Representation - Draft Modification Report 0593V	
Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries	
Responses invited by: 5pm on 08 September 2017	
To: enquiries@gasgovernance.co.uk	
Representative:	Fraser Mathieson
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	7 th September 2017
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

SGN supports Modification 0593 as it seeks to create the necessary permissions within the UNC to allow Xoserve to provide access for Price Comparison Websites and Third Party Intermediaries to certain data items related to specific MPRNs, following the Competition and Markets Authority's *Energy Market Investigation (ECOES/DES) Order* 2016¹.

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

Implementation should be as soon as possible following Authority decision.

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

There will be some minimal costs incurred in order to implement the technical solution, for which funding will need to be agreed.

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

Yes.

¹ <u>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/585019/energy-market-ECOES-DES-order-2016.pdf</u> [Retrieved 05/09/17].

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

Q1: To inform Panel's consideration of the varied modification, views are requested as to whether you agree that Ofgem's sendback questions have been addressed in the revised modification.

We note the importance of the supplemental workgroup report, which we consider addresses the concerns raised regarding the technical solution.

We would expect that the DSC Change Committee takes full regard of this report when taking decisions regarding the implemented solution, and should ensure that all recommended safeguards are in place.

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

N/A.