

Consultation Response

IGT0118: Amendments to the IGT UNC Password Protection Protocols

Responses invited by: 20 MAR 2019

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 / opposition

We believe this change is required to bring the Password Protection Protocols up to date in line with advancements in technology.

We believe the introduction of a baseline password encryption standard is beneficial to the industry in offering a higher level of protection as it will prevent Pipeline Users using the same password for a prolonged period of time.

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?

We agree with the Panel's determination

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

We don't believe any additional issues need to be considered here but it was evident from the discussions at the Workgroup on this mod that there are wider issues to be considered which we are raising a Review Group to discuss there.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We support the relevant objectives proposed and the reasons provided as having a positive impact.

Impacts and Costs

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

We anticipate low to no implementation costs as this process is already in place, this change is just making it more robust. Enduring costs would still be low for FTE to allocate the passwords. We do not anticipate anything material for implementation or enduring.

Implementation

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

3 months should be sufficient to meet the June release for implementation due to no system impacts being envisaged and

Legal Text

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

We are satisfied with the amended legal text and believe it will deliver the intent of the modification.

Further Comments

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

No comments

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