

**Consultation Response****iGT106:** Provision of access to Domestic Consumer data for Suppliers

Responses invited by: 07/02/2018

**Respondent Details**

Name: John Cooper

Organisation: BUUK

Support Implementation ☒Qualified Support ☐Neutral ☐Do Not Support ☐

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

BUUK are in support of the proposed modification for the following reason(s):

- Provides fair and equal competition across the supply industry
- Aligns the IGT UNC and UNC

## 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?**

BUUK agree that this is should be a self-governance modification.

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

Whilst BUUK agree with the data protection principles and agreements outlined in the forthcoming service build, we do have concerns surrounding active monitoring of Suppliers and their use of the data. The CDSP will have the powers to audit Suppliers without notice, BUUK would be keen to know that as part of the solution would there be any form of active monitoring of the use of this data, or will it be solely up to industry parties to report suspicious use of data? Whilst the prior point is for consideration, to strengthen data protection compliance, BUUK would advocate that CDSP carries out audits on Suppliers periodically, again without notice, at least to ensure that all participating Suppliers are acting within the agreed principles and agreements.

Our understanding is, following approval of this modification, suppliers will be able to access the data via the Dual Fuel API service, originally introduced as part of IGT095/0596 to provide PCWs with access. We would therefore expect the appropriate confidentiality agreements to be in place prior to granting access.

## Relevant Objectives

**How would implementation of this modification impact the relevant objectives?**

BUUK would support that implementing the proposed solution and service build within the IGT UNC would help to provide equal and positive competition across the industry therefore fulfilling objective d.

## Impacts and Costs

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

BUUK see that no costs should be passed on to consumers and that this is an inherently supplier/shipper driven change, so do not envisage picking up any associated costs.

## Implementation

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

BUUK would ideally like to see this being implemented in line with the UNC modification (0640S), in doing so, helping to ensure that the two codes are aligned.

## Legal Text

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

We believe the legal text delivers the intent of the modification.

## Further Comments

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

We acknowledge the data items in the solution were originally intended to replicate those detailed in IGT095/0596 however, upon review we recognise they are not an identical match, this discrepancy was highlighted to the proposer. It was confirmed the Meter Mechanism Code contains the same information as the Smart Meter Technical code and therefore would duplicate data. It appears when the solution changed the final version of IGT095 was not updated. From a technical perspective this is not an issue.

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**