

Consultation Response

IGT111: Updating of the IGT UNC data permissions

Responses invited by: 08 AUG 2018

Respondent Details

Name: Radhika Kalra

Organisation: E.ON

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We support this modification because it is good governance in seeking to ensure that the drafting cross code is aligned between the IGT UNC and the UNC and makes it clear what data can be shared between parties via the CDSP.

Considering that the data permission provisions already exist in the UNC we believe that the differences outlined in the IGT UNC should be brought in line with the UNC as the reporting already exists and so no new reporting would be required.

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?

Yes, we agree that this is a self-governance modification because the changes are seeking to add clarity to the IGT UNC; there are no material changes and Authority approval will not be required.

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

There are no new or additional issues that we believe need to be considered.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

The implementation of this modification enhances relevant objective F in improving efficiencies in the administration of the code by adding clarity in what data can be shared between parties via the CDSP.

Impacts and Costs

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

We do not believe that there should be any development or ongoing costs associated with this modification as the amendments are not material and the data permissions are being aligned to those already in place in the UNC.

Implementation

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

We believe this modification should be implemented in November 2018 as there are no system changes required and is only amending the wording of the provisions in the IGT UNC in line with the provisions in the UNC

Legal Text

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

We are satisfied that the amendments to the legal text are relevant and will deliver the intent of the modification.

Further Comments

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

We have no further comments.

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