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iGT UNC
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20th September 2017

Attention: Anthony Pygram, Consumers and Competition

Dear Anthony,

Re Decision to send back Uniform Network Code (UNC) 593 (UNC593) and Independent Gas Transporters (IGT) UNC 095 (IGT095): 'Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries'

Thank you for the letter advising of the decision to Send Back the Modifications listed above received on 1st March 2017. Since receipt of the letter, the iGT UNC Modification Panel has reconvened joint working group meetings in conjunction with the UNC Modification Panel. The joint working group has met a further four times since the Send Back decision on the initial Final Modification Report (iGT095).

The workgroup was specifically tasked with addressing the points raised in your letter, and feels that progress has been made across the board. The proposers of the UNC and iGT UNC modifications have each raised a variant to the original modifications following the progression of these discussions. A summary of the discussions at the meetings, key decisions, changes to earlier documentation, and direct responses to your questions raised have been included in the updated Final Modification Report (iGT095VV) sent to Ofgem on 20th September 2017.

Responses to specific questions included in the Send Back letter have been fully set out in Section 11 of the Final Modification Report. The Report also has attached the "Solution Description for Modification 0593 and 095 workgroups" and the "Privacy Impact Assessment" that have been developed and subjected to industry review.

We thank Ofgem for its involvement throughout the workgroup process, and through this involvement Ofgem will be aware that the direction of travel has changed in some respects, and therefore some of the points raised in the Send Back letter have been superseded.

The iGT UNC Modification Panel met on 20th September 2017, and considered that the updated Modification Proposal better facilitates Relevant Objective D – *Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers*, and is suitable for implementation. During the iGT UNC Modification Panel meeting the Panel discussed the subject of possible implementation dates. The Panel suggested that the implementation of iGT095VV should be linked to the implementation, and delivery of the technical and contractual solution provided by Xoserve. Without this link the Panel believe that parties could be put in breach should a Price Comparison Website request information about domestic consumers.

Yours sincerely,

Steve Ladle
iGT UNC Chair