

Representation

Draft Modification Report

0386 – Extending rights to Protected Information provisions for Meter Asset Managers / Registered Metering Applicants – unpopulated MAM id records

Consultation close out date: 02 September 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: Npower Limited
Representative: Sasha Pearce
Date of Representation: 2 September 2011

Do you support or oppose implementation?

Qualified support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

Blank MAM ids have been a long-standing industry problem and this change should provide MAMs with a way of addressing this. It should therefore lead to some improvement in industry data quality. However, we are still investigating whether there are any potential Data Protection implications of allowing MAMs access to this data, hence we can only offer qualified support at the moment.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

Yes. It would be helpful for the Modification Report to include a view on the Data Protection implications of giving MAMs access to this data, which after all is classed as personal data under the Data Protection Act.

This is an enabling modification, in that it facilitates the provision of information by the Transporters' Agent to enquiring MAMs. We assume that this will be a telephone service – could this be made explicit in the Modification Report?

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

Yes.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We consider that this Modification better facilitates relevant objective (d) by improving data quality, and should also reduce industry costs.

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

None.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

As soon as possible, however there needs to be time to put processes in place for MAMs to communicate with suppliers where there is no existing contractual relationship.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

As already stated, we are still considering whether there are any Data Protection implications in providing these data items to MAMs.

Whilst this modification provides a helpful remedy for an existing problem, it does not provide a cure. It clearly does not provide a solution to the data quality issues faced by the industry in this area.