

Modification	At what stage is this document in the process?
<h1>IGT118:</h1> <h2>Amendments to the IGT UNC Password Protection Protocols</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #00a651; color: white; padding: 5px; display: flex; align-items: center; justify-content: center;"> 01 Modification </div> <div style="border: 1px solid #00a651; padding: 5px; display: flex; align-items: center; justify-content: center;"> 02 Workgroup Report </div> <div style="border: 1px solid #00a651; padding: 5px; display: flex; align-items: center; justify-content: center;"> 03 Draft Modification Report </div> <div style="border: 1px solid #00a651; padding: 5px; display: flex; align-items: center; justify-content: center;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>The purpose of this modification is to update and align the password protection mechanism of the IGT UNC to those used within the wider industry.</p>	
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> subject to self-governance assessed by a Workgroup <p>This modification will be presented by the Proposer to the Panel on 21 November 2018. The Panel will consider the Proposer’s recommendation and determine the appropriate route.</p>
	<p>High Impact: N/A</p>
	<p>Medium Impact: N/A</p>
	<p>Low Impact: IGTs, Shippers, CDSP</p>

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Timetable			
The Proposer recommends the following timetable:			
Initial consideration by Workgroup	04 December 2018		
Amended Modification considered by Workgroup	dd month year		
Workgroup Report presented to Panel	19 December 2018		
Draft Modification Report issued for consultation	20 December 2018		
Consultation Close-out for representations	16 January 2019		
Variation Request presented to Panel	dd month year		
Final Modification Report available for Panel	21 January 2019		
Modification Panel decision	20 February 2019		

1 Summary

What

The Password Protection Protocol ancillary document is being amended to bring the provisions up to date with the information technology and mechanisms by which protected information is sent between the Pipeline User and Pipeline Operators within the industry.

Why

There are provisions within the document which date back to the original drafting of this document and the requirements are now out of date. Information Technology has advanced significantly over the last decade and the ancillary document drafting needs to be brought in line with these advancements.

How

Although passwords are unique to each Pipeline User according to the current requirements this change seeks to create provisions on the configuration of passwords so they are secure and robust.

The proposal is to be generic yet flexible so it can be adapted to Pipeline User and Pipeline Operator procedures and creating bilateral agreements where necessary. The ancillary document will outline an industry standard for creating passwords for the purpose of sending protected information. The change seeks to align with approaches being taken throughout Industry Codes.

2 Governance

Justification for 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 or Customers in relation to information shared between members of the IGT UNC. The changes proposed are to tighten the ancillary document drafting around security of information shared across the network and are deemed as document housekeeping. Although Customer data is within the data shared this change is not materially seeking to change the process. It is instead seeking to update the efficiency in the drafting.

Requested Next Steps

This modification should:

- be assessed by a Workgroup

3 Why Change?

This change has been raised to modernise the Password Protection Protocol measures; bringing them in line with advancements in information technology in sharing protected information between the Pipeline User and the Pipeline Operator.

The benefit of the change is that data will be shared more securely via utilising a securely configured password with minimum industry standards, this doesn't preclude anyone from having higher standards but these will be delivered via bilateral agreements.

Provisions around the configuration of passwords and the frequency passwords are refreshed/updated will mean there is a lower risk of passwords being hacked and the protected information being accessed by parties not permitted to it.

Currently the document is prescriptive on which devices should be used e.g. email, CD, DVD and with the constant advancements in which devices or downloads can be used, it is recommended to make code clear but not too rigid in case the device quoted is decommissioned soon after. It also means with this approach that maintenance of the ancillary document will be based on process changes not technology advancement.

Additionally, some Pipeline Operators have confirmed that some Pipeline Users have never provided a password and therefore are constantly using the same one which is not in line with new data regulations. To ensure that data is robustly protected with regular changes it is necessary to update the current drafting.

4 Code Specific Matters

Technical Skillsets

IT security information may be required.

5 Solution

To ensure consistent and robust transfer of data between the Pipeline Operator and the Pipeline User the following requirements are needed for this solution:

- Create a defined term which allows IGT UNC parties (Pipeline Operators and Pipeline Users) to bilaterally agree password standards between themselves

Example: Document Encryption – a bilaterally agreed password and/or document encryption which is in line with Pipeline User and Pipeline Operator data security policies

- Create a baseline password encryption standard which Pipeline Users and Pipeline Operators will follow when creating passwords. This includes the requirement for the Pipeline Operator to change any passwords they allocate in-line with the quarterly requirements, which is to address the same password being allocated for a prolonged period of time

- Generically define the technical devices which can be used to transfer the data between the Pipeline Operator and the Pipeline User; currently this is mainly email but should something be posted it is not ringfenced to e.g. USB or DVD as these may be decommissioned as technology progresses. The device must meet the minimum standards for information security and be bilaterally agreed if an IGT party prefers something of a higher level of encryption
- Clarify the dates used for the Invoice Supporting Data; the Billing Period will be used to determine the password for transportation charges (the example may have to change subject to IGT112). Should IGT112 be approved, the password should be linked to the T01_IGT_INV_HEADER CREATION_DATE formatted YYYYMMDD, it is then linked to the month of issue (same principle as the CDSP applies) rather than the Billing Period
- There is a provision to change passwords outside of the frequency where a suspected or confirmed breach may have occurred – this will allow the Pipeline User to provide a password without the stipulated notice
- To create a mechanism for submission of the passwords between Pipeline User and Pipeline Operator e.g. sending to the named operational SOS contact

6 Impacts & Other Considerations

IGT112 – Refinements to the RPC template

SPAA and MRA Joint Working Group – Secure Communications Working Group

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	None

respects the availability of gas to their domestic customers	
(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

We believe the proposed change falls within Relevant Objective (F) as it seeks to improve administration by adding clarity to the provisions within code as well as improving the secure means by which protected information is sent between the Pipeline User and the Pipeline Operator.

8 Implementation

28 February 2019

9 Legal Text

Suggested Text

See Appendix 1

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that the Modification is suitable to follow Self-Governance procedures
- Refer this proposal to a Workgroup for assessment.

11 Appendix 1

[Attachment 1 – Proposed amendments to the Password Protection Protocol Ancillary Document](#)