

| Draft Modification Report | At what stage is this document in the process? |
|--|---|
| <h2>IGT115:</h2> <h3>Update to IGT UNC to formalise the Data Permissions Matrix</h3> | <div style="display: flex; flex-direction: column; gap: 10px;"> <div style="border: 1px solid green; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;">01 Modification</div> <div style="border: 1px solid blue; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;">02 Workgroup Report</div> <div style="border: 1px solid purple; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;">03 Draft Modification Report</div> <div style="border: 1px solid orange; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;">04 Final Modification Report</div> </div> |
| <p>Purpose of Modification:</p> <p>This modification seeks to formalise the Data Permissions Matrix within the IGT Uniform Network Code (UNC) and ensure consistency between IGT UNC and the UNC.</p> | |
|  | <p>This Draft Modification Report is issued for consultation responses at the request of the Panel. All parties are invited to consider whether they wish to submit views regarding this self-governance modification.</p> <p>The close-out date for responses is 10th October 2018, which should be sent to IGTUNC@Gemserv.com. A response template, which you may wish to use, is at the IGT UNC website.</p> <p>The Panel will consider the responses and agree whether or not this self-governance modification should be made.</p> |
|  | <p>High Impact: None</p> |
|  | <p>Medium Impact: None</p> |
|  | <p>Low Impact: Shippers and Transporters</p> |

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| Timetable | |
| The Proposer recommends the following timetable: | |
| Initial consideration by Workgroup | 4 th September 2018 |
| Amended Modification considered by Workgroup | dd month year |
| Workgroup Report presented to Panel | 19 th September 2018 |
| Draft Modification Report issued for consultation | 21 st September 2018 |
| Consultation Close-out for representations | 12 th October 2018 |
| Variation Request presented to Panel | dd month year |
| Final Modification Report available for Panel | 7 th November 2018 |
| Modification Panel decision | 21 st November 2018 |

 Any questions?

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Workgroup Comments

The Workgroup reviewed the suggested timetable for the progression of this modification and highlighted that this was based on a Self-Governance process. The Workgroup stressed the importance of aligning the implementation of IGT115 and UNC649S and noted that the likely implementation date of this modification would be after the scheduled November release date. The Workgroup were satisfied with the timetable proposed for this Modification. However, it recommended that the Panel could consider delaying the date of the November release to 9th or 10th of November to accommodate this modification and eliminate the need for an extraordinary release if this modification is implemented.

1 Summary

What

Currently the data that can be accessed within the Data Enquiry Service (DES) by a User and a User's access type is illustrated within the DES Permissions Matrix which forms part of the UK Link Manual. UNC modification 0649 - Update to UNC to formalise the Data Permissions Matrix - seeks to formalise the matrix within the Uniform Network Code (UNC) and extend it to include other request / respond services. Since these services provide data items that are common across all Transporters including IGTs an equivalent IGT UNC modification is required to ensure that this is reflected in the IGT UNC.

Why

The DES Permissions Matrix currently details the User groups who can access DES and the data fields they have permission to view. This was incorporated into the UK Link Manual following the UK Link Manual review. This was approved by the Change Management Committee and is available for Users to view within the UK Link SharePoint site.

UNC modification 0649 has been raised to formalise the Data Permissions Matrix in the UNC and extend them to include other request / respond services where data is provided such as the Application Programmable Interfaces (APIs) and the telephone service. This modification seeks to reference the Data Permissions Matrix (which will incorporate the existing DES Permissions Matrix) within K24.3 of the IGT UNC. This modification also details how this Data Permissions Matrix can be updated to add or amend the data field and/or permissions that parties can access within the data services within the scope of the Data Permissions Matrix.

How

This modification seeks to implement within IGT UNC arrangements equivalent to those being proposed as part of UNC Modification 0649 'Update to UNC to formalise the Data Permissions Matrix'.

The solution is an update to IGT UNC K24.3 to permit the release of data in line with the Data Permissions Matrix. It is proposed that the DSC Contract Management Committee as described within GT D – CDSP and UK Link – is utilised to approve proposals brought by the CDSP to amend the data fields and/or permissions against each service.

2 Governance

Justification for Self-Governance Procedures

This modification seeks to formalise the multi service Data Permissions Matrix within the IGT UNC and stipulates the process for adding or amending the data fields and/or permissions going forward. It proposes to extend the services included within this to describe other services where data is made available to users.

This requires an addition to the legal text in IGT UNC K24.3 to permit the release of data in line with the Data Permissions Matrix which is part of the UK Link Manual. As a result, it is unlikely to have a material impact on the promotion of efficiency in the implementation and administration of the Code or the securing of effective competition.

There is no impact on any of the other Self-Governance criteria.

As such, this is a non-material change to the IGT UNC to formalise the existing DES Permissions Matrix and incorporate additional services into the Data Permissions Matrix, therefore, it is proposed this is processed as a Self-Governance modification.

Requested Next Steps

This modification should:

- be considered a non-material change and subject to self-governance
- be assessed by a Workgroup

Workgroup Comments

The Workgroup agreed with the Proposers view that this Modification should be Self-Governance.

3 Why Change?

Modification 0613S – *Revised UK Link Manual CDSP Data Services Document* was implemented on 13 October 2017. This modification created the UK Link Manual as part of the Data Services Contract (DSC). Following approval at the Change Management Committee (ChMC) meeting in January 2018, the DES Permissions Matrix was incorporated into the UK Link Manual and can be viewed through the UK Link SharePoint site.

The DES Permissions Matrix details the User groups who can access DES and the data fields they have permission to see by User view type.

By expanding the services that are included within this Data Permissions Matrix then greater flexibility and responsiveness could be achieved for the emerging API services that would be expected to be quicker to market for data provision services to users and therefore realise benefits sooner.

It is also proposed that the data items included within the telephone services offered are also included within the Data Permissions Matrix for this same reason.

An equivalent UNC modification (0649 - Update to UNC to formalise the Data Permissions Matrix) has been proposed to formalise the Data Permissions Matrix within the UNC. Through the formalisation of the Data Permissions Matrix within the UNC and IGT UNC, it will permit the release of data in line with the matrix. This modification proposes that the Contract Management Committee approve amendments to the Data Permissions Matrix such as adding new data items to the matrix and defining which services and parties that these items are available to. This modification will improve the efficiency of data governance by reducing the need for IGT UNC modifications, but it is expected that the Contract Managers may still consider that an IGT UNC modification is relevant.

For the avoidance of doubt, any new User type not currently referenced within the Data Permissions Matrix as a current User type e.g. Supplier, Price Comparison Website etc. will require a IUNC Modification to add the new User. This will be the case on all occasions where a new User type seeks access.

4 Code Specific Matters

Technical Skillsets

No specific knowledge or skills required to consider this modification.

Reference Documents

UK Link Change Pack – communication 1816.1 – IM – SN – Data Enquiry Service Permissions Matrix.

5 Solution

IGT UNC K24.3 is amended to formalise the Data Permissions Matrix.

The UNC equivalent modification is expected to insert the reference to the Data Permissions Matrix in the UK Link Manual in GT-D and amend the Change Management Procedures to reference an instruction from Contract Managers to update the Data Permissions Matrix.

For the avoidance of doubt, any new User type not currently referenced within the Data Permissions Matrix as a current User type e.g. Supplier, Price Comparison Website etc. will require a IUNC Modification to add the new User. This will be the case on all occasions where a new User type seeks access.

Workgroup Comments

The Workgroup discussed the additional paragraphs added to the varied modification and were happy that this reflected discussions on how new entrants would be dealt with which were had at the UNC Distribution Workgroup on the 23rd August 2018.

6 Impacts & Other Considerations

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

Neither the SCR nor any significant industry change project is impacted.

Consumer Impacts

No consumer impacts have been identified.

Environmental Impacts

None

Cross Code Impacts

UNC modification 0649 - Update to UNC to formalise the Data Permissions Matrix - has been raised.

EU Code Impacts

No EU Code impacts identified.

Central Systems Impacts

No impact to Central Systems.

Workgroup Comments

The Workgroup agreed with the proposer’s suggestion that there will be no Consumer costs, EU, central systems or environmental impacts resultant of this modification’s implementation. The Workgroup notes that should this Modification be implemented, it is likely to lead to the withdrawal of IGT114 - Extending the data available to Suppliers under K24.3(l) as it would be superfluous. The Workgroup noted that the UNC Legal Text provided references re an instruction to the CDSP to change the Data Permissions Matrix by instruction from Contract Managers. However, it is suggested that the term DSC Contract Management Committee is used as this would be consistent and would prevent possible confusion that a DSC Contract Manager could instruct a change in isolation.

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 | Positive |
| (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 Modification Proposal will have a positive impact on relevant objectives D) Securing of effective competition and F) Promotion of efficiency in the implementation and administration of the Code for the following reasons:

D) Securing of effective competition: This ensures effective competition as User groups have the same access to information, for example AQ in a switching event can accommodate Shipper activities. It provides the ability of Users to request access to certain data fields they believe are required.

F) Promotion of efficiency in the implementation and administration of the Code: This formalises the permissions and sets out the process in which these can be amended.

Workgroup Comments

The Workgroup agreed that the modification would have a positive impact on Relevant Objective F) Promotion of efficiency in the administration of the Code as implementation of this modification would reduce the need to raise UNC Modifications to provide permission to release data where this would be of a non-material nature, making the process more responsive and efficient.

The Workgroup believe that this modification does not specifically promote Relevant Objective D) Securing of effective competition as it is focussed on the way changes to Data Items are managed rather than itself changing data items currently made available to non-code parties.

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 Comments

The Workgroup discussed possible implementation for this modification and noted that both IGT115 and UNC649S are required to be implemented together in order to allow Xoserve the necessary permissions to share both GT and IGT data. The UNC Code Administrator noted that it would be the intention to implement UNC649S 16 days after a panel decision. The IGT Code Administrator noted that this would be after the November release date of 2nd November 2018. The Workgroup recommended that the Panel consider delaying the date of the November release to 9th or 10th of November to accommodate this modification and eliminate the need for an extraordinary release if this modification is implemented.

9 Legal Text

Text Commentary

Legal text has been put forward on behalf of the IGTs to replace that suggested by the proposer of the Modification:

Section K

24.6 Data Permissions Matrix

24.6.1 Nothing in Clause 23.1 shall apply to the disclosure of Protected Information by the CDSP in accordance with the provisions of the Data Permissions Matrix. In the event of an inconsistency between the provisions of Clause 23 or Clause 24 of this Part K and the Data Permissions Matrix, the Data Permissions Matrix will take precedent.

24.6.2 For the avoidance of doubt, a Modification is required to add a new User type (e.g. Supplier, Price Comparison Website etc.) to the Data Permissions Matrix.

Section M

"Data Permission Matrix" shall have the meaning ascribed thereto in the UNC;

Workgroup Comments

The Workgroup agreed that the proposed legal text supports the proposed solution.

10 Recommendations

Panel's Recommendation to Interested Parties

The Panel have recommended that this report is issued to consultation and all parties should consider whether they wish to submit views regarding this self-governance modification.

The Panel also wish to seek industries views on the implementation of this modification. The Panel are keen to keep this modification in line with the implementation of UNC649S, however, are cognisant of the need to ensure Code releases are managed according to the prescribed schedule. Panel would therefore like respondents to answer the below question:

'Do parties see any impacts or complications in delaying the implementation of the scheduled November Code release? The November Code release is due to be implemented on 2nd November, and proposer of IGT115 has requested that the November release is delayed until 9th or 10th of November in order to align with the achievable implementation date of UNC649S.'