

Final Modification Report	At what stage is this document in the process?
<h1>IGT139:</h1> <h2>Introducing a new User type to the IGT UNC and the Data Permissions Matrix of Electricity System Operator (ESO)</h2>	<div style="display: flex; flex-direction: column; gap: 10px;"> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 01 Modification </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification: This Modification Proposal seeks to add Electricity System Operator (ESO) as a new User type to the Data Permissions Matrix.</p>	
	<p>Panel consideration is due on 29th May 2020 The Panel agreed implementation</p>
	<p>High Impact: None</p>
	<p>Medium Impact: None</p>
	<p>Low Impact: Transporters, Shipper Users, CDSP</p>

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Timeline			 07816 172645 (KD)
The Proposer recommends the following timetable:			
Initial consideration by Workgroup		9 th April 2020	
Amended Modification considered by Workgroup			
Workgroup Report presented to Panel		24 th April 2020	
Draft Modification Report issued for consultation		27 th April 2020	
Consultation Close-out for representations		20 th May 2020	
Variation Request presented to Panel			
Final Modification Report available for Panel		21 st May 2020	
Modification Panel decision		29 th May 2020	

1 Summary

What

On the 1st April 2019 National Grid Electricity System Operator (NG ESO) was established as a separate legal entity within the National Grid Group. Under the existing arrangements only National Grid Gas is party to the Data Services Contract (DSC) and therefore NG ESO as a third party is subject to the Third Party and Additional Services Policy.

The Data Permissions Matrix (part of the UK Link Manual) describes those parties (including third parties) who can access certain data managed by the CDSP (Xoserve).

Why

Each year, NG ESO produces the *Future Energy Scenarios* (FES) report which maps out credible pathways and scenarios for the future of energy. Based on input from experts, it looks at the energy needed in Britain, across electricity and gas - examining where it could come from, how it needs to change and what this means for consumers and the energy system itself. Furthermore, NG ESO produces Electricity Ten Year Statement (ETYS) annually. It's part of the annual electricity transmission planning cycle and shows the likely future transmission requirements of bulk power transfer capability of the National Electricity Transmission System (NETS).

In order to gather relevant information for these publications, NG ESO needs to obtain certain data from the CDSP. However, the Electricity System Operator (ESO) is not a currently a 'User type' in the Data Permissions Matrix. Under the terms of UNC TPD V5.5.2 a Code Modification is required in order to add a new User type to the Data Permission Matrix.

How

It is proposed that pursuant to the requirements of UNC TPD V5.5.2(j) 'Electricity System Operator (ESO)' is added as a new User type in the Data Permissions Matrix. This will support and enable the ongoing production of the FES and ETYS report by NG ESO which are a key industry documents utilised by energy industry stakeholders.

The UNC equivalent solution is being developed through UNC 0715.

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 Proposal is to enable data sharing permissions only.

Requested Next Steps

- This Modification should: be considered a non-material change and subject to self-governance
- assessed by a Workgroup

Workgroup Comments

The Workgroup agreed with the proposer's recommendation that this modification should be subject to self-governance.

3 Why Change?

Each year, NG ESO produces the *Future Energy Scenarios* (FES) report which maps out credible pathways and scenarios for the future of energy. Based on input from experts, it looks at the energy needed in Britain, across electricity and gas - examining where it could come from, how it needs to change and what this means for consumers and the energy system itself. Furthermore, NG ESO produces Electricity Ten Year Statement (ETYS) annually. It's part of the annual electricity transmission planning cycle and shows the likely future transmission requirements of bulk power transfer capability of the National Electricity Transmission System (NETS).

In order to gather relevant information for these publications, NG ESO needs to obtain certain data from the CDSP. However, the Electricity System Operator (ESO) is not currently a 'User type' in the Data Permissions Matrix. Under the terms of UNC TPD V5.5.2 a Code Modification is required in order to add a new User type to the Data Permission Matrix.

Addition of the new User type will enable NG ESO to request access to specific information held by the CDSP to facilitate the conduct of relevant analysis to enable collation of the FES/ETYS reports.

If the new User type is created, the approval for the release of data to the new User type is sanctioned by the DSC Contract Management Committee (CoMC) therefore if this Proposal is implemented, a request for the disclosure of data will be submitted and considered by the CoMC.

4 Code Specific Matters

Technical Skillsets

N/A

Reference Documents

FES reports are available here: <http://fes.nationalgrid.com/>

ETYS reports are available here: <https://www.nationalgrideso.com/publications/electricity-ten-year-statement-etys>

Knowledge/Skills

Not identified

5 Solution

It is proposed that Electricity System Operator (ESO) is added as a new User type to the Data Permission Matrix.

Workgroup Comments

The Workgroup agreed the need for the ESO to be recognised as a separate entity from National Grid gas and that this follows the UNC.

The Workgroup discussed how the ESO would be given access to data and that it was the responsibility of the Contract Management Committee. It was also discussed that what the ESO require now may be subject to change in the future, however this will be covered at the Contract Management Committee.

6 Impacts & Other Considerations

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

No

Consumer Impacts

No direct impacts have been identified; however, this enables an Electricity System Operator to request the release of data managed by the CDSP. If this data enables an ESO to deliver a credible range of Future Energy Scenarios, this may lead to benefits to some or all energy markets stakeholders including consumers.

Cross Code Impacts

UNC modification 0715 - Amendment of the Data Permission Matrix to add Electricity System Operator (ESO) as a new User type has been raised to make the changes to the UNC. It is intended that the intent of the two modifications remain aligned.

EU Code Impacts

None

Central Systems Impacts

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

Workgroup Comments

The Workgroup recognised the link with the UNC and want to align the solution and delivery to it.

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

The proposal will further the objective of creating effective competition (d). By having access to relevant data ESO will provide industry insights which enable users to operate more effectively in the changing energy market.

Implementation of this Proposal would better facilitate the promotion of efficiency in the implementation and administration of the Code (f) as it seeks the addition of a User type to the Data Permissions Matrix as required by the prevailing terms of the UNC. This will facilitate consideration by the DSC Contract Management Committee of the specific CDSP-managed data to which NG ESO is seeking access which overall represents an efficient approach to the associated governance arrangements.

Workgroup Comments

The Workgroup supported the impact of the modification on objective (f) as a positive, however challenged whether there was positive impact to objective (d) as it does not secure effective competition between Parties because the Modification is only implementing a new user type.

8 Implementation

Aligned to the implementation UNC 0715

Workgroup Comments

The Workgroup supported the proposer’s recommendation that this would be implemented in an adhoc release aligned with the UNC and subject to a Panel decision.

9 Legal Text

Suggested Text

Part K - General

24 Terms of permitted disclosure

Amend paragraph 24.3 as follows:

Nothing in Clause 23.1 shall apply:

(p) to the disclosure of information to an electricity system operator, as the holder of an “Electricity Transmission Licence” (as defined in Section 6(b) in the Electricity Act 1989), to allow it to fulfil its licence obligations, whereby such disclosure shall be in accordance with paragraph 5.5.2(j) of Section V of the UNC.

Workgroup Comments

The legal text was not available; therefore, the Workgroup did not discuss this.

10 Consultation

Panel invited representations from interested parties, closing on 20th May 2020. 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
E.ON	Support	F - positive D – Does not support	<ul style="list-style-type: none"> We support the inclusion of the ESO into the Data Permissions Matrix and being recognised as a new user. We support objective F relating to efficiency in the code but as this is only adding a new user recognition, we don’t believe it meets objective D, this instead relates to the activity completed by the CoMC. We agree this modification should be self-

			<p>governance.</p> <ul style="list-style-type: none"> We support a joint IGT UNC and UNC implementation with the same coordinated date, this we believe better facilitates the CoMC. If approved at separate times the CoMC cannot approve until the last modification approval is given.
Scottish Power	Support	F - positive D – Does not support	<ul style="list-style-type: none"> We support the inclusion of the Electricity System Operator (ESO) into the Data Permissions Matrix and being recognised as a new user. We support a joint implementation date with UNC 0715S. If these are approved at separate times the CoMC will be unable to approve until the last modification is given approval.
ESPUG	Support	F - positive D – Does not support	<ul style="list-style-type: none"> We support this modification as it seeks to allow the ESO access to data required to report on the Future Energy Scenarios, recognising that data access is needed due to data access implications stemming from the legal separation of National Grid ESO from National Grid. Yes, we agree that this should be a self-governance modification. We do not believe that there is any direct impact on Objective D (securing of effective competition) as this modification simply seeks to grant the ESO access to industry data. We would support a lead time of implementation aligned with UNC 0715 which contains the same intent for the Uniform Network Code. Yes, we believe the legal text delivers the intent of the modification.

11 Panel Discussions

Discussion

The Panel discussed the Modification and Consultation responses. The Code Administrator summarised the responses noting that three responses were received, one from a Pipeline Operator and two Pipeline Users. The respondents offered full support for the modification. The respondents supported the legal text drafting and self-governance status. All respondents supported a positive impact on Relevant Objective F, however, all noted that this did not meet Relevant Objective D. Some mention was made that this was due to the Modification simply allowing the ESO access to data, and therefore does not meet competition.

Consideration of the Relevant Objectives

Panel members voted and unanimously agreed that this Modification meets the criteria set out in Objective F and due to arguments mentioned in the consultation responses, the Panel agreed that this does not meet Objective D.

Determinations

The vote was carried out with two Pipeline Users and three Pipeline Operators. The Panel agreed by unanimous vote that the Modification should proceed as Self-Governance.

The Panel voted on the drafting of the legal text and all parties agreed that the legal text facilitated the modifications solution.

The Panel voted on implementation of the Modification and the Panel voted unanimously that this Modification should be implemented. The Panel agreed that this Modification should be included in the scheduled June 2020 release subject to a 15-day appeal window.

12 Recommendations

Panel Determination Self-Governance

Members agreed:

- that Modification 139 should be implemented