This will be presented by the Proposer to the panel on 20th June 2018.</p> <p>The Panel will consider the Workgroups recommendations and conclusions with respect to any subsequent modifications needed in light of the review groups findings.</p>		 02070901044
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1 Request Summary

Why is the Request being made?

IGT UNC does not currently specify the permission to share IGT Supply Meter Point data with Meter Asset Managers, Meter Asset Providers, Performance Assurance Framework Agreement, Energy Theft and Tip Off Service, or Theft Risk Assessment Service. The larger Gas Transporter Uniform Network Code enables the Central Data Service Provider to provide specific data items to the parties mentioned above, on behalf of larger Gas Transporters and Shippers.

Following implementation of Project Nexus, IGTs became signatories to Central Data Service Provider arrangements, with all IGT Supply Meter Points being recorded and administered with a consolidated central system.

Recent industry initiatives have seen a requirement to extend IGT UNC data provisions to additional industry parties such as Price Comparison Websites, Performance Assurance Framework Agreement and Suppliers. We believe it is an appropriate time to undertake a wider review data permission provisions in the IGT UNC, to assess whether the treatment of IGT Supply Meter Points affords the right level of cover to those involved parties, and ensures sites contained within IGT portfolios are equitably treated as those which reside on larger Gas Transporter networks.

Scope

It is proposed the scope of this review will be IGT UNC Section K (General), and its alignment to equivalent data permissions in place under UNC TPD Section V (General). The Proposer notes that Section K part 23 'Information and Confidentiality' and Section K part 24 'Terms of permitted disclosure' as being the primary area of focus as part of this review.

The Workgroup will be asked to assess these Sections against equivalent provisions as described in UNC Section V (detailed below);

- 5.4 – Terms of Permitted Disclosure
- 5.5 – Exceptions
- 5.11 – Disclosure of Supply Meter Point Information
- 5.15 – Disclosure of Historic Supply Meter Point Asset and Read Information
- 5.16 – Disclosure of Meter Asset Provider Information
- 14 – Theft of Gas
- 15 – Gas Safety Visits
- Annex's V-5, V-6, V-7, V-8, V-9, V-11, V-12

Impacts and Costs

No impacts or costs are envisaged to be incurred as a result of this work undertaken by this Request Proposal.

Recommendations

The objective of this Request Proposal is to produce a recommendation to the IGT UNC Modification Panel. It should be referred to a Workgroup as this will enable a thorough and collaborative review of

provisions, and enable a consolidated recommendation to be provided to the IGT UNC Panel based on industry input.

2 Impacts and Costs

Consideration of Wider Industry Impacts

Impacts

Impact on Central Systems and Process	
Central System/Process	Potential impact
UK Link	<ul style="list-style-type: none"> n/a
Operational Processes	<ul style="list-style-type: none"> n/a

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> n/a
Development, capital and operating costs	<ul style="list-style-type: none"> n/a
Contractual risks	<ul style="list-style-type: none"> n/a
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> n/a

Impact on Transporters	
Area of IGT business	Potential impact
System operation	<ul style="list-style-type: none"> n/a
Development, capital and operating costs	<ul style="list-style-type: none"> n/a
Recovery of costs	<ul style="list-style-type: none"> n/a
Price regulation	<ul style="list-style-type: none"> n/a
Contractual risks	<ul style="list-style-type: none"> n/a
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> n/a
Standards of service	<ul style="list-style-type: none"> n/a

Impact on Code Administration	
Area of Code Administration	Potential impact

Impact on Code Administration	
Modification Rules	<ul style="list-style-type: none"> n/a
IGT UNC Panel	<ul style="list-style-type: none"> n/a
General administration	<ul style="list-style-type: none"> n/a

Impact on Code	
Code section	Potential impact
	<ul style="list-style-type: none"> n/a

Impact on IGT UNC Related Documents and Other Referenced Documents	
Related Document(s)	Potential impact
	<ul style="list-style-type: none"> n/a
	<ul style="list-style-type: none"> n/a

Other Impacts	
Item impacted	Potential impact
Security of Supply	<ul style="list-style-type: none"> n/a
Operation of the Total System	<ul style="list-style-type: none"> n/a
Industry fragmentation	<ul style="list-style-type: none"> n/a

Workgroup Impact Assessment

XXX

3 Terms of Reference

Background

As outlined above, it is proposed to conduct a review of data permission provisions within the IGT UNC, as outlined in Section K. This will be informed by undertaking a comparison exercise against equivalent data permission provisions as defined within Uniform Network Code, Section V (General).

Topics for Discussion

- Understanding the objective
- Assessment of legal text
- Identify the benefit of alignment of data permissions
- Identify any necessary access rules needed for third parties

- Assessment of means to achieve the objective
- Assessment of potential impacts of the Review
- Development of solution and appropriate course of action to be taken forward (including business rules if appropriate)

Outputs

Produce a Workgroup Report for submission to the IGT UNC Modification Panel, containing the assessment and recommendations of the Workgroup including a draft Modification Proposal where appropriate.

The Workgroup Report should consider the following:

- Review of available options;
- Assessment of option benefits from an industry perspective;
- Consideration of any identifiable risks, issues and dependencies

Composition of Workgroup

The Workgroup is open to any party that wishes to attend or participate. A Workgroup meeting will be quorate provided at least two Pipeline Operator and two Pipeline User representatives are present.

Meeting Arrangements

Meetings will be administered by Gemserv and conducted in accordance with the Code Administration Code of Practice.

Review Group meetings

The Review Proposal was discussed at Workstream meetings held on the 6th March 2018, 3rd April 2018, 1st May 2018 and 6th June 2018. At the first meeting the workgroup carried out a preliminary review by comparing Section K of the IGT UNC and Section 5 of the UNC.

The areas identified as a concern were;

- Consumers;
- Contractor or Agent;
- SPAA;
- ETTOS;
- TRAS
- Annex V5;
- Theft of Gas; and
- Gas Safety Visits.

It was agreed that a paper would be prepared to give more detail about how the 2 Codes handled the various areas by annotating for each area the drafting for the UNC and where it existed the drafting in the IGT UNC together with any other drafting in the IGT UNC that may be relevant to a particular permissions area.

At the meeting on the 3rd April the group reviewed this paper and requested additional information be provided to assist the decision making. This additional information should include any licence obligations connected to the data permission and whether these are applicable to IGTs. It should also include any confidentiality mechanisms in place to control who can access the data and for what use, contracts in

place, as well as who the 'User' is for each permission. Paul Orsler (Xoserve) agreed to produce this paper.

At the meeting on the 1st May 2018, the [Xoserve paper](#) was reviewed in ([see meeting minutes for the full detail of the review](#)) and agreed the following for each permission:

Price Comparison website (PCW) and Third-Party Intermediary (TPI) access

- Concluded that there were no further actions needed to cover this section.

Performance Assurance

- Concluded that there were no further actions needed to cover this section.

Smart Meter Data

- Concluded that there were no further actions needed to cover this section.

Meter Asset Providers

- Concluded that there were no further actions needed to cover this section.

Domestic Consumer (or person acting on behalf of Domestic Consumer)

- Concluded that there is no equivalent IGT UNC reference covering the provision of Consumer data which is a licence obligation is included in the GT Licence Condition A31. It was noted that if Xoserve were approached by a Consumer or a person acting on behalf of a Consumer for information Xoserve would currently be obliged to give that particular data.
- IGTS to review and agree whether a modification is required

Data Enquiry

- It was noted that there is no equivalent IGT UNC reference covering the provision of access to the Data enquiry service. It was noted that this obligation is included in the Schedule 23 of SPAA and that this is mandatory for all IGTs.
- IGTS to review and agree whether a modification is required

Historic Supply Meter Point and Read Information

- It was noted that there is no equivalent IGT UNC reference covering the provision of access to the historic supply meter point and read information. It was noted that Xoserve currently produces these reports for suppliers and IGT data is included in these reports.
- The Workgroup discussed the current arrangements and resolved that this should be included in a modification as there is no current IGT UNC governance around this.

Theft of Gas (TOG) reports

- It was noted that there is no equivalent IGT UNC reference covering the provision of access to TOG reports. Further the obligation around TOG reporting is included in a closed schedule of SPAA and Xoserve does not include IGT data in the report and that this is produced on an aggregate. It was also noted that there is no specific service to cover this reporting included in the DSC contract, however, there is a general clause which states that 'the CDSP will product reports in order to fulfil the GT licence conditions'.
- IGTS to review and agree whether a modification is required.

Gas safety reports

- Workgroup concluded that there is no obligation on the IGTs to produce these and therefore no further action is required.

Energy Theft Tip Off Service (ETTOS)

- It was noted that IGTs are now mandated to share data with ETTOS following SPAA CP17403 (February 2018) in schedule 37.
- IGTS to review and agree whether a modification is required.

Theft Risk Assessment Service (TRAS)

- It was noted that there is no equivalent IGT UNC reference covering the provision of access to the data for TRAS and that this obligation is included in the Schedule 34 of SPAA which is not mandatory for IGTs. However, the report supplied to TRAS is a full portfolio cut and therefore IGT meter points may be included in these reports.
- IGTS to review and agree whether a modification is required.

MAM Access to Data

- It was noted that there is no equivalent IGT UNC reference covering the provision of MAM access to data. The service provision is included in the DSC third party service agreement and there is some IGT UNC text, however, it does not directly reflect the text included in the UNC.
- IGTS to review and agree whether a modification is required

To support the above, the IGTs agreed to meet and produce a report back to the Code Administrator by no later than the 22nd May 2018. This report would then be reviewed by the group at the meeting on the 6th June 2018 with an expectation that the Review Group could summarise its findings and produce the Review Group report for consideration at the June Panel.

Meeting held on the 6th June 2018

XXX

4 Modification(s)

Potential Modifications needed

XXX

5 Recommendation

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

- XXXX

Workgroup Comments

XXX