






Final Modification Report	At what stage is this document in the process?
<h1>IGT135:</h1> <h2>Alignment of the IGT UNC Part K and the Data Permissions Matrix</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 01 Modification </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>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.</p>	
	<p>Panel consideration is due on 23rd October 2020 <i>(delete as appropriate following Panel's decision)</i> The Panel recommends implementation</p>
	<p><i>(delete as appropriate following Panel's decision)</i> The Panel does not recommend implementation</p>
	<p>High Impact: None</p>
	<p>Medium Impact: None</p>
	<p>Low Impact: IGTs, Shipper Users, CDSP</p>

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Timeline

The Proposer recommends the following timetable:

Initial consideration by Workgroup	3 rd December 2019
Amended Modification considered by Workgroup	11 th June 2020
Workgroup Report presented to Panel	28 th August 2020
Draft Modification Report issued for consultation	2 nd September 2020
Consultation Close-out for representations	23 rd September 2020
Variation Request presented to Panel	N/A
Final Modification Report available for Panel	30 th September 2020
Modification Panel decision	23 rd October 2020

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 (this term is intended to indicate either market participant roles (e.g. MAM / MAP) or where the release of data is intended to specific organisations). 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 therefore 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 and the DPM including removing the detail from the IGT UNC which describes the users and the data items that parties can access. 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 (CoMC) to approve release of a data item via other services, unless they chose to apply different criteria to different 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, unless the DSC CoMC determine that it is necessary to do so.

Why

Making this change will remove ambiguity and any inconsistency between the IGT UNC, the UNC and the DPM. The DPM will clearly detail parties able to access data, and those data items each party can have access to.

This will prevent misalignment between the IGT UNC, the UNC 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 Part K to remove the reference to the users and actual data items users have access to. These users and the data items they have access to will be detailed within the DPM. Where certain conditions are explicitly stated for a user to gain access to data, these will be removed from the UNC, assessed and where necessary retained within the DPM supporting documentation (formally known as the Operating Guidelines Document – Data Permission Matrix Conditionality). This document is intended to provide a summary of all users within the DPM and provide conditionality details agreed by DSC Contract Managers within the DSC CoMC. This document will form part of the DPM.

It also proposes to add the parties to the DPM which are currently referenced in IGT UNC Part K who are not detailed within the DPM as a user type. Please note, this includes adding the Energy Theft Tip-Off Service (ETTOS) to the DPM, ETTOS is not currently referenced within IGT UNC but the obligation on IGTs to share data is through the SPAA..

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.

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.

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 CoMC to approve release of a given data item under another service, unless the Committee chooses to do so. 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. The DPM will still have a Portfolio and Community view for each user type¹ and detail the data they are able to access.

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 it 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.

Workgroup Comments

The Workgroup supported the Proposers approach that this is a Self-Governance Modification.

¹ Where registration details or appointment of a user type is recorded in UK Link systems.

3 Why Change?

IGT modification 115 – Update to IGT UNC to formalise the Data Permissions Matrix introduced the Data Permissions Matrix (DPM) within the IGT UNC. The DPM was intended to describe the protected information data items that each market role type is entitled to receive and to reduce the governance burden on a data service user once a use case had been established by that user.

IGT modification 115 did not fully review existing Information and confidentiality and Terms of permitted disclosure aspects of the IGT UNC to apply consistency of detail with respect to the parties with access to data, and to remove references with the IGT which are not adequately described in the DPM. 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 and the DPM including removing the detail from the IGT UNC which describes the users and the data items users can access.

Several entities specified in IGT UNC Part K are not all currently referenced in the DPM because the DPM was originally created to only describe of data via a specific service. This modification is looking to reference these within the DPM to ensure both are aligned. These parties being proposed to be added to the DPM are:

- Theft Risk Assessment Service (TRAS)
- The holder of the smart meter communications licence
- The parties given the power of investigation and consumer issue resolution

It should also be noted that the Energy Theft Tip-Off Service (ETTOS) will also be added to the DPM with the above User types. ETTOS are currently specified within the UNC (due to be removed under 0697), however they are not present within the IGT UNC as the obligation to share data is set out within SPAA.

It also proposes to remove Authorised Agency Users from the DPM. Authorised Agency Users were historically users such as the police and HSE, however their access to the Data Enquiry Service (DES) was revoked. As detailed in the 'How' section, these parties do not require CoMC approval to gain access and therefore are managed outside of the DPM and should be removed as a user.

Major Energy Users are currently detailed within the DPM. We are proposing this user is renamed to Industrial and Commercial Consumer within the DPM.

This modification also looks to rationalise IGT UNC Part K so that the users who have access to data and the data available to them is specified in the DPM, rather than the UNC itself.

Please note that the equivalent clause within UNC to Clause 23.10 Disclosure of Historic Meter Point Read Information has been relocated from UNC Section V to Section M. As part of this modification, it needs to be considered whether Clause 23.10 is updated to reflect the correct reference in UNC or whether it is removed completely as IGT UNC points directly to UNC Section M which is where this clause will be located.

The DPM currently specifies the service where the data is available to a user. This level of detail means that the provision of a data item that a user can access by a new medium requires approval by the DSC CoMC. It is proposed to remove the services (mechanism) around how the data is shared to each user type. This will eliminate the need for the CoMC to approve release of a given data item under another service, unless the CoMC chooses to do so. Whilst this does not in itself require a modification to amend,

it is proposed to do so concurrently with the development of this modification to ensure visibility and should consequential impacts to the UNC be identified these can be incorporated accordingly.

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](https://xoserve.com)

Please note, both the DPM and the supporting conditionality document will be updated following the implementation of this modification and the UNC equivalent.

5 Solution

Clause 24.6.1 within Part K of IGT UNC should be amended to remove the sentence regarding the Data Permissions Matrix taking precedent if there is an inconsistency with code:

24.6.1 Nothing in Clause 23.1 shall apply to the disclosure of Protected Information by the CDSP in accordance with the provisions of the Data Permissions Matrix. ~~In the event of an inconsistency between the provisions of Clause 23 13.0 K 106 or Clause 24 of this Part K and the Data Permissions Matrix, the Data Permissions Matrix will take precedent.~~

Clause 24.6.2 in Part K of IGT UNC is proposed to be updated to remove the User type examples. This has been proposed as it is not believed they provide any benefit, plus could cause potential confusion:

24.6.2 For the avoidance of doubt, a Modification is required to add a new User type ~~(e.g. Supplier, Price Comparison Website etc.)~~ to the Data Permissions Matrix.

For the avoidance of doubt, this modification intends to keep the current logic in place for adding a new user to the DPM, therefore a Code Modification will still be required for this activity despite the proposal not to specifically reference users added to the DPM in the UNC itself.

It is proposed that IGT UNC Part K is rationalised, removing the users from Clauses 23 and 24 along with reference to the data items such users have access to and also removing a number of references to annexes from Section V of the UNC.

For the avoidance of doubt it is intended to retain Clause 23.4 to a consumer or an appropriate person to the extent designated by the authority within Standard Special Condition A31 of the Transporter's Licence.

The modification proposes to remove the following clauses that define users within Section K:

- Clause 23.6 – the holder of the “smart meter communications licence”
- Clause 23.9 – Meter Asset Provider (MAP)
- Clause 24.3 (j) – Price Comparison Website (PCW) and Third-Party Intermediary
- Clause 24.3 (k) – Performance Assurance Committee Administrator (PAFA)
- Clause 24.3 (l) - Suppliers
- Clause 24.3 (m) – Theft Risk Assessment Service (TRAS)
- Clause 24.3 (n) – Alt Han Company (AltHanCo)

- Clause 24.3 (o) – Meter Asset Provider (MAP)
- Clause 24.3 (p) – The holder of an “Electricity Transmission Licence”²
- Clause 24.3 (q) – Research Body²
- Clause 40 – Meter Asset Manager

²These clauses are subject to implementation of IGT Modifications 139 and 135.

The UNC equivalent clause to 23.10 Disclosure of Historic Meter Point Read Information within IGT UNC has been relocated from UNC Section V to Section M. As part of this modification, it needs to be considered whether Clause 23.10 is updated to reflect the correct reference in UNC or whether it is removed completely as IGT UNC points directly to UNC Section M which is where this clause will be located.

It is proposed that additional clauses are added to the IGT UNC to reference:

The CDSP may only disclose information to DPM User types who are not also signatories to the DSC if they have entered into Third-Party Services agreements which comply with the Third-Party and Additional Services Policy

The CDSP shall, no later than 31 March in each year, publish a report identifying those DPM User which have a Third-Party Services agreement in place with the CDSP for the disclosure of information as contemplated by the clause above.

For the avoidance of doubt Part M – Definitions of IGT UNC needs to be updated to take into account the removal of the clauses detailed above.

For the avoidance of doubt, the following users who are currently detailed within the IGT UNC but not in the DPM will be added to the DPM following the implementation of this modification:

- Theft Risk Assessment Service (TRAS)
- The holder of the smart meter communications licence
- The parties given the power of investigation and consumer issue resolution

It should also be noted that the Energy Theft Tip-Off Service (ETTOS) will also be added to the DPM with the above User types. ETTOS are currently specified within the UNC (due to be removed under 0697), however they are not present within the IGT UNC as the obligation is defined under SPAA. As this modification proposes to remove the users and data items they have access to from IGT UNC, it is not looking to add ETTOS to IGT UNC but the DPM only.

Workgroup Comments

The Workgroup discussed the potential impact of the BEIS consultation on Smart Metering on the UNC and this Modification. The Chair indicated that this Modification is not yet impacted by those changes as the IGT UNC was not included in the BEIS consultation. The Proposer indicated that discussions had been had between the DNs and BEIS and that the matter is in hand. A Modification will be needed to add a clause into the IGT UNC once the BEIS changes have been applied to the UNC.

The Workgroup were comfortable with this information and that there may be an impact to the clauses in this solution, however, it will be a subsequent change to this Modification.

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.

Workgroup Comments

The Workgroup were comfortable with the Proposers suggestions and had nothing else to note.

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	None

satisfied as 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

Adding entities specified in IGT UNC Part K to the DPM and removing reference to Users and 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. This Modification would also propose an arrangement whereby access to data is controlled through one DSC CoMC governed document which would rationalise and streamline access to data held by the CDSP.

Workgroup Comments

The Workgroup agreed with the Proposers suggestion that this meets Relevant Objective F.

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.

Workgroup Comments

The Workgroup were in agreement with the proposers view that this should be implemented in line with the UNC Modification.

9 Legal Text

Text Commentary

For the avoidance of doubt the clauses in Part K will be renumbered where applicable to ensure the sequencing is correct following the removal of a large section of this code.

Text

Part K

~~23.6 The CDSP are authorised to disclose such data as is set out within Annex V-10 of the UNC to the holder of the “smart meter communications licence” as defined by the Statutory Instrument 2012 No.2400: The Electricity and Gas (Smart Meters Licensable Activity) Order 2012. Such data may relate to all Supply Meter Points regardless of status. The CDSP are authorised to appoint a third-party agent (i.e. Xoserve) to manage the collation and transmission of the data set out within Annex V-10 of the UNC on to the holder of the “smart meter communications licence”~~

~~23.9 Disclosure of Meter Asset Provider Information~~

~~23.9.1 For the purposes of this Clause 23.8 the Pipeline Operators are authorised to disclose such data as is set out within Annex V-9 of the UNC to a Meter Asset Provider subject to the provisions of Section V5.16 of the UNC.~~

23.10 Disclosure of Historic Meter Point Read Information

23.10.1 Where in respect of any Supply Point, the CDSP is requested by the Registered User to disclose Historic Supply Meter Point Asset and Read Information such disclosure will be in accordance with paragraph ~~5.15~~ 4.4 of Section ~~V~~ M of the UNC.

K24.3

~~(j) The CDSP are authorised to disclose the following data items: Supply Meter Point Reference Number, supply point address, Meter Post Code, supplier, meter mechanism, network operator, meter capacity, meter serial number, Annual Quantity, Local Distribution Zone to a Price Comparison Website where the Price Comparison Website has received consent from the domestic consumer associated with the Supply Point and where they have entered into confidentiality and service agreements (on terms no less onerous than those in paragraph 23) and reasonable access conditions.~~

~~(i) The CDSP shall, by 31 March each year, produce a report to identify the service recipients who have signed up to the confidentiality and service agreements; 13.3 K-105~~

~~(ii) "Price Comparison Website" (PCW) shall mean an internet-based price comparison service or other internet based TPI that provides comparisons between, and/or access to, personalized quotes for retail energy to domestic customers, and may carry out, on behalf of the domestic customer an instruction to change the domestic customer's retail energy supplier, tariff or both;~~

~~(iii) "Third Party Intermediary" (TPI) shall mean an organisation or individual acting as a third party intermediary between a domestic customer and a retail energy supplier.~~

~~(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.~~

~~(l) The CDSP are authorised to disclose the following data items: Supply Meter Point Reference Number, supply point address, Meter Post Code, Current Supplier id, meter mechanism code, meter capacity, meter serial number, Annual Quantity, Local Distribution Zone to a Supplier where the Supplier has received consent from the domestic consumer associated with the Supply Point and where they have entered into confidentiality and service agreements (on terms no less onerous than those in paragraph 23) and reasonable access conditions.~~

~~(i) The CDSP shall, by 31 March each year, produce a report to identify the Suppliers who have signed up to the confidentiality and service agreements;~~

~~(m) To a person appointed pursuant to the SPAA to provide Theft Risk Assessment Service whereby such disclosure shall be in accordance with paragraph 5.5.3(l) of Section V of the UNC.~~

~~(n) To the disclosure of information to the Alt Han Company (AltHanCo) whereby such disclosure shall be in accordance with paragraph 5.5.2(j) of Section V of the UNC.~~

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

~~(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.~~

~~(q) To the disclosure of information to the Research Body whereby such disclosure shall be in accordance with paragraph 5.5.2(j) of Section V of the UNC.~~

24.6 Data Permissions Matrix

24.6.1 Nothing in Clause 23.1 shall apply to the disclosure of Protected Information by the CDSP in accordance with the provisions of the Data Permissions Matrix. ~~In the event of an inconsistency between the provisions of Clause 23 or Clause 24 of this Part K and the Data Permissions Matrix, the Data Permissions Matrix will take precedent.~~

24.6.2 For the avoidance of doubt, a Modification is required to add a new User type ~~(e.g. Supplier, Price Comparison Website etc.)~~ to the Data Permissions Matrix.

~~24.6.3 The CDSP may only disclose information to DPM User types who are not also signatories to the DSC if they have entered into Third-Party Services agreements which comply with the Third-Party and Additional Services Policy.~~

~~24.6.4 The CDSP shall, no later than 31 March in each year, publish a report identifying those DPM User which have a Third-Party Services agreement in place with the CDSP for the disclosure of information as contemplated pursuant to clause 24.6.3.~~

~~40 Disclosure of Supplier Identity to a Registered Metering Applicant~~

~~40.1 Where in respect of any Supply Point the CDSP is requested by a Registered Metering Applicant to disclose information, such disclosure will be carried on in accordance with Paragraph 5.11 of Section V of the UNC.~~

~~40.2 For the purposes of Clause 40.1 the “Registered Metering Applicant” is any person who has been registered to request and receive Supplier identity from the Pipeline Operator pursuant to an appropriate registration scheme administered by the Pipeline Operator.~~

Part K

46 Reporting

46.1.1 Pipeline Operators shall be able to produce a report (at the end of each reporting month) on theft of gas detection performance for Pipeline Operators containing the information in Annex V-~~67~~ of the UNC in respect of each Pipeline Operator (on an attributable basis) (“Independent Gas Transporter TOG Report”).

Part M Definitions

~~“Price Comparison Website” shall have the meaning in Part K 24.3(j)~~

~~“Third Party Intermediary” shall have the meaning in Part K 24.3(j)~~

~~“Performance Assurance Framework Administrator” shall have the meaning ascribed thereto in the UNC~~

~~“Theft Risk Assessment Service” shall have the meaning ascribed thereto in the SPAA~~

~~“Alt Han Company (AltHanCo)” shall have the meaning ascribed thereto in the UNC~~

~~“Meter Asset Provider” shall have the meaning ascribed thereto in the UNC;~~

~~“Research Body” shall have the meaning ascribed thereto in the UNC;~~

Workgroup Comments

The Workgroup were satisfied that the legal text supported the intention of the Solution, taking into account further amendments to the solution by the Proposer

10 Consultation

Panel invited representations from interested parties to be submitted by 23rd September 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
Indigo Pipelines	Support	F - positive	<ul style="list-style-type: none"> • We support the rationalisation of IGT UNC Part K to better align with the UNC and Data Permissions Matrix. Having the full listing of parties with data permissions in one place will improve the process and make it easier to administer. • We agree this Modification should be classified as Self-Governance. • Implementation to be aligned with the UNC equivalent Mod, minimal notice required. • We are satisfied that the proposed legal text meets the requirements of this Modification.
ESPUG	Support	F - positive	<ul style="list-style-type: none"> • We support the implementation of this modification as it seeks to improve consistency between the IGT UNC, UNC and the Data Permissions Matrix. The underlying process to facilitate this will also likely result in a smoother process to add new users to the DPM while still retaining the level of oversight currently afforded to IGTs, albeit to a higher extent through the DSC Contract Committee than the IGT UNC modification governance process. • We agree that this modification satisfies self-governance criteria. • We note that there is no particular lead time for

			implementing this modification, but that alignment should be maintained with the UNC equivalent modification and the governance processes under the DSC.
Energy Assets Pipelines	Support	F - positive	<ul style="list-style-type: none"> • This modification proposes a simplification of the current arrangements and introduces additional consistency. • We agree that this modification should be a self-governance modification as we do not consider it has a material impact. • We do not consider there is a requirement for any particular lead-time, it would be helpful if this proposal and UNC0697 were implemented at the same time.

11 Panel Discussions

The Code Administrator will provide a summary of the Panel discussions that inform any decisions taken. This will include a record of Panel’s views on the representations, the outcome of any votes and, where alternates exist, Panel’s preference.

Discussion

Insert text here

Consideration of the Relevant Objectives

Insert text here

Determinations

Insert text here

12 Recommendations

Panel Determination Self-Governance

Members agreed:

- that Modification 135 should [not] be implemented