

Final Modification Report		At what stage is this document in the process?
<h1>IGT157:</h1> <h2>Adding Local Authorities as a new User Type to the Data Permissions Matrix</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;">01 Modification</div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;">02 Workgroup Report</div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;">03 Draft Modification Report</div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px; background-color: #f4a460;">04 Final Modification Report</div> </div>
<p><b>Purpose of Modification:</b></p> <p>Local Authorities (LAs) have an ambition to lead the reduction of carbon emissions in their locality, often to meet net zero target dates that are accelerated ahead of the UK's legally binding target date of 2050. To carry out this ambition LAs need to access data relating predominantly to consumers addresses and gas usage in order to target engagement with such consumers and monitor strategy outcomes. This Modification seeks to amend the UNC Data Permissions Matrix (DPM) to add LAs as a new User type.</p>		
	<p>Panel consideration is due on <b>27th August 2021</b></p> <p>The Panel recommends implementation <i>(or)</i></p>	
	<p>The Panel does not recommend implementation <i>(or)</i></p>	
	<p>High Impact:</p>	
	<p>Medium Impact:</p>	
	<p>Low Impact:</p> <p>Shippers, Transporters</p>	

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 Any questions?

Contact:  
Code Administrator

 iGTUNC@Gems  
erv.com

 02070901044

Proposer:  
Cher Harris

 cher.harris@sse.com

 07747559101

Timeline

**Modification timetable:**

Initial consideration by Workgroup	08 July 2021
Amended Modification considered by Workgroup	dd month year
Workgroup Report presented to Panel	25 June 2021
Draft Modification Report issued for consultation	27 August 2021
Consultation Close-out for representations	20 September 2021
Variation Request presented to Panel	dd month year
Final Modification Report available for Panel	17 September 2021
Modification Panel decision	24 September 2021

## 1 Summary

### What

LAs have an ambition to lead the reduction of carbon emissions in their locality, often to meet net zero target dates that are accelerated ahead of the UK's legally binding target date of 2050. They have approached Cadent to request information to help them target reduction strategies and provide visibility on what progress they are making against their goals.

LAs are asking for business names/addresses, customer type (commercial/industrial) their associated standard industrial classification code and their annual gas usage in kWh. They are also asking for post code level gas usage for all users (which can be aggregated).

### Why

This modification is required in order to add LAs as a new User type to the DPM.

### How

This enabling Modification proposes to add LAs to the DPM to allow Data Services Contract Management Committee to determine which data items can be provided.

## 2 Governance

### Justification for Urgency, Self-Governance or Fast Track Self-Governance

This is an enabling Modification only which is proposed as Self-Governance as it will not impact competition, discriminate between users, or have a negative impact on consumers.

### Requested Next Steps

This modification should:

- be subject to self-governance
- proceed to Consultation

### Workgroup Comments

The Workgroup supports the proposer's view that the Modification is an enabling Modification and will not impact competition, discriminate between users, or have a negative impact on consumers.

## 3 Why Change?

LAs have an ambition to lead the reduction of carbon emissions in their locality, often to meet net zero target dates that are accelerated ahead of the UK's legally binding target date of 2050. They are putting into place, plans to drive emissions reductions and want to be able to track progress against their carbon reduction goals. They also want to target engagement with consumers to change behaviours which could

lead to a reduction in emissions.

LAs have approached Cadent and asked us to work alongside them to support their carbon emission reduction goals by providing access to information that helps them target reduction strategies and provide visibility on what progress they are making against their goals. Electricity Distribution Network Operators are currently working closely with LAs to provide similar information.

LAs would like to understand their largest gas users so that they can approach, and work with them on decarbonisation strategies. They are also keen to have the ability to assess the outcome of their interventions year on year to demonstrate progress on gas reduction usage over time. Tracking consumption over time will give them an indication of whether their carbon emissions reductions strategies are working or not.

LAs are seeking information such as business names/addresses, customer type (commercial/industrial) and their annual gas usage in kwh. They are also asking for post code level gas usage for all users. Without access to the required data, LAs will not be able to work with their largest gas users on decarbonisation plans and subsequently will not be able to see if their interventions on properties (insulation, etc) is showing any benefit.

If access to the required data is not forthcoming there is the possibility that the gas industry may be seen as a blocker to carbon emissions reductions. We are also aware that it is proposed within the REC v3 Data Access Schedule that Local Authorities will be permitted access to data via both the Electricity and Gas Enquiry Services.

## 4 Code Specific Matters

### Technical Skillsets

None identified

### Reference Documents

The Data Permission Matrix (which includes the Conditionality Document) is published on Xoserve.com.

## 5 Solution

This Modification will add LAs to the Data Permission Matrix.

For the avoidance of doubt requests to access UK Link Data and issues regarding how released data is used and any controls required to mitigate against misuse, are managed through the Data Services Contract Management Committee and third-party services contract between Xoserve and the LAs and are not included in the scope of this Modification.

## Workgroup Comments

The Workgroup believe this solution meets the requirements of the Modification to add LAs to the Data Permissions Matrix.

## 6 Impacts & Other Considerations

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

This Modification does not impact an SCR nor a significant industry change.

### Consumer Impacts

Data relating to all consumers groups would be available if specified in the reporting and sanctioned by Data Services Contract Management Committee.

Potential for reduction in end user energy costs if gas reduction strategies are successful.

#### Impact of the change on Consumer Benefit Areas

Area	Identified Impact
Improved safety and reliability	None
<p>Lower bills than would otherwise be the case</p> <p><b>The Workgroup</b> believe that the specific use cases that will be requested by LAs will be in support of the LAs Net Zero targets and any scrutiny of energy efficiency and carbon consumption is likely to lead to a reduction in usage. <b>The Workgroup</b> felt that there would lead to lower consumer bills thereby having a positive impact.</p>	Positive
<p>Reduced environmental damage</p> <p><b>The Workgroup</b> believe that any reduction in carbon usage will have a positive impact on the environment by lowering greenhouse gas emissions.</p>	Positive
Improved quality of service	None
<p>Benefits for society as a whole</p> <p><b>The Workgroup</b> believe that any positive impact on the Net Zero target for the U.K. will have a benefit to society as a whole.</p>	Positive

### Cross-Code Impacts

This Modification relates to UNC Modification 0769.

**The Workgroup** believes that whilst it is related to the UNC Modification 0769 it is not dependent on it. It would be beneficial to implement both modification at the same time but this modification can be implemented independently of the UNC modification.

## Environmental Impacts

This enabling Modification would allow LAs access to Consumer information to enable collaborative working with the aim of reducing carbon emissions

**The Workgroup** believes that the LAs intend to obtain data to support their Net Zero targets and any reduction in Carbon usage will have a positive impact on the environment by reducing greenhouse gas emissions.

## Workgroup Impact Assessment

Please see the **Workgroup comments** beneath the individual sections above.

## 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 Modification provides a more efficient means for the CDSP to release data to LAs consistent with the principle of development of the DPM. This is consistent with other similar changes for the release of Data to identified organisations listed in the DPM, with the actual data to be released to be agreed via the process established by the Data Services Contract Management Committee and therefore further

Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code.

### Workgroup Comments

The Workgroup believe the modification has a positive impact on Relevant Objective (F) and agree with the reasons offered by the proposer.

## 8 Implementation

Implementation should be aligned, as far as possible, with equivalent UNC Modification 0769.

### Workgroup Comments

The Workgroup agreed that the implementation should be aligned with equivalent UNC Modification 0769.

## 9 Legal Text

### Text Commentary

No Legal Text is required as this is simply an enabling Modification as required by UNC TPD V5.5.2(j).

### Workgroup Comments

The Workgroup were satisfied that the Modification does not require legal text as IGT157 is an enabling Modification.

## 10 Consultation

Panel invited representations from interested parties on 27<sup>th</sup> August 2021.

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
BUUK Infrastructure	Support	F - positive	<ul style="list-style-type: none"> <li>We are in support of this modification and agree that it is a self-governance Modification. Though this mod is only an enabler mod and requires Local Authorities (LAs) to go through the relevant process to access the relevant data should this be approved. It's worth noting whether there should be consideration that customers should have the ability to consent to</li> </ul>

			<p>the data that LAs want access to.</p> <ul style="list-style-type: none"> <li>• We also believe that the modification will enable LAs to access data that will help towards reduced environmental damage and potentially lead to lower consumer bills</li> <li>• We agree with the Panel’s determination that this is a self-governance modification</li> <li>• There should be some consideration for the ability of customers to give consent for their information to be shared with LAs</li> <li>• We agree with the proposer that the relevant objective (F) (Promotion of efficiency in the implementation and administration of the Code) will be impacted positively as reflected in the modification</li> <li>• BUUK does not envisage incurring any on-going development and costs</li> <li>• The implementation should be aligned with equivalent UNC Modification 0769 to avoid any cross-code implications and delays</li> <li>• There was no requirement for any legal text as this only an enabling modification</li> <li>• Concern regarding whether the LAs could/would use the data for evidence to monitor net zero targets and prosecute however, these has been mitigated by the fact that this modification will only be to enable LAs ability to seek information via the Central Data Service Provider (CDSP). Worth noting that LAs could be capable of misuse of the data that they obtain from the CDSP. The existing framework should be robust enough to deal with this</li> </ul>
<p>Energy Assets Pipelines</p>	<p>Support</p>	<p>F - positive</p>	<ul style="list-style-type: none"> <li>• This modification will enable Local Authorities to access gas market data, which is intended to support them in meeting their NetZero obligations. The actual data they will be able to access will be controlled by the DSC Contract Management Committee which is expected to have due regard to matters such as data protection</li> <li>• We agree self-governance is appropriate: there is no impact on competition, it does not discriminate between users and it will not have</li> </ul>

			<p>a negative impact on consumers</p> <ul style="list-style-type: none"> <li>We consider that this Modification furthers relevant objective (F) (Promotion of efficiency in the implementation and administration of the Code) as it provides an efficient mechanism for arranging release of data to Local Authorities</li> <li>This Modification can be implemented in the next available release</li> </ul>
Indigo Pipelines Ltd	Support	F - positive	<ul style="list-style-type: none"> <li>We accept that Local Authorities will need consumption data relating to their local area in order to implement targeted carbon reduction initiatives, so that the UK can achieve its Net Zero ambitions</li> <li>We agree with the proposer that this modification should be progressed as Self-Governance</li> <li>Supports Objective (F) (Promotion of efficiency in the implementation and administration of the Code) in so far as it provides an efficient way of authorising the release of data to external parties</li> <li>Implementation should aim to align with UNC equivalent Mod 0769</li> </ul>

## Summary

Three responses were received to the consultation for IGT157, all of which were from Pipeline Operators and none from a Pipeline User;

All three respondents offered full support for the modification and agree it is a self-governance modification;

All agreed this modification met the Relevant Objective F (Promotion of efficiency in the implementation and administration of the Code);

It was agreed that the implementation should be aligned with the equivalent UNC Modification 0769 - Adding Local Authorities as a new User Type to the Data Permissions Matrix and in the next available release;

One responded agreed there was no requirement for any legal text as this was only an enabling modification, the other two respondents did not comment on the legal text.

Two respondents indicated that there should be due regard to Data Protection when the decision is taken about what data is to be released and how permissions might be obtained if necessary.

## 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 Recommendation [to Authority]

Members recommended:

- that Modification 157 should [not] be implemented

*The Code Administrator may set alternative subheadings appropriate to the specific Code.*

### Insert subheading here

Insert text here