

Consultation Response**iGT095VV: Provision of access to Domestic Consumer data for Price Comparison Websites and Third-Party Intermediaries**

Responses invited by: 08 Sept 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

BUUK recognise this is a permission only modification which seeks to allow Price Comparison Websites and Third-Party Intermediaries access to gas domestic data to better facilitate customer switching. We support providing industry data to PCWs providing the solution used is fully compliant with the Data Protection Act.

We acknowledge in order to comply with the CMA Order 2016, Transporters must not prevent the CDSP from providing access to the PCWs and therefore it is pertinent access to the domestic gas data is granted.

BUUK's original consultation response highlighted concerns over Data protection, this was due to not having the auditing controls in place. We are now comfortable the Privacy Impact Assessment and accompanying technical solution document address these concerns.

We note the confidentiality agreements are yet to be amended to reflect the change in solution and to include what auditing and monitoring controls are in place. The CDSP has stated iGTs will gain visibility of this prior to implementation of the service. As such this is our reason for offering qualified support.

We continue to support the API solution developments via the DSC governance arrangements.

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 qualify under the self-governance rules as a subsequent increase in consumers seeking to switch Supplier could have a material impact on parties to the IGT UNC, consumers and competition.

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

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We believe this modification meets objective d) as promotes competition between Gas Suppliers. Consumer switching is expected to increase once core data items are validated early on in switching process. This will result in increased confidence and activity in the energy markets therefore creating a more competitive environment for suppliers.

Impacts and Costs

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

Parties should not incur additional costs for this modification, however it is noted the technical solution costs have not yet been determined. Any associated costs to the development and testing of the solution will fall under the DSC arrangements.

Implementation

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

There are no envisaged system changes in implementing this modification as it is permissions only. The CMA Order came into force in February 2017 and due to therefore we would support implementation as soon as reasonably practicable following the Authority's consent.

Legal Text

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

We are satisfied the legal text delivers the intent of the modification.

Further Comments

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

BUUK recognise there are wider issues on how the API solution will be delivered which will need to be addressed via the appropriate governance sign off procedure.

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