

Representation - Draft Modification Report UNC 0649S

Update to UNC to formalise the Data Permissions Matrix

Responses invited by: 5pm on 11 October 2017

To: enquiries@gasgovernance.co.uk

Representative:	Rob Johnson
Organisation:	ES Pipelines Ltd
Date of Representation:	11/10/2018
Support or oppose implementation?	Qualified Support
Relevant Objective:	Positive

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

ES Pipelines supports the notion of improving efficiency in the change process for the UNC and is in general in support of this proposal. We do have some concerns regarding the appropriateness of the solution as we believe that all due care and diligence should be taken with any decision to alter data permissions.

ES Pipelines recommends that in the process to alter data permissions that Contract Management Committee must also consult with the Change Management Committee before making a decision. Our rationale for this is because it is within the Change Management Committee's remit to deliberate on change /new service requests and also to provide the basis on which a change or modification may be proposed.

We would also suggest that the Contract Management Committee have the ability to pass a decision to alter data permissions over to the UNC (and IGT UNC) if they are unable to make a decision for any reason, meaning that a modification would have to be raised.

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

ESP does not believe that this modification is suitable for self-governance. The decision to alter data permissions via the API to businesses such as Suppliers or Price Comparison Websites could have an effect on the choice available in the market place and therefore competition. If such a decision is made imprudently, these effects could be negative. As such we believe that an authority decision may be required.

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

We believe that this modification can be implemented as soon as practical following a decision to do so but, should coincide with implementation of IGT115.

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

No costs are anticipated with this change.

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

We are satisfied with the legal text.

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.*

We have no further comments.

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

We have no further comments.