

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:	Shanna Key
Organisation:	Northern Gas Networks
Date of Representation:	30/08/2017
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

NGN supports this permissions modification as it will allow for the creation of a commercial service which meets the CMA Order to allow PCW access to Domestic Consumer Data via an agreed API solution.

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

We believe this modification should be implemented as soon as reasonably practicable after the receipt of Authority consent.

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

The CMA Order is also on electricity, meaning changes will also need to be made to the MRA. However, these solutions are not required to match or depend on one another. There is also an iGT modification (iGT UNC 095) which mostly mirrors Modification 0593 and has been developed alongside it.

Parties should not incur additional costs from this modification as it is permissions only. Any development funding and its source for the API solution will be determined via the DSC Change Management Committee.

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

We agree that the legal text is reflective of the modification solution.

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 send-back questions have been addressed in the revised modification.

We believe that Ofgem's concerns have been addressed with the change from access to data via online DES to data via a specially designed API solution.

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.*

N/A

Please provide below any additional analysis or information to support your representation

N/A