

Final Modification Report

At what stage is this document in the process?

IGT122:

Amendment of the Data Permission Matrix to add Meter Asset Provider as a new User type









Purpose of Modification:

This Modification seeks to amend the Data Permissions Matrix to add Meter Asset Provider (MAP) as a new User type.



Panel consideration is due on 17th May 2019

The Panel recommends implementation of this self-governance modification.



High Impact:

None



Medium Impact:

None



Low Impact:

Transporters, Shipper Users, CDSP



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17th April 2019

10th May 2019

dd month year 13th May 2019

17th May 2019

An equivalent Modification (0684) has been raised for the UNC, it would be beneficial for the two Modifications to be developed at one workgroup.

Work Group Comments

Draft Modification Report issued for consultation

Consultation Close-out for representations

Final Modification Report available for Panel

Variation Request presented to Panel

Modification Panel decision

The Workgroup reviewed the proposed timetable and acknowledged that this needed to be updated to reflect the new agreed path. The Code Administrator updated the timetable and the Workgroup agreed the future proposed dates.



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provisions within the document which date back to the original drafting of this document and the requirements are now out of date.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

Workgroup Comments

The Workgroup agreed with the Proposers timetable as set out in the modification.



3 Why Change?

This change is required to add MAP as a new User type to the DPM in line with code set out in Modification 115. This will then enable a request for the disclosure of specific data to be submitted to the DSC Contract Management Committee for approval, where needed, to support the data cleansing and verification in order to populate the accurate MAP Id in UK Link systems for onward transmission to CSS.

Also, as part of the Joint MIS Development Group (JMDG), Use case 58 was recommended for progression to provide MAP access to CDSP system data to assist with validating asset and Supplier information to aid in cleansing data for assuring operational processes.

4 Code Specific Matters

Reference Documents

MAPs are specified in IGT UNC under Section K 23.9 and are already allowed to receive data from the Central Data Service Provider (CDSP) as per the rules set out in Section V5.16 of the UNC..

5 Solution

This enabling Modification is proposing to add the MAP as a new User type to the DPM.

Workgroup Comments

The Workgroup discussed the solution and agreed this reflected the most pragmatic approach.

6 Impacts & Other Considerations

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

No impact.

Consumer Impacts

None directly identified, this is a permissions Modification to permit the release of data that may lead to benefits to the consumer. However, this is subject to confirmation by the PIA.

Environmental Impacts

N/A

Cross Code Impacts

There will be a Modification for both the IGT UNC and the UNC, the UNC Modification is 0684.



Central Systems Impacts

As this is a permissions Modification there are no direct impacts, however, impacts will be identified and developed through the DSC Contract Management Committee and the DSC Change Management Committee, where required, to deliver the data requested.

Workgroup Comments

The Workgroup agreed with the Proposers view on Impacts.

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	None	
(i) the combined pipe-line system; and/or		
(ii) the pipe-line system of one or more other relevant gas transporters		
(C) Efficient discharge of the licensee's obligations	None	
(D) Securing of effective competition:	None	
(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		
(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 is to add Meter Asset Provider (MAP) to the Data Permissions Matrix. This Modification is less onerous than creating bespoke permissions for Meter Asset Provider (MAP) within the main body of IGT UNC to facilitate data access as part of consequential changes from CSS. This modification also aligns with the principles approved in IGT UNC Modification 115 - Update to IGT UNC to formalise the Data Permission Matrix (IGT UNC Section K 24.6).

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.



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, it should also be aligned with the UNC.

Workgroup Comments

The Workgroup discussed the suggested implementation date, with the Chair noting that a non-material documentation only change usually requires a two-month lead time within the Code. The Chair noted that any inclusion in an earlier release will have to be justified to the Panel. The Workgroup noted that 16 Business days following a Panel decision would be close enough to the Schedule June release to pragmatically include it in this, however, the Workgroup settled to defer the decision to the Panel.

9 Legal Text

Text Commentary

None provided

Text

K24.3(o) To the disclosure of information to a Meter Asset Provider whereby such disclosure shall be in accordance with either paragraph 5.5.2(j) of Section V of the UNC or paragraph 23.9 of this Part K.

Workgroup Comments

The Workgroup discussed the suggested legal text, noting that the UNC is currently not suggesting adding legal text to their modification. The Code Administrator noted that they are expecting a follow up modification to remove the current provisions for MAPs within the IGT UNC. The Workgroup therefore agreed with the Proposers suggested legal text and noted that this fully delivers the modifications solution.



10 Consultation

Panel invited representations from interested parties with the Consultation closing on 10th May 2019. 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
NPower	Support	F - positive	 We believe this will improve the accuracy of industry data and therefore welcome the positive step this modification brings. It is agreed that the change meets the self-governance criteria. There are no impacts or costs foreseen with the implementation of this change. We are supportive of the implementation date outlined within this modification. The proposed legal text is deemed sufficient to achieve the purpose of the modification. Improving the accuracy of data will meet objective F – promotion of efficiency in the implementation and administration of the Code as outlined within the modification.
E.ON	Support	F - positive	 We support this change as we believe introducing Meter Asset Providers as a specified User Type within the Data Permissions Matrix is the right thing to do in light of Ofgem's Central Switching Service Consequential Change. It is agreed that the change meets the self-governance criteria. We agree with the proposed relevant objectives. We support the proposed implementation date. We envisage low/minimal costs if any for implementation of this modification. We are satisfied with the proposed to the legal text.



In summary:

- Two responses were received to the consultation for IGT122 from two Pipelines Users;
- Both respondents offered support for this modification;
- Both respondents agreed that the Modification better facilitates Relevant Objectives F) Promotion
 of efficiency in the implementation and administration of the Code;
- Both respondents agreed that the Modification meets the criteria for Self-Governance;
- Both respondents were satisfied with the legal text for this modification; and
- Both respondents agreed that the change should be implemented within the June release.

11 Panel Discussions

Discussion

The Chair summarised the responses noting that two responses where received both of which provided full support for the implementation of this modification. Panel members discussed the fact that UNC684 had progressed through Panel and it was indicated that this modification had a planned implementation date of 10th June 2019. The Chair informed Panel that the Code Administrator had been in touch in regards to this. The Chair indicated that it would not possible for the IGT UNC to implement this modification on the 10th June as it would still be in our appeal window.

Consideration of the Relevant Objectives

All Panel members agreed that this Modification meets the criteria set out in Objective F and the published criteria for Self-Governance modifications.

Determinations

The vote was carried out with two Pipeline Operators and three Pipeline Users. The Panel agreed by unanimous vote that the Modification should be implemented. All Panel members agreed that this Modification should be implemented in the scheduled June release. This modification is subject to a 15-day appeal window as per the Self-Governance process.

12 Recommendations

Panel Determination Self-Governance

Members agreed:

that Modification 122 should be implemented