

## iGT UNC Modification Panel Meeting

Thursday 23<sup>rd</sup> February 2017

Gemserv, 8 Fenchurch Place, London EC3M 4AJ

Attendee	Organisation	Representing	As
Steve Ladle (SL)	Gemserv	Code Administrator	Chairman
Andrew Margan (AM)*	British Gas	Pipeline Users	
Kirsty Dudley (KD)*	E.ON UK	Pipeline Users	
Kristian Pilling (KP)*	SSE Energy Supply	Pipeline Users	Up to item 3
Kish Nundloll (KN)*	ESPUG	Pipeline Operators	
Andrew Wallace (AW)*	Ofgem	Authority	
Rachel Bird (RB)	Gemserv	Code Administrator	Secretariat

*\*Attended via teleconference*

### 1. Alternates, observers and apologies

SL welcomed attendees to the Modification Panel meeting of the iGT UNC. Apologies for absence were received from Jenny Rawlinson (BU-UK) and Cher Harris (Indigo Pipelines). KN was nominated Alternate for both absent Pipeline Operators. SL thanked the Panel for their co-operation in attending this short notice meeting in order to consider the Workgroup Report for iGT095.

### 2. Confirmation of Agenda

SL asked the Panel if they had any additional items to add to the agenda for this meeting. The Panel had no additional items.

### 3. Workgroup Reports

#### iGT095 - Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries

SL introduced the Modification to the Panel, explaining that this Modification was a 'Permission' Modification which allows PCWs and TPIs access to DES. This may avoid some erroneous switches. The Chair noted that this Modification's Consultation period closed on 22<sup>nd</sup> February 2017 and six responses were received.

The Chair opened up discussions to the Panel on whether there were any comments regarding the Pre-Panel FMR for iGT095.

The Panel members believed the aim of the modification was clear in terms of it allowing access to certain information from the DES system for PCW/TPIs subject to the PCW/TPI signing a confidentiality agreement with the GTs and the iGTs.

AM noted that there was concern that the current design of the DES system could not limit access to purely domestic data and that the system could not track details of the data that was accessed. AM continued that as such it was felt to be possible for PCWs/TPIs to access data for which they did not have the consent of the consumer which in turn could create Data Protection issues for both Transporters and Suppliers/Shippers.

AW sought to receive clarity on the reasons for lack of support for the Modification citing a view that this was an 'enabling Modification'. AW asked why the iGTs did not support the modification on the basis that no PCW/TPI would be granted access until the Confidentiality agreement had been signed by each and every GT/iGT.

KN expressed that their concern is that until more was known about the full implications of the DES design for Data Protection responsibilities for all parties, and before a Privacy Impact Assessment had been completed, then implementation of the Proposal even as an enabling modification should not be considered. KN continued that there were still fundamental concerns that had not been satisfactorily answered.

KN similarly raised concerns over the solution offered by this Modification and noted that the urgent timetable assigned to this Modification meant that there were still questions to be asked around the Confidentiality agreement and privacy issues with the DES system, which under the standard modification process may have been able to be discussed during the workgroup process.

The Panel noted that they were reluctant to rush through the process when the relevant checks and balances were not in place to reduce the risk of Data Protection breaches and the potential impact on all iGT UNC parties was still not fully clear.

The Panel were asked to vote on iGT095, KP had already left the meeting but had appointed AM as an alternate and given AM an indication of his vote. All votes cast (Five in total) did not support this Modification. KN noted that CH did not give him direction on her vote and therefore abstained on CH's Vote.

The Panel agreed that, should the Authority direct implementation, then the Modification should be implemented as soon as possible but should also be in line with the UNC implementation timing.

**Action: EXP2302\_01: Code Administrator to send the Post Panel FMR to the Authority for a decision on Implementation with a Panel recommendation not to implement this Modification.**

#### **4. Any Other Business**

None

**The next Modification Panel meeting will be convened on 15<sup>th</sup> March 2017.**

## Summary of Actions

Action Reference	Date	Action	Owner	Status
EXP2302_01	23 <sup>rd</sup> February 2017	Code Administrator to send the Post Panel FMR to the Authority for a decision on Implementation with a Panel recommendation not to implement this Modification.	Code Administrator	New

DRAFT