

## Representation - Draft Modification Report 0593

### Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries

Responses invited by: **5pm on 09 February 2017**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Mark Jones
<b>Organisation:</b>	SSE Supply
<b>Date of Representation:</b>	09 February 2017
<b>Support or oppose implementation?</b>	Qualified Support
<b>Relevant Objective:</b>	d) Positive

**Reason for support/opposition:** Please summarise (in one paragraph) the key reason(s)

We support the intent of the modification as The CMA issued its Energy Market investigation final report in June 2016 which gave reasons for erroneous transfers and failed customer switches, and concluded that there is a requirement for PCWs / TPIs to be given access to data with the same conditions and in the same manner as is currently the case for suppliers. This will allow them to check or obtain MPRNs for consumers seeking to switch supplier and to check other information provided by these consumers.

However, there are serious concerns that the system solution proposed does not have the required Data Protection security and reporting around the accessing and use of the data for its intended purposes. We are of the strong opinion that the system implemented must have these safeguards in place, together with proper audit measures to ensure that customer data is not misused and also that only data related to those customer types mentioned within the CMA report is able to be accessed.

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

The modification could be implemented as soon as possible.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

None identified.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes.

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: To inform Panel's consideration of self-governance, views are requested as to whether respondents believe that releasing these data items represents a material impact on competition between, or commercial arrangements for, Shippers or Transporters. Please provide evidence to support your response.*

We agree with both The Panel and the Workgroup that this modification does not meet the self-governance criteria due to the impact that the service can potentially have on market competition.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

No.

**Please provide below any additional analysis or information to support your representation**

iGT UNC processes may mean permissions through this route will not exist by 28th February which would compromise Xoserve's ability to deliver access for iGT sites (access is for GT and iGT data and cannot be separated in the timescales).