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Final Modification Report	At what stage is this document in the process?
# IGT111: ## Updating of the IGT UNC data permissions	01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification Report

Purpose of Modification:

The purpose of this modification is to align the current IGT UNC data permission provisions following the outcome of Review Group 003.

	Panel consideration is due on 19th September 2018 *(delete as appropriate following Panel's decision)* The Panel determined that this fast track self-governance modification be implemented.
	(delete as appropriate following Panel's decision) The Panel determined that this fast-track self-governance modification should not be implemented.
	High Impact: N/A
	Medium Impact: N/A
	Low Impact: IGTs, Shippers, CDSP

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Timeline

The Proposer recommends the following timetable:

Draft Modification Report issued for consultation	20th July 2018
Consultation Close-out for representations	10th August 2018
Variation Request presented to Panel	N/A
Final Modification Report available for Panel	5th September 2018
Modification Panel decision	19th September 2018

Any questions?

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1 Summary

What

There are differences between some of the current IGT UNC data permission provisions and the UNC, for example, the IGT UNC does not currently specify the permission to share some 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. However, the larger Gas Transporter Uniform Network Code (UNC) enables the Central Data Service Provider (CDSP) to provide specific data items to the parties mentioned above, on behalf of larger Gas Transporters and Shippers.

Therefore, this change is seeking to amend data permissions or add permissions where they are missing from the IGT UNC to mirror the equivalent provisions stipulated in the UNC.

Why

As part of Review Group 003 the group assessed and determined which data permission provisions of IGT UNC Section K (General) need to be amended or added in line with the equivalent data permission provisions currently in place under UNC TPD Section V (General).

These changes would ensure drafting cross code is aligned and makes it clear what data can be shared between parties via the CDSP.

How

We have suggested edits to the legal text so that the IGT UNC mirrors the provisions outlined in the UNC.

2 Governance

Justification for Self-Governance or Fast Track Self-Governance Procedures

This change should be classed as Self-Governance as it does not propose any changes which would have a material impact to Parties in relation to the future of gas consumers, competition in shipping or security of the network. The proposal is adding clarity and should therefore be Self-Governance as it is more in keeping with a housekeeping change.

Requested Next Steps

This modification should:

- proceed to Consultation

3 Why Change?

Review Group RG003 conducted an assessment of all the current data sharing permissions in place via the CDSP to establish if they had all appropriate permissions. The RG003 Work Group Report (see below) outlines all permissions reviewed and which do and don't have adequate permissions in place.

This modification is seeking to address the missing permissions for the following:

- Smart Meter Data
- Domestic Consumer (or person acting on behalf of Domestic Consumer)
- Historic Supply Meter Point and Read Information

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- Theft Risk Assessment Service (TRAS)
- MAM Access to Data

The Review Group's assessment outlined that it recommended the permissions are added into the IGT UNC to give clear and robust notification of what can be shared between parties via the CDSP. These are only deemed to be housekeeping amendments as the reporting is already in place (nothing new) and therefore it would be good governance to add this into the IGT UNC.

An additional benefit of this modification is the permissions which are seeking to be implemented are already in the UNC and would therefore ensure that robust cross code drafting is implemented.

This modification is only seeking to deliver the outcomes from the RG003 final report.

4 Code Specific Matters

Technical Skillsets

No technical skillset will be required as this is a code specific matter.

Reference Documents

RG003 Review Group Request

RG003 Request Workgroup Report

5 Solution

Following the output from RG003, the IGT UNC Section K permissions below will need to be amended as follows:

Domestic Consumer (or person acting on behalf of Domestic Consumer) (Section K 23.4)

- The RG003 group determined that text which mirrors the UNC to replace what is already in the IGT UNC would be more appropriate.
- UNC Text is currently:
  5.5.3(f) to a 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 pursuant to Standard Special Condition A31((2)(d)(ii) where its application is for the receipt of data for change of supplier purposes;

Smart Meter Data (Section K 23.6)

- All references to 'Pipeline Operator' in IGT UNC shall be amended to 'CDSP' to align to the UNC.
- UNC Text is currently:
  The CDSP is authorised to disclose such data as is set out within Annex V-10 to the holder of the "smart meter communications licence" as defined by Statutory Instrument 2012 No.2400: The Electricity and Gas (Smart Meters Licensable Activity) Order 2012.
  Such data may relate to all Supply Meter Points regardless of status and includes Supply Meter Points which are located on the network of an Independent Gas Transporter where provided to the CDSP

MAM Access to Data (Section K 40.1)

- The RG003 group determined that text which mirrors the UNC to replace what is already in the IGT UNC would be more appropriate.
- UNC Text is currently:
  5.11 Disclosure of Supply Meter Point Information (Annex V-5)
  5.11.1 Where in respect of any Supply Point the CDSP is requested by a Registered Metering Applicant to disclose to such Registered Metering Applicant the information detailed in Annex V-5 ("Supply Meter Point Information") then the Registered User of such Supply Point agrees that any

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such request will be regarded as made on behalf of such Registered User and accordingly the CDSP is (pursuant to the DSC) authorised by such Registered User to disclose such Supply Meter Point Information to the Registered Metering Applicant in accordance with such request.

5.11.2 For the purposes of paragraph 5.11.1, "Registered Metering Applicant" is any person who is registered to request and receive Supply Meter Point Information from the CDSP or any person who is not currently registered to request and receive Supply Meter Point Information but such request relates to a period when they were previously registered to request and receive Supply Meter Point Information pursuant to an appropriate registration scheme administered by the CDSP.

5.11.3 Where in respect of any Supply Point for which details of the relevant Meter Asset Manager are not populated in the Supply Point Register the CDSP is requested by an

Accredited Meter Asset Manager to disclose information in relation thereto to such Accredited Meter Asset Manager, then provided the Accredited Meter Asset Manager notifies the relevant meter point reference number for each relevant Supply Meter Point comprised within such Supply Point to the CDSP the Registered User of such Supply Point agrees that any such request will be regarded as made on behalf of such Registered User and accordingly the CDSP shall be authorised by such Registered User to disclose the following items of information in respect of each Supply Meter Point comprised in the Supply Point Registration for such Supply Point to the Accredited Meter Asset Manager in accordance with such request:
(a) meter serial number;
(b) supplier; and
(c) model (meter).

5.11.4 For the purposes of paragraph 5.11.3, "Accredited Meter Asset Manager" is a Meter Asset Manager that is listed on the Supply Point Administration Agreement MAM Registration Scheme listing of accredited Meter Asset Managers published by Lloyds Register.

Historic Supply Meter Point and Read Information

- There is no legal text currently in the IGT UNC on Historic Supply Meter Point and Read Information. The RG003 group determined that legal text should be added in the in IGT UNC to mirror the UNC.
- UNC Text is currently:
  5.15 Disclosure of Historic Supply Meter Point Asset and Read Information (Annex V- 8)
  5.15.1 Where in respect of any Supply Point, the CDSP is requested by the Registered User to disclose such historic Supply Meter Point Asset and Read data (the information detailed in Annex V-8 "Historic Supply Meter Point Asset and Read information") then the Registered User of such Supply Points agree that any such request will be regarded as made on behalf of such Registered User and accordingly the CDSP is (pursuant to the DSC) authorised to disclose such Information in accordance with such request.
  5.15.2 Upon a request by any Registered User, the CDSP shall as soon as reasonably practicable provide the Registered User with the details specified in paragraph Annex V-8 in respect of each Supply Point (other than an NTS Supply Point) for which the User is the Registered User (relevant Supply Point) at the date on which the CDSP is in receipt of the User's Request.
  5.15.3 For the purposes of paragraph V5.15.1 and V5.15.2 the period of data provision is three (3) years historical data.

Theft Risk Assessment Service (TRAS)

- There is no legal text currently in the IGT UNC on the TRAS. The RG003 group determined that legal text should be added in the in IGT UNC to mirror the UNC which is pursuant to SPAA.
- UNC Text is currently:
  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;

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6 Impacts & Other Considerations

We do not envision the introduction of these existing permissions into the IGT UNC will have an impact on industry Parties.

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) Co-ordinated, 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 agreements 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 Cooperation of Energy Regulators	None

This change falls within Relevant Objective (F) as it seeks to improve administration by adding clarity to the code.

8 Implementation

We recommend this proposal is implemented in the November 2018 release.

No impacts or costs are envisaged to be incurred as a result of this proposal.

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9 Legal Text

Legal Text comment (provided on behalf of the Pipeline Operators)

In accordance with the recommendations of RG003, the proposed legal text set out below is intended to ensure that requirements that have been developed in the UNC regarding the provision of certain types of information, are also set out fully in the IGT UNC either by replication of the UNC text or by pointing across to the relevant paragraph(s) within the UNC and providing contextual information via the paragraph heading.

The decision as to whether to point across or copy text has been taken on a case by case basis to maximise the readability of the text.

Proposed Legal Text

Domestic Consumer (or person acting on behalf of Domestic Consumer) (Section K 23.4)

23.4 Protected Information to a consumer or an appropriate person to the extent designated by the authority within Standard Special Condition A31 of the Gas Transporter's Licence and a supplier shall be an appropriate person pursuant to Standard Special Condition A31((2)(d)(ii) where its application is for the receipt of data for change of supplier purposes~~relating to a Supply Point may be disclosed to the Supplier or Consumer to the extent reasonably necessary to enable the conclusion and implementation of a contract of sale to the Supplier (where relevant) and a contract of supply to the Consumer.~~

Smart Meter Data (Section K 23.6)

23.6 The ~~Pipeline Operators~~CDSP are authorised to disclose such data as is set out within Annex V-10 of the UNC to the holder of the "smart meter communications licence" as defined by the Statutory Instrument 2012 No.2400: The Electricity and Gas (Smart Meters Licensable Activity) Order 2012. Such data may relate to all Supply Meter Points regardless of status. ~~Pipeline Operators~~ The CDSP are authorised to appoint a third-party agent (i.e. Xoserve) to manage the collation and transmission of the data set out within Annex V-10 of the UNC on to the holder of the "smart meter communications licence".

MAM Access to Data (Section K 40.1)

40 **Disclosure of Supplier Identity to a Registered Metering Applicant**

40.1 Where in respect of any Supply Point the CDSP is requested by a Registered Metering Applicant to disclose information, such disclosure will be carried on in accordance with Paragraph 5.11 of Section V of the UNC

Section M

"Registered Metering Applicant" shall have the meaning ascribed thereto in the UNC;

Historic Supply Meter Point and Read Information

23.10 **Disclosure of Historic Supply Meter Point Asset and Read Information**

23.10.1 Where in respect of any Supply Point, the CDSP is requested by the Registered User to disclose Historic Supply Meter Point Asset and Read Information such disclosure will be in accordance with paragraph 5.15 of Section V of the UNC.

Section M

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"**Historic Supply Point Meter Asset and Read Information**" shall have the meaning ascribed thereto in the UNC;

Theft Risk Assessment Service (TRAS)

Add

24.3 (m) to a person appointed pursuant to the SPAA to provide Theft Risk Assessment Service whereby such disclosure shall be in accordance with paragraph 5.5.3(l) of Section V of the UNC.

Section M

"**SPAA**" shall have the meaning ascribed thereto in the UNC;

"**Theft Risk Assessment Service**" shall have the meaning ascribed thereto in the SPAA;

10 Consultation

Panel invited representations from interested parties by 10th August 2018. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
IPL, QPL, GPL	Support	F - positive	• We support the implementation of IGT111 as believe it will appropriately align permission provisions within Section K of the IGT UNC to Section V of the UNC. • We are satisfied each permission provision has been through a comprehensive review and the recommendations outlined within the review group report are reflected within this modification. • We support enabling the CDSP to provide specific data items to Meter Asset Managers, Meter Asset Providers, Performance Assurance Framework Agreement, Energy Theft and Tip Off Service, or Theft Risk Assessment Service on behalf of the IGTs and believe this modification will better facilitate cross-code parity. • We agree this modification satisfies the self-governance criteria as it does not have a material impact on parties. • We agree this modification should be implemented in the November 2018 release.

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Npower	Support	F - positive	• We believe that it is important to ensure that the IGT UNC is aligned to the UNC. As this modification is seeking to amend data permissions or add permissions where they are missing from the IGT UNC to mirror the equivalent provisions stipulated in the UNC, we support it.
E.ON	Support	F - positive	• We support this modification because it is good governance in seeking to ensure that the drafting cross code is aligned between the IGT UNC and the UNC and makes it clear what data can be shared between parties via the CDSP. • Considering that the data permission provisions already exist in the UNC we believe that the differences outlined in the IGT UNC should be brought in line with the UNC as the reporting already exists and so no new reporting would be required. • We agree that this is a self-governance modification because the changes are seeking to add clarity to the IGT UNC. • We do not believe that there should be any development or ongoing costs associated with this modification as the amendments are not material and the data permissions are being aligned to those already in place in the UNC. • We believe this modification should be implemented in November 2018 as there are no system changes required and is only amending the wording of the provisions in the IGT UNC in line with the provisions in the UNC.
ESPUG	Support		• ES Pipelines Agrees with the proposer of this modification, that Section K of the IGT UNC should be amended in line with the provisions set out under the UNC. This will ensure that it is clear what data can be shared with the CDSP by IGT UNC Parties. • Clarifying UNC data permissions can only benefit smooth data flows between industry parties. This in turn will benefit consumers that will not experience any potential and consequential problems that occur due to poor or no clarity regarding permissions. • We think this proposal is consistent with the

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			general political and climate regarding information after the introduction of the GDPR. In particular this observation relates to the general importance of trust that is connected to the fair processing and transfer of information.

In summary:

- Four responses were received to the consultation for IGT111, incorporating two responses from Pipeline Users, two responses from Pipeline Operators.
- All respondents offered support to this modification.
- Respondents agreed that the Modifications better facilitated Relevant Objective F) Promotion of efficiency in the implementation and administration of the Code.
- All respondents agreed that the Modifications did meet the criteria for Self-Governance.
- All respondents agreed that the proposed Legal Text supported the requirements of the solution.
- Respondents noted that the next suitable opportunity for implementation would be the November 2018 release.

11 Panel Discussions

The Code Administrator will provide a summary of the Panel discussions that inform any decisions taken. This will include a record of Panel's views on the representations, the outcome of any votes and, where alternates exist, Panel's preference.

Discussion

Insert text here

Consideration of the Relevant Objectives

Insert text here

Determinations

Insert text here

12 Recommendations

Panel Determination Fast Track

Members agreed:

- that Modification 111 should [not] be implemented

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