

## Consultation Response

# IGT115: Update to IGT UNC to formalise the Data Permissions Matrix

Responses invited by: 10/10/2018

### Respondent Details

Name: Rob Johnson

Organisation: ES Pipelines Ltd

Support Implementation ☐

Qualified Support ☒

Neutral ☐

Do Not Support ☐

## **Please briefly summarise the key reasons for your support**

ES Pipelines supports the notion of improving efficiency in the change process for the IGT UNC and is in general in support of this proposal. We do have some concerns regarding the appropriateness of the solution as we believe that all due care and diligence should be taken with any decision to alter data permissions.

ES Pipelines recommends that in the process to alter data permissions that Contract Management Committee must also consult with the Change Management Committee before making a decision. Our rationale for this is because it is within the Change Management Committee's remit to deliberate on change /new service requests and also to provide the basis on which a change or modification may be proposed.

We would also suggest that the Contract Management Committee have the ability to pass a decision to alter data permissions over to the IGT UNC, (meaning that a modification would have to be raised) if they are unable to make a decision for any reason.

## 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?**

ESP does not believe that this modification is suitable for self-governance. The decision to alter data permissions via the API to businesses such as Suppliers or Price Comparison Websites could have an effect on the choice available in the market place and therefore competition. If such a decision is made imprudently, these effects could be negative. As such we believe that an authority decision may be required.

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

As detailed above, if this modification is implemented, we believe that a decision to alter data permissions should be made by the Contract Management Committee only after a recommendation has been sought from the Change Management Committee.

We also are of the opinion that an option should be open so that the Contract Management Committee may refer the decision to alter data permissions to the UNC & IGT UNC should the Contract Management committee not be able to reach a decision for any reason.

## Relevant Objectives

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

We agree with the proposer that this Modification will have a positive impact on relevant objectives D) Securing of effective competition and F) Promotion of efficiency in the implementation and administration of the Code.

## Impacts and Costs

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

No costs are anticipated with this change.

## Implementation

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

We believe that this modification can be implemented as soon as practical following a decision to do so.

## **Legal Text**

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

We recommend some changes to the legal text:

24.6.1 – the word “precedent”, on the last line, should be replaced with “precedence”.

Section M: given the argument, within the draft modification document, that the objective “(F) Promotion of efficiency in the implementation and administration of the Code”, it would seem prudent to improve the efficiency by including the definition of “Data Permission Matrix” within both the IGT-UNC and the UNC – particularly as this is a definition and not a structural or operational impact – and saving people the time of having to locate the definition in another document.

## **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](mailto:IGTUNC@gemserv.com)**