

Draft Modification Report	At what stage is this document in the process?
<h1>IGT136:</h1> <h2>Introducing 'Performance Assurance Framework Administrator' as a new User type to the Data Permissions Matrix</h2>	<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;"> <span style="border: 1px solid green; border-radius: 50%; padding: 2px 5px;">01</span> Modification         </div> <div style="border: 1px solid blue; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid blue; border-radius: 50%; padding: 2px 5px;">02</span> Workgroup Report         </div> <div style="border: 1px solid purple; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid purple; border-radius: 50%; padding: 2px 5px;">03</span> Draft Modification Report         </div> <div style="border: 1px solid orange; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid orange; border-radius: 50%; padding: 2px 5px;">04</span> Final Modification Report         </div> </div>
<p><b>Purpose of Modification:</b></p> <p>Currently the Performance Assurance Framework Administrator (PAFA) is provided with the reports defined in the Performance Assurance Report Register (PARR) in order to fulfil their obligations. This modification seeks to amend the Data Permissions Matrix to add the PAFA as a new User type.</p>	
	<p>The close-out date for responses is 20<sup>th</sup> May 2020, which should be sent to <a href="mailto:IGTUNC@Gemserv.com">IGTUNC@Gemserv.com</a>. A response template, which you may wish to use, is at the <a href="#">IGT UNC website</a>.</p> <p>The Proposer recommends that this modification should:</p> <ul style="list-style-type: none"> <li>• be subject to self-governance</li> <li>• be assessed by a Joint UNC / iGT Workgroup</li> <li>• proceed to Consultation</li> </ul>
	<p>High Impact:</p> <p>None</p>
	<p>Medium Impact:</p> <p>None</p>
	<p>Low Impact:</p> <p>Transporters, Shipper Users, CDSP</p>

Contents		 <b>Any questions?</b>
<b>1 Summary</b>	<b>3</b>	Contact: <b>Code Administrator</b>
<b>2 Governance</b>	<b>3</b>	 <b>igtunc@gemserv.com</b>
<b>3 Why Change?</b>	<b>4</b>	 <b>020 7090 1044</b>
<b>4 Code Specific Matters</b>	<b>4</b>	Proposer: <b>Carl Whitehouse</b>
<b>5 Solution</b>	<b>4</b>	 <a href="mailto:carl.whitehouse@shellenergy.co.uk"><b>carl.whitehouse@shellenergy.co.uk</b></a>
<b>6 Impacts &amp; Other Considerations</b>	<b>5</b>	 <b>07545 209826</b>
<b>7 Relevant Objectives</b>	<b>5</b>	
<b>8 Implementation</b>	<b>6</b>	
<b>9 Legal Text</b>	<b>6</b>	
<b>10 Recommendations</b>	<b>7</b>	
Timetable		
<b>The Proposer recommends the following timetable:</b>		
Initial consideration by Workgroup	7 <sup>th</sup> January 2020	
Amended Modification considered by Workgroup		
Workgroup Report presented to Panel	24 <sup>th</sup> April 2020	
Draft Modification Report issued for consultation	27 <sup>th</sup> April 2020	
Consultation Close-out for representations	20 <sup>th</sup> May 2020	
Variation Request presented to Panel		
Final Modification Report available for Panel	21 <sup>st</sup> May 2020	
Modification Panel decision	29 <sup>th</sup> May 2020	
<p>An equivalent modification has been raised (UNC 0707) in November 2019 and development has commenced in a Workgroup. It was proposed that a joint UNC / IGT Workgroup continued jointly.</p>		

## Comments

**The Panel agreed to send this modification to consultation.**

## 1 Summary

### What

The Performance Assurance Framework Administrator (PAFA) is already entitled to data under UNC for the purposes of conducting the functions ascribed to the PAFA by the Performance Assurance Framework (PAF) document but are not currently specified as a User Type within the Data Permissions Matrix (DPM).

Modification 0649S – “Update to UNC to formalise the Data Permission Matrix” formally created the Data Permission Matrix as part of the UK Link Manual. Modification 0649S requires that the addition of a new User type (a new party to be recognised on the Data Permission Matrix) is undertaken by a UNC Modification. Once the new User type is created, the approval for the release of data to the new User type is held by the Data Services Contract, Contract Management Committee (DSC CoMC).

### Why

In line with UNC Legal Text implemented for 0649S a new Modification is needed to add a new User type to the DPM, regardless of if they are already specified under UNC Section V.

PAFA are currently entitled to access Protected Information as reasonably required for the purpose of performing functions under the PAF Contract. Adding PAFA to the DPM will, subject to DSC CoMC approval, facilitate release of data over and above what is currently defined in the Performance Administrator Report Register.

### How

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

## 2 Governance

### Justification for Self-Governance

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 does not discriminate between code parties. The Modification is to enable data sharing permissions only and therefore an administrative enabler only.

It is recommended that this modification is developed at a joint Workgroup coinciding with an alternative modification in the UNC.

### Requested Next Steps

This modification should:

- be subject to self-governance
- be assessed by a joint UNC / IGT Workgroup

## Workgroup Comments

There were no objections to the modification being subject to self-governance which mirrors the UNC approach.

### 3 Why Change?

This change is proposed to add PAFA as a new User type to the DPM in line with the requirements set out in Modification 0649S. This will then enable a request for the disclosure of specific data to be submitted to the DSC CoMC for approval, where needed, to enable the PAFA to access additional data than is currently specifically available via the reports defined in the PARR. Provision of this additional data will enable the PAFA to [better understand context of the output reports described in the Performance Assurance Reports Register, and therefore refine actions needed and ensure that they can engage fully with the relevant User to understand the impacts and reasons for failures and assess the efficacy of the reports].

The Performance Assurance Committee has specifically requested that the inclusion of the PAFA in the DPM is expediated so that additional information is available to the PAFA prior to implementation of UNC Modification 0697 - Alignment of the UNC TPD Section V5 and the Data Permissions Matrix.

[It is anticipated that, following approval of this Modification, the data made available to the PAFA will be **initially** limited to the individual data items that are used to create the summary reports that form the existing PARR. This is for information only as this will be subject to approval by the DSC Contract Management Committee.]

### 4 Code Specific Matters

#### Reference Documents

The Performance Assurance Report Register is available here: [PARR](#)

### 5 Solution

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

#### Workgroup Comments

The Workgroup agreed that the solution aligns with UNC0707S and there is a requirement for the IGT UNC to also deliver these changes, however it recognises that some governance relating to the PAFA already exists in code.

## 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?

No impact to any existing SCR.

#### Consumer Impacts

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

#### Workgroup Comments

The workgroup noted that the equivalent UNC modification 0707S has already been implemented.

## 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 is to add Performance Assurance Framework Administrator to the Data Permissions Matrix. This Modification is less onerous than creating bespoke permissions for the PAFA within the main body of iGT UNC to enable additional data to be released on a case by case basis to support the objectives of the Performance Assurance Framework

### Workgroup Comments

The Workgroup supports the proposer's view on the relevant objectives.

## 8 Implementation

As the self-governance procedure is being proposed, implementation could be 16 business days after a Modification Panel decision to implement, and subject to no appeal being raised.

### Workgroup Comments

The Workgroup recognises that the UNC mod0707S had been implemented and therefore recommended that this implementation is carried out in the next release, which could be an adhoc release and subject to a decision by the Panel.

## 9 Legal Text

### Suggested Text

#### Commentary

The drafting requires that where information is disclosed to the PAFA that it must meet the requirements in (i) currently in the IGT UNC or (ii) in accordance with the Data Permissions Matrix as defined and articulated under the UNC.

#### IGT UNC Part K

24.3 Nothing in Clause 23.1 shall apply:

.....

- (k) to the Performance Assurance Framework Administrator provided
  - (i) the terms of the relevant PAFA Contract require the Performance Assurance Framework Administrator to maintain the confidentiality of such information on terms no less onerous than those of paragraph 23.2 or 23.3, save to the extent disclosure of such information is necessary to comply with the terms of the PAFA Contract; or
  - (ii) disclosure of such information shall be in accordance with paragraph 5.5.2(j) of Section V of the UNC.

*For ease of reference:*

*UNC Section V paragraph 5.5.2(j)*

*5.5.2 Nothing in paragraph 5.1 or 5.2 shall apply:*

*(j) to the disclosure of Protected Information by the CDSP in accordance with the provisions of the Data Permissions Matrix (as defined in paragraph 5.2.1(g) of section D of the General Terms). In the event of*

*an inconsistency between the provisions of paragraphs 5.5, 5.11 or 5.15 - 5.18 of this Section V and the Data Permissions Matrix, the Data Permissions Matrix will take precedent. For the avoidance of doubt, a Code Modification is required to add a new User type (e.g. Supplier, Price Comparison Website etc.) to the Data Permissions Matrix.*

## Workgroup Comments

- The Workgroup agreed that the legal text reflected the intent of the modification.

## 10 Recommendations

### Panel's Recommendation to Interested Parties

The Panel have recommended that this modification should proceed to consultation.