

**Consultation Response**

## iGT095 – Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries

Responses invited by: 22 Feb 2017

**Respondent Details**

Name: Mark Jones

Organisation: SSE Supply

Support Implementation

Qualified Support                      X

Neutral

Do Not Support

**Please briefly summarise the key reason(s) for your support / opposition**

We support the intent of the modification as The CMA issued its Energy Market investigation final report in June 2016 which gave reasons for erroneous transfers and failed customer switches, and concluded that there is a requirement for PCWs / TPIs to be given access to data with the same conditions and in the same manner as is currently the case for suppliers. This will allow them to check or obtain MPRNs for consumers seeking to switch supplier and to check other information provided by these consumers.

However, there are serious concerns that the system solution proposed does not have the required Data Protection security and reporting around the accessing and use of the data for its intended purposes. We are of the strong opinion that the system implemented must have these safeguards in place, together with proper audit measures to ensure that customer data is not misused and also that only data related to those customer types mentioned within the CMA report is able to be accessed.

**Self-Governance Statement**

**Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?**

We agree that this modification does not meet the self-governance criteria due to the impact that the service can potentially have on market competition.

**Please state any new or additional issues that you believe should be considered**

There is no separate access to GT and iGT sites under the proposed Industry solution.

**Relevant Objectives**

**How would implementation of this modification impact the relevant objectives?**

We agree with the proposer that the modification would positively impact relevant objective (d)

## Impacts and Costs

**What development and ongoing costs would you face if this modification was implemented?**

None identified.

## Implementation

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

The modification could be implemented as soon as possible.

## Legal Text

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

Yes.

## Further Comments

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

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**