

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: Nicky Rozier

Organisation: BU-UK

Support Implementation ☐

Qualified Support ☐

Neutral ☐

Do Not Support ☒

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

We have raised this modification to follow modification UNC0593 which has already been developed under the UNC. Consequently this has led to a shortened timeframe as an Urgent modification in order to be implemented in line with the CMA Order. IGTs were considered very late in the UNC modification process as it became apparent that IGT data could not be split from GDN data within DES and an iGT UNC modification would therefore be required and need to follow the lead of UNC0593 for consistency. As proposer of the mod, we have acted as a sponsor for the proposal to allow it to enter the IGT UNC modification process. We have a number of concerns with the modification which we outline later in our response.

We would have liked for there to have been wider industry discussion on the overall solution to accessing the data as the DES solution has very much shaped our views on this modification i.e. we were unable to refer to domestic only data within SPAA schedule 23 6.4 due to the limitations of DES.

For these reasons, although we support the intent of this modification we are unable to support it as it stands.

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?

This modification does not meet the criteria for self-governance due to the impacts to end consumers. We acknowledge the requirement of an urgent status in order to facilitate the CMA Order.

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

We have a number of concerns with the modification which are outlined as follows:

1. There has been no iGT UNC Workstream discussion on this proposal due to the late identification of an inability to split IGT and GDN data within DES, consequently compressing iGT UNC timescales.
2. Due to the above, the iGT UNC modification has been shaped by the UNC solution and BU-UK has therefore had limited ability to develop the solution.
3. Referencing SPAA schedule 23 6.4 captures both domestic and I&C data whereas the CMA Order only applies to the domestic data (we understand there is a limitation with DES in being able to split this data). We suggest the Panel considers whether the legal text should be amended prior to submission to Ofgem to restrict the data to 'domestic' gas data under Schedule 23 6.4.
4. Although we acknowledge this is a 'permissions' modification we feel it is intrinsically linked to a DES solution in which we believe there to be potential Data Protection issues.

We are concerned however that the consequences of not having concurrent iGT UNC and UNC modifications available for Ofgem could result in non-compliance with the CMA order as Xoserve would not have permission to provide iGT data within the DES view to PCWs/TPIs.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree this modification facilitates objective d) and has a positive impact on competition between Gas Suppliers through the ability of TPIs to access data to promote the switching process.

Impacts and Costs

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

We do not envisage any costs to iGTs.

Implementation

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

The CMA Order requires the permissions to be in place by 28 February therefore this modification has been raised as an urgent status in order to comply. It will require a reduced lead time for implementation.

Legal Text

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

Although the legal text mirrors the approach taken under the UNC we believe consideration should be given to our suggested amendment as outlined above.

Further Comments

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

We acknowledge Shippers have suggested an ECOES solution is more appropriate due to Data Protection concerns but has been ruled out by GDNs and Xoserve due to restricted timescales and cost involved.

Responses should be submitted by email to iGTUNC@gemserv.com