IGT | UNC

Modification	At what stage is this document in the process?
# IGT135: ## Alignment of the IGT UNC Part K and the Data Permissions Matrix	01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification Report

Purpose of Modification:

This modification seeks to rationalise IGT UNC Part K and ensure it aligns with the UNC as well as removing inconsistencies with the Data Permissions Matrix.

	The Proposer recommends that this modification should: • be subject to self-governance • be assessed by a cross code UNC/IGT Workgroup This modification will be presented by the Proposer to the Panel on 22nd November 2019. The Panel will consider the Proposer's recommendation and determine the appropriate route.
	High Impact: None
	Medium Impact: None
	Low Impact: IGTs, Shipper Users, CDSP

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Timetable

The Proposer recommends the following timetable:

Initial consideration by Workgroup	3rd December 2019
Amended Modification considered by Workgroup	dd month year
Workgroup Report presented to Panel	March 2020
Draft Modification Report issued for consultation	March 2020
Consultation Close-out for representations	April 2020
Variation Request presented to Panel	dd month year
Final Modification Report available for Panel	April 2020
Modification Panel decision	April 2020

The timetable for IGT133 should align as closely as possible to UNC697.

Panel dates for 2020 yet to be confirmed.

Any questions?

Contact:
Code Administrator

iGTUNC@gemserv.com

020 7090 1044

Proposer:
Steve Mulinganie
Gazprom

Steve.Mulinganie@gazprom-energy.com

+44 (0)799 097 2568 / +44 (0)751 799 8178

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1 Summary

What

IGT modification 115 – Update to IGT UNC to formalise the Data Permissions Matrix introduced the Data Permissions Matrix (DPM) to reduce the administration necessary to release data to relevant parties. When this modification was implemented the fundamental review of the existing Information and confidentiality and Terms of permitted disclosure aspects of the IGT UNC was not conducted so consequently this part of the IGT UNC is inconsistent. UNC modification 0697 - *Alignment of the UNC TPD Section V 5 and the Data Permissions Matrix* has been raised to rationalise UNC TPD Section V5 and remove inconsistency with the DPM.

This modification has been raised to ensure the same consistency is applied across IGT UNC Part K Section 23 and 24 drafting such that the IGT UNC describes the parties entitled to access data, rather than the data items themselves as well as aligning with UNC TPD Section V5. In parallel, the DPM will be updated to remove the services (mechanism) around how the data is shared to each market participant type (user). This will eliminate the need for DSC Contract Management Committee to approve release of a data item via other services. With this approach, an existing user who already has access to data will not require additional consent to receive the same data in a different format via an alternative mechanism.

Why

Making this change will ensure consistency between the IGT UNC, the UNC and the DPM; it will make it clear in the IGT UNC and the UNC which user has access to data and any specific criteria user types must meet to gain access to data e.g. separate confidentiality agreements. The DPM will clearly detail the data items each user stated within the IGT UNC Part K and UNC Section V5 can have access to.

This will prevent misalignment between the IGT UNC Part K the UNC TPD Section V5 and the DPM whilst making it explicit who can have access to data.

How

This modification seeks to implement within IGT UNC arrangements equivalent to those being proposed as part of UNC Modification 0697 - *Alignment of the UNC Section V5 and the Data Permissions Matrix.*

The solution is an update to IGT UNC K23 and 24 to remove the reference to the actual data items users have access to and simply detail the user. Where certain conditions are explicitly stated for a user to gain access to data, these will be rationalised by removing the detail from the UNC and including this within the Operating Guidelines Document – Data Permission Matrix Conditionality against the relevant user. This document details any additional conditionality that is not set out in the DPM which is relevant to the service provision and can be found on Xoserve.com via the following link.

It proposes to discuss the actions required with any parties referenced in the DPM that are not currently referenced in IGT UNC Part K.

It also proposes to add the parties currently referenced in IGT UNC Part K who are not detailed within the DPM as a user type.

Please note, parties who do not require DSC CoMC permissions to gain access to data, will not be added as a user within the DPM. Access for these parties will be considered on a case by case basis. Examples that could fall under this category of user could include but not limited to Ofgem, HSE.

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2 Governance

Justification Self-Governance Procedures

It is proposed that this modification is classified as **Self-Governance** as it does not have a material impact on gas consumers, competition, pipeline operations, security of supply, governance procedures and is does not discriminate between code parties. The modification is to consistently specify the parties entitled to receive Protected Information.

The UNC equivalent Modification 0697 has been raised and agreed to be treated as self-governance and therefore we propose the same approach for the IGT Modification.

Requested Next Steps

This modification should:

- be considered a non-material change and subject to self-governance
- be assessed by a Joint cross code UNC/IGT UNC Workgroup

UNC 0697 - Alignment of the UNC TPD Section V5 and the Data Permissions Matrix has been raised and assigned to a Workgroup to develop.

3 Why Change?

IGT modification 115 – Update to IGT UNC to formalise the Data Permissions Matrix introduced the Data Permissions Matrix (DPM) to reduce the administration necessary to release data to relevant parties. When this modification was implemented the fundamental review of the existing Information and confidentiality and Terms of permitted disclosure aspects of the IGT UNC was not conducted so consequently this part of the IGT UNC is inconsistent. UNC modification 0697 - *Alignment of the UNC TPD Section V 5 and the Data Permissions Matrix* has been raised to rationalise UNC TPD Section V5 and remove inconsistency with the DPM.

This modification has been raised to ensure the same consistency is applied across IGT UNC Part K Section 23 and 24 drafting such that the IGT UNC describes the parties entitled to access data, rather than the data items themselves as well as aligning with UNC TPD Section V5. In parallel, the DPM will be updated to remove the services (mechanism) around how the data is shared to each market participant type (user). This will eliminate the need for DSC Contract Management Committee to approve release of a data item via other services. With this approach, an existing user who already has access to data will not require additional consent to receive the same data in a different format via an alternative mechanism.

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4 Code Specific Matters

Reference Documents

Data Permissions Matrix and supporting **Operating Guidelines DPM Conditionality** documents that specifies the parties, data items and delivery medium and can be found on Xoserve.com

5 Solution

This modification proposes to ensure consistency across IGT UNC, UNC TPD Section V5 drafting and the **Data Permissions Matrix** such that the UNC describes the user types entitled to access data, rather than the data items themselves. This will involve the removal of references in the IGT UNC to the actual data items users have access to and simply detail the users. This will also require discussion around user types currently within the DPM but not explicitly referenced within the IGT UNC These users include:

- Authorised Agency Users
- Major Energy Users
- Energy Theft Tip-Off Service (ETTOS)

As well as adding users to the IGT UNC, users who are currently detailed within the IGT UNC but not in the DPM will need to be added to the DPM. These are:

- Theft Risk Assessment Service (TRAS)
- Performance Assurance Framework Administrator (PAFA)
- Data Communications Company (DCC)

It further proposes to rationalise referencing to other conditions of access specific to users by setting criteria where a special condition for access is required for example a separate confidentiality agreement and describing this in detail within the Operating Guidelines DPM Conditionality.

The equivalent changes to the DPM will be made to remove the services (mechanism) around how the data is shared to each user type. This will eliminate the need for the DSC Contract Management to approve another service. With this logic, an existing user who already has access to data will not require additional Committee approval to receive the same data in a different format via an alternative mechanism. To confirm, the DPM will still have a Portfolio and Community view for each user and detail the data they are able to access but no other conditions such as the mechanism to access data will be described.

Please note, if there is an IGT UNC code clause which allows a user access to data which is not currently detailed within the DPM, the IGT UNC code clause will supersede the DPM. Every effort will be made to avoid this situation and ensure that users who have gained consent to access data and are detailed within the IGT UNC are also covered under the DPM.

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6 Impacts & Other Considerations

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

The Ofgem Faster Switching Programme SCR is currently consulting with the Retail Energy Code Data Access Schedule which proposes a 'Data Access Matrix'. This modification better aligns the Data Permissions Matrix to the structure anticipated by the Data Access Matrix.

Consumer Impacts

None

Environmental Impacts

None

Cross Code Impacts

UNC modification 0697 - Alignment of the UNC TPD Section V5 and the Data Permissions Matrix has been raised to make the changes to the UNC. It is intended that the intent of the two modifications remain aligned.

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

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(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

Adding entities specfied in IGT UNC Part K to the DPM and removing reference to specific data items within IGT UNC which are now covered under the DPM will further relevant objective (f) as it ensures that the body of the UNC is simplified and aligns with the principles approved in IGT Modification 115 - Update to IGT UNC to formalise the Data Permissions Matrix and the equivalent UNC Modification 0649S - Update to UNC to formalise the Data Permission Matrix.

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 modification.

9 Legal Text

Text Commentary

Not provided (at this point)

Text

Not provided (at this point)

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Self Governance/ procedures should apply
- Refer this proposal to a cross-code Workgroup for assessment.

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