

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

Representative:	Robert Cameron-Higgs
Organisation:	Flow Energy
Date of Representation:	09 February 2017
Support or oppose implementation?	Qualified Support <i>delete as appropriate</i>
Relevant Objective:	d) Positive * <i>delete as appropriate</i>

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

Flow Energy offers qualified support for this proposal. There are serious misgivings amongst certain organisations that the proposal is flawed with respect to its perceived weakness or ambiguity around Data Protection. I have read nothing conclusive to underpin these concerns and would fully expect Ofgem to consider all representations and the points made before making a final determination on this specific proposal, and to cover these concerns in any decision letter. If it is deemed suitable, then our support for the rationale and aspiration of the proposal is positive.

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

N/A

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

We have not had the text checked by a qualified lawyer to assess the concerns of other parties

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.

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.*

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