

iGT UNC / iGT INC Consultation Response

Date	10 th December, 2009
Reference	Mod iGT026
Title	Password Protection Protocols for invoice supporting data and Portfolio Extracts
Respondee	Steph Shepherd, RWE Npower Stephanie.shepherd@npower.com
Position on the Modification	Support Modification

Facilitation of the relevant objectives

We believe that the implementation of this modification proposal will facilitate the promotion of efficiency in the implementation and administration of the Network Code and / or the Uniform Network Code.

This will be delivered through creating a process that reduces Pipeline Operators risk of breach of the Data Protection Act (DPA) in the event of confidential and commercially sensitive information relating to customer Supply Points, (and supporting data where applicable), being received by unintended recipients.

Additional Information and Comments

RWE Npower supports the implementation of this modification proposal, as we believe that it will positively reduce the likelihood of confidential data being sent to a Shipper, (Competitor) in error.

At this point, it is not clear how each Pipeline Operator will plan to implement this modification. We would welcome a uniform approach from all Pipeline Operators rather than multiple processes. However, it is acknowledged that to be able to implement the Mod as soon as is practicable, there will be some variation in delivery, and the Mod has been updated, (Ancillary Document, V0.2) to allow some flexibility. Therefore, it would be advantageous to gain a view from each Pipeline Operator as to how they intend to move forward with the required developments, at the earliest possible opportunity.

Following the meeting between the Pipeline Operators and Pipeline Users held on 5th November, it was generally agreed that the costs of implementing this Mod would be low. However, it should not be assumed that this is the case, and more time may be required for detailed impact assessment on existing processes.

This will also enable Pipeline Users to accommodate the additional workload that this mod is likely to require.

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Npower support the use of WinZip 7 (as referenced in iGTUNC026 Appendix v2.0) as a first preference, or use of web portal as a second.

Should Pipeline Operators have a preference to use a web portal, we would like to make it a necessary requirement of the Mod, for the Pipeline Operators to review the Pipeline Users' with access to this data, at each industry release (as per the dates detailed in the Ancillary document).

This would help to avoid the situation where an Individual User would be able to access the data of a Supplier, of whom they are no longer an Employee.

We welcome the earliest possible implementation date, for this modification.

Completed forms should be returned to the iGT UNC Representative, Gemserv Ltd at iGT-UNC@gemserv.com or faxed to 020 7090 1001