

Representation - Draft Modification Report UNC 0640S

Provision of access to Domestic Consumer data for Suppliers

Responses invited by: **5pm on 08 March 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	6 th March 2018
Support or oppose implementation?	Support
Relevant Objective:	d) (ii) Positive

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

We support this modification because it clarifies that information listed in the proposal may be provided to Suppliers as well as PCWs and TPIs. We believe that this result could also probably have been achieved by a change to SPAA which is a contract between Domestic Suppliers and some Non Domestic Suppliers and DNOs and IGTs; however we accept that having the provision in the same place (albeit not expressed in the same way) as the provision relating to PCWs and TPIs may be beneficial for UNC parties.

Self-Governance Statement: Please provide your views on the self-governance statement.

Although we believe that the relevant objective is d (ii) we do not believe that it will have a material effect on competition and therefore self-governance should apply.

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

We agree that it could be implemented 16 days after a panel determination to implement it.

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

None

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

Yes

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

We note the comments in the legal text commentary regarding whether the arrangements on TPD V5 should move into the Data Services Contract. We consider that, since the DSC includes Shippers, Transporters and the CDSP as parties this is worthy of consideration at a future date.