

Issue 101 Workgroup Meeting 6 Summary

Summary

The Chair welcomed attendees and presented the meeting objectives:

- Confirm data governance design and documentation that will be/has been created by the MHHS Programme
- Agree data governance that will be in place once the DIP enters the 'operate and run' phase and what will be produced from Issue 101
- Seek feedback on initial view of role of BSCCo as Data Processor in carrying out DIP Manager role

Topic	WG Position
Responsibility for data	A WG member questioned who would be responsible for ensuring data was sent to the correct recipient where flows were addressed to certain participants. It was confirmed that this would be the responsibility of the sender, as the DIP will not have that information.
Data Privacy Impact Assessment (DPIA)	A WG member questioned whether each DIP user would need to have a DPIA in place, and whether this would be part of the onboarding process. Elexon confirmed that everyone will need data protection considerations in place as part of onboarding, as they will be the data controllers. How DPIAs are handled for existing parties in the market is under consideration.
Systems Integration Testing (SIT)	A WG member questioned whether participants joining SIT was a dependency for the Programme, and whether a gap analysis for SIT users may be required. The Programme commented that DPIA for testing is in the plan, but that for testing with synthetic data a DPIA would not be required.
DIP Manager role	Elexon shared the view that the DIP Manager would be the data processor, as opposed to the data controller, due to the fact that they would merely receive data and pass it on. A WG Member commented that the DIP Manager could be a data controller as they have control of who is engaging with the DIP, including responsibility for onboarding and exiting users of the system, and governance of acceptable use of the system. They also felt that during a data breach it may be useful for the DIP Manager to act as the data controller. Elexon questioned if it would provide more comfort from a governance perspective if the DIP Manager were to take a more active role following a data breach. The WG member felt it would make sense for DIP Manager to take a more active role, given the practicalities of how many parties could be involved. Elexon also noted that activities surrounding a data breach would be included in the wider incident response plan.
Data Best Practice Guidance	Elexon presented the Data Best Practice Guidelines, published by Ofgem, with explanation of how they would be incorporated into the DIP. The WG had no objections or questions.
Open Data Requests and Message replays	<p>A WG member questioned how data requests would work when DIP was not intended to store lots of data. Elexon explained that within DIP there would be a message store and reporting functionality, so there will be ability to run reports. The DIP Manager may be able to access data and meet data access requests. The DIP Manager's process will also form guidance for DIP users, so that if they receive a request for their DIP data, they can utilise a similar process.</p> <p>A WG member questioned how message replay would work for the DIP. A representative from the Programme explained that messages are stored for a configurable retention time. This is currently set to two years, but that value is arbitrary and not finalised. There is a simple filter to identify which messages a participant will be sent. Message replay functionality allows a user to request data that they are entitled to and have already seen. This is separate from an open data request.</p>

Topic	WG Position
Data Request Costs	The Programme reported that the message store is not a huge factor for the costs as the messages are compressed. Elexon confirmed that if there is a cost associated with retrieving data then this cost could be passed onto the participant making the request, but this would be determined by the DIP Board. A WG member supported the idea for data requests to pay on demand. Elexon presented a proposed open data process, which included a threshold for DIP Board decision of £150k, based on the equivalent BSC Panel threshold. The WG felt that this threshold should be lower, as DIP technology is meant to be the latest and most cost effective and therefore the cost should not be that high.
Open Data Process	A WG member questioned whether someone who is not entitled to receive specific data could request it. Elexon explained that anyone can request anything, but if they have no right to see it then they may not be granted access. Any data shared with those without permissions to view it would have to be declassified.

Actions

No.	Action	Owner
1.	Consider if there may be similarities to between DIP Manager and RECCo processes in terms of being the data controller.	Elexon
2.	Elexon to share plan for Issue 101, including document reviews	Elexon