

Consultation Response**iGT095: Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries**

Responses invited by: 08/09/2017

Respondent Details

Name: Tahera Choudhury

Organisation: Xoserve

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

Xoserve support the implementation of this modification, as this modification would create the relevant permissions within Uniform Network Code to enable the release of data to PCWs. This permission is essential to enable Xoserve to comply with the, CMA DES Order 2016.

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?

N/A

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

None

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Positively

Impacts and Costs

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

There are no Xoserve costs associated with this permissions modification

Implementation

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

Xoserve believe implementation should be immediately after an Authority decision has been made, as this would facilitate compliance with the CMA DES Order 2016 as soon as possible.

Legal Text

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

No comment

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

Please find responses to Ofgem's questions below.

Q1) Whether shippers and suppliers are data controllers in this context and the implications of this for data disclosure as well as any mitigating actions that should be taken.

N/A

Q2) How PCWs and TPIs will have their access to data restricted (contractually or otherwise), including for access to non-domestic supply point data which is not permitted by the proposed modifications.

The attached, PWC access to data – Solution description for Modification 0593 – 095 workgroup report, details how PCWs access to data will be restricted inclusive of the restrictions to non-domestic supply point data.

Contractual obligations also set out access conditions for PCWs.

Q3) what provisions are in place to ensure consumer consent will be positive informed consent, and Contractual obligations set out conditions to ensure PCWs have actively obtained consumer consent.

Q4) any implications and mitigating actions that should be taken in the context of the changes to Xoserve's governance and funding arrangements as a result of FGO and the forthcoming implementation of the GDPR

Not specifically for this permissions modification.

However The Modification 0593 – 095 workgroup report provides details on GDPR compliance in reference to the technical solution.

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