

iGT UNC / iGT INC Consultation Response

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| Date | 18 th January 2012 |
| Reference | iGT044 Modification Proposal Consultation |
| Title | iGT044 Password Protection Protocols for Sensitive Personal Data |
| Respondee | Stephanie.shepherd@npower.com RWE npower Ltd. |
| Position on the Modification | Support Modification Qualified support for Modification Do not support Modification (delete as required) |

Facilitation of the relevant objectives

How this proposal will, if implemented, better facilitate the "code relevant objectives", as defined in Standard Condition 9 of the Gas Transporters Licence. For those answered Yes to, please provide a detailed explanation below the table.

| Relevant Objective | Yes/No |
|--|--------|
| a. the efficient and economic operation of the pipe-line system to which this licence relates | No |
| b. so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters | No |
| c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence | No |
| d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers | No |
| e. so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers | No |
| f. so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition | Yes |
| g. so far as is consistent with sub-paragraphs (a) to (f), the compliance with the Regulation* and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators | No |

* Regulation 2009/715/EC of the European Parliament and of the Council of 13 July 2009

Relevant Objectives to be better facilitated:

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Likely impact on environment?

How this proposal will, if implemented, impact on greenhouse gas emissions?

None

Implementation issues including impact on your systems

None to Pipeline User, see comments below.

Additional Information and Comments

RWE npower support the proposal to introduce password protection protocols to the CNC file to protect the data of Customers with Special needs. However, we seek clarity on a few points:

The background section states that Change of Supplier files are not encrypted but the proposal section makes no reference to COS flows, CNC is the Special Needs update flow. The IPL registration flow SR.T06 contains care/vulnerability information so the proposal needs extending to cover all flow type(s) that hold sensitive data - IPL file CN.T03 also contains care information, can IPL confirm this as a potential impact? If the files stated are subject to this change; a subsequent change to individual network code will be required.

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