UNC Workgroup 0574S Minutes Creating the permission to release supply point data to the Theft Risk Assessment Service (TRAS)

Thursday 28 April 2016

at Energy UK, 5-11 Regent Street, London, SW1Y 4LR

Attendees

| Bob Fletcher (Chair) | (BF) | Joint Office |
|-----------------------------|-------|----------------------------|
| Mike Berrisford (Secretary) | (MB) | Joint Office |
| Alex Ross-Shaw | (ARS) | Northern Gas Networks |
| Andrew Margan* | (AM) | British Gas |
| Andy Clasper | (AC) | National Grid Distribution |
| Angela Love | (AL) | ScottishPower |
| Anne Jackson | (AJ) | SSE |
| Chris Warner | (CW) | National Grid Distribution |
| Colette Baldwin | (CB) | E.ON UK |
| Colin Blair | (CBI) | ScottishPower |
| Dave Addison* | (DA) | Xoserve |
| David Mitchell | (DM) | Scotia Gas Networks |
| Gavin Anderson* | (GA) | EDF Energy |
| Hilary Chapman | (HC) | Scotia Gas Networks |
| John Welch* | (JW) | RWE npower |
| Kirsten Elliott-Smith | (KES) | Cornwall Energy |
| Naomi Nathanael | (NN) | Plus Shipping |
| Rachel Hinsley | (RH) | Xoserve |
| Richard Pomroy* | (RP) | Wales & West Utilities |
| Sasha Pearce | (SP) | npower |
| Simon Harrison | (SH) | Experian |
| Suchitra Hammond | (SHa) | Ofgem |
| Steve Mullinganie | (SM) | Gazprom |
| | | |

^{*} via teleconference

Copies of all papers are available at: http://www.gasgovernance.co.uk/0574/280416

The Workgroup Report is due to be presented at the UNC Modification Panel by 16 June 2016.

1.0 Introduction and Status Review

1.1 Review of Minutes (24 March 2016)

The minutes of the previous meeting were approved.

2.0 Discussion

Opening the proceedings, SP provided a brief resume of the discussions undertaken at the previous meeting, which then generated an offline discussion between Experian, npower and E.ON.

SH explained why Experian feel that the data items are needed as issues with data matching have come to light (in the order of 15 – 20% of records). In looking to enhance

Supplier supplied data (i.e. address related information etc.), SH made reference to the fact that the electricity side of the market has already agreed to provide additional data which would / could be utilised and merged with the existing data to work towards mitigating any mismatches in the data. SHa agreed that this data is going to be provided in Electricity and Ofgem had no concerns provided the usual safeguards were in place concerning data protection. Additionally, SHa believes that as this data will be used for reconciliation purposes against data that is already provided elsewhere, and as such data is provided in Electricity, and given the CMA provisional remedy that seeks to allow access for third parties to such data via enquiry services in both gas and electricity, she does not see why permission should not be given to release the data. SHa also felt that this could progress as a self-governance modification.

When asked, SH confirmed that Suppliers do provide multiple address related information (for the same property), where this information exists.

Some parties suggested that this is in essence an 'enabling' modification and should Transporters have any concerns they could always highlight these within their respective consultation responses in due course, especially when there are no real industry concerns around the Suppliers providing sufficient information – in short, whilst the information might be used to correct or reduce inconsistencies, it is supporting Supplier data and not replacing it.

When asked, SH confirmed that the information provided would only be utilised for TRAS specific purposes before explaining how it would be utilised for cross matching purposes. SP also confirmed that as far as any confidentiality related requirements were concerned, these would be managed via the normal Xoserve route.

When asked whether or not Shippers would have any input on what information can be passed over, it was pointed out that this is primarily a Transporter information provision related matter. SM suggested that at the end of the day if the data is found by checking to be of little meaningful use, the provision could be ceased and it is likely that as part of the process Experian would review this on a regular basis. SH advised that Experian would be monitoring the situation and would be more than happy to provide suitable feedback on what it finds.

As discussions progressed some parties voiced their concerns relating to potential data protection impacts and suggested that further consideration is needed.

When asked how the provision would be funded, SP explained that this would be in the form of a nominal charge applied for the quarterly DVD that Experian would expect to cover. It was noted that as this constitutes a Non Code User Pays service, and Xoserve would establish the contractual arrangements. DA advised that he would look to discuss the DVD data items with SP offline (schedule 23 and SPAA considerations).

When asked SHa confirmed that Ofgem would like to see the gas market following the electricity market lead on this matter, as it forms a precursor to future developments.

When challenged, ARS explained that he would be discussing the provision of legal text associated with this modification with his lawyers in order to look to providing (draft) legal text in time for consideration at the next meeting.

New Action 0574 0401: Northern Gas Networks (ARS) to provide draft legal text in time for consideration at the 26 May 2016 Workgroup meeting.

New Action 0574 0402: Xoserve (DA) and npower (SP) to discuss the DVD data items offline, including whether or not LDZ information is also on the DVD and also whether or not any schedule 23 and SPAA considerations are required.

3.0 Review of outstanding actions

Action 0301: RWE npower (SP) to document data concerns/issues and arrange for Experian to present at the meeting on 28 April 2016, to provide clarity on the data requirements and usage.

Update: It was agreed that this action could now be closed. Closed

4.0 Next Steps

Workgroup to provide views on both the potential Data Protection related impacts and legal text at the 26 May meeting.

5.0 Any Other Business

None raised.

6.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/Diary

Workgroup meetings will take place as follows:

| Time / Date | Venue | Workgroup Programme |
|-------------------------------|---|---|
| 10:30 Thursday 26 May 2016 | Consort House, 6 Homer Road, Solihull, B91 3QQ | Detail planned agenda items. consideration of potential data protection issues / impacts consideration of draft legal text development of draft Workgroup Report |

Action Table (28 April 2016)

| Action Ref | Meeting Date | Minute Ref | Action | Owner | Status Update |
|---------------|-----------------|---------------|--|--------------------------------------|-------------------------------|
| 0301 | 24/03/16 | 2.1 | RWE npower (SP) to document data concerns/issues and arrange for Experian to present at the meeting on 28 April 2016, to provide clarity on the data requirements and usage. | RWE npower (SP) | Update provided. Closed |
| 0401 | 28/04/16 | 2.0 | To provide draft legal text in time for consideration at the 26 May 2016 Workgroup meeting. | Northern Gas Networks (ARS) | Pending |
| 0402 | 28/04/16 | 2.0 | To discuss the DVD data items offline, including whether or not LDZ information is also on the DVD and also whether or not any schedule 23 and SPAA considerations are required. | Xoserve (DA) & npower (SP) | Pending |