

UNC Modification	At what stage is this document in the process?
<h1>UNC 0640:</h1> <h2>Provision of access to Domestic Consumer data for Suppliers</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #008000; color: white; padding: 5px; display: flex; justify-content: space-between; align-items: center;"> 01 Modification </div> <div style="border: 1px solid blue; padding: 5px; display: flex; justify-content: space-between; align-items: center;"> 02 Workgroup Report </div> <div style="border: 1px solid purple; padding: 5px; display: flex; justify-content: space-between; align-items: center;"> 03 Draft Modification Report </div> <div style="border: 1px solid orange; padding: 5px; display: flex; justify-content: space-between; align-items: center;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>This is an enabling modification, which seeks to create the necessary permissions in the Uniform Network Code (UNC) to permit the release of domestic consumer data to Suppliers similar to the current arrangements that are in place for Price Comparison Websites (PCWs) (as per UNC Modification 0593 - Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries).</p> <p>The release of data is subject to validations undertaken by the Transporter and would be pursuant to data protection principles.</p>	
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> • subject to self-governance • assessed by a Workgroup. <p>This modification will be presented by the Proposer to the Panel on 21 December 2017. The Panel will consider the Proposer’s recommendation and determine the appropriate route.</p>
	<p>Low Impact: CDSP</p>

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Timetable	
The Proposer recommends the following timetable:	
Initial consideration by Panel	21 December 2017
Amended Modification considered by Workgroup	05 January 2018
Workgroup Report presented to Panel	18 January 2018
Draft Modification Report issued for consultation	18 January 2018
Consultation Close-out for representations	07 February 2018
Variation Request presented to Panel	N/A
Final Modification Report available for Panel	14 February 2018
Modification Panel decision	22 February 2018

 **Any questions?**

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1 Summary

What

This is an enabling modification seeking to grant permission to release domestic consumer data to Suppliers. This modification seeks to extend the services that are available to PCWs under UNC Modification 0593 to Suppliers.

Why

PCWs are entitled access to domestic consumer data via an Application Programming Interface (API) service (permissions for this are specified within UNC Modification 0593). Suppliers also offer comparison services to end consumers and would therefore benefit from the same API services available to PCWs. This modification is raised to create the necessary permissions in the UNC code to facilitate this.

How

In order to allow Suppliers to be permitted access to domestic consumer data, the necessary permission and any restrictions or requirements on Suppliers needs to be created within the UNC.

2 Governance

Justification for Self-Governance

This modification is considered Self- Governance as it is simply allowing the release of data (subject to pre-defined conditions – as per section 3) to Suppliers.

Requested Next Steps

This modification should:

- be considered a non-material change and subject to self-governance
- be assessed by a Workgroup.

3 Why Change?

Suppliers currently do not have access to the same service being provisioned for PCWs under UNC Modification 0593. However, Suppliers also offer comparison services to end consumers and would, therefore, benefit from the same data provisions available to PCWs.

This modification has, therefore, been raised to grant Suppliers access, upon request (subject to reasonable access conditions to data as listed below), to assist consumers seeking to switch.

The data to be accessed is:

- Supply Meter Point Reference Number,
- supply point address,
- Meter Post Code,

- Current supplier ID,
- meter mechanism code,
- network operator,
- meter capacity,
- meter serial number,
- Annual Quantity,
- Local Distribution Zone,
- Smart Meter Equipment Technical code.

This modification would, with sufficient controls in place, grant permissions to the above data, for Suppliers.

The confidentiality and service agreements are not to be included in the UNC solution itself; however, in order to ensure compliance of the data in accordance with the Data Protection Act, Suppliers will be subject to, but not limited to, the following principles which will be solidified in a forthcoming service build:

- Legitimate justification will be required by Suppliers for accessing this information. This will be subject to confidentiality agreements between Suppliers and the Gas Transporters, and a contract with the CDSP for the provision of the service.
- Suppliers access to data will be subject to organisational validations and conditions, as set out in legal contracts between Suppliers and the CDSP. The relevant section of the UNC will be amended to include the definition of Suppliers.
- The data provided is confidential information and is, therefore, only permitted to be accessed by Suppliers (subject to organisational validations) where consent has been obtained from the relevant consumer, through a clear statement of consent on the Suppliers website, which will be required to be actively triggered by a consumer.
- Consumer consent and data accessed by Suppliers will be securely held by Suppliers for no longer than reasonably required to comply with relevant legislation.
- The CDSP has the right to audit Suppliers, without notice, to ensure data is being used solely, with consumer consent, for the purposes of facilitating change of Supplier activity.
- The CDSP has the right to request Suppliers to produce evidence of the following information, but are not limited to only this information: consumer consent, data obtained, time periods data was obtained for, switching evidence (if switch took place), and data retention policies.
- Where any suspected misuse comes to the attention of the CDSP, including via a third party or an audit or security investigation, then the CDSP has the right (after appropriate investigation) to cancel provisions of access to data to the Supplier.
- If any of the evidence requested by the CDSP, as specified within the UNC and legal contracts, is not provided within a reasonable timeframe, then the CDSP has the right to immediately cancel provisions of access to data to the Supplier.

The proposer believes that this modification should be considered as 'enabling' since the change would mainly be of benefit to Suppliers, which are not Code parties and therefore, of indirect benefit to UNC parties.

4 Code Specific Matters

Reference Documents

Please find the link for UNC Modification 0593 here;

<https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2017-09/Final%20Modification%20Report%200593V%20%28including%20Supplemental%20Report%29%20v2.0.pdf>

Please also find attached the link to the API technical compliance document provided to support UNC Modification 0593;

https://www.gasgovernance.co.uk/sites/default/files/ggf/book/2017-11/%5B11.3.1%5D%20Evidence%20-%20API%20compliance%20document_0.pdf

Knowledge/Skills

No specific knowledge or skills required to consider this modification.

5 Solution

This enabling modification is proposing to grant the relevant permissions to allow Suppliers access to domestic consumer data through amending UNC Section V to include a requirement on the Suppliers to enter into a confidentiality and service agreements with the Transporters on terms no less onerous than those of TPD Section V5, but including clauses detailing the data and permitted purpose, and clauses to include enforcement of the confidentiality agreement.

The data to be included is:

- Supply Meter Point Reference Number,
- Supply Point Address,
- Meter Post Code,
- Current Supplier ID,
- Meter Mechanism Code,
- Network Operator,
- Meter Capacity,
- Meter Serial Number,
- Annual Quantity,
- Local Distribution Zone,
- Smart Meter Equipment Technical Code.

This data is to be obtained specifically for the purpose of enabling a change of supplier event in response to a specific request from a consumer.

In order to provide the industry with transparency of the use of this data, an annual report will be provided detailing the Supplier market participants who are permitted to access this data.

This modification, once implemented, will grant the necessary permissions for the creation of a commercial service which will provide access to domestic consumer data only for the sole purpose of aiding in faster supplier switching. Domestic data is identified using the market sector code 'D'.

6 Impacts & Other Considerations

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

This requirement may be transitional until the SCR is implemented where Suppliers may be able to access the data from the new Central Registration Service (CRS).

Consumer Impacts

Criteria	Extent of Impact
Which Consumer groups are affected?	Domestic Consumers
What costs or benefits will pass through to them?	<p>It is not anticipated that any costs will be passed through to Consumers. Services facilitated by this modification will be provided using bilateral arrangements between the CDSP and Supplier</p> <p>This modification facilitates the provision of data that should allow Domestic consumers to be better engaged and able to understand and choose between the range of options available to them through Supplier services, offered both online and by telephone.</p>
When will these costs/benefits impact upon consumers?	Immediately following the implementation of the services provided by Transporters, on a date to be provided.
Are there any other Consumer Impacts?	None identified.

Cross Code Impacts

It is assumed this service would also be required within Electricity; it is believed that the relevant permissions are already in place within the Master Registration Agreement (MRA).

However, an equivalent iGT UNC modification will be required mirroring the UNC modification.

EU Code Impacts

None.

Central Systems Impacts

It is proposed to deliver an API system solution to allow access to data by PCWs and these changes will be managed through the DSC Change Management Procedures.

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) Coordinated, 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 arrangements with other relevant gas transporters) and relevant shippers.	Positive
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.	None
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

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.

9 Legal Text

No text has been provided.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that self-governance procedures should apply
- Refer this proposal to a Workgroup for assessment.