

Consultation Response

IGT111: Updating of the IGT UNC data permissions

Responses invited by: 08/08/2018

Respondent Details

Name: Rob Johnson

Organisation: ES Pipelines

Support Implementation

**Please briefly summarise the key reason for your support**

ES Pipelines Agrees with the proposer of this modification, that Section K of the IGT UNC should be amended in line with the provisions set out under the UNC. This will ensure that it is clear what data can be shared with the CDSP by IGT UNC Parties.

A central characteristic of competition is the exchange and flow of information. In this case the objective is to create a neutral platform for competition to occur. Clarifying UNC data permissions can only benefit smooth data flows between industry parties. This in turn will benefit consumers that will not experience any potential and consequential problems that occur due to poor or no clarity regarding permissions.

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.

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

We think this proposal is consistent with the general political and climate regarding information after the introduction of the GDPR. In particular this observation relates to the general importance of trust that is connected to the fair processing and transfer of information.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

ES Pipelines agrees with the proposer that administration of the code would be improved by the addition of clarity with regards to what data can be shared with the CDSP by IGT UNC Parties.

We would suggest that the modification helps not only objective F (efficiency) but possibly also C (discharge of obligations). It would follow if the arrangements are more efficient there would also be a case for D (competition between industry parties).

Impacts and Costs

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

No up-front or ongoing costs are anticipated with implementation of this modification

Implementation

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

ES Pipelines agrees that implementation in the November release is acceptable.

Legal Text

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

Yes

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