

## Representation

### Draft Modification Report

#### 0314 - The provision of a "Data Update" to Non Code Parties

**Consultation close out date:** 25 February 2011

**Organisation:** Scottish and Southern Energy

**Representative:** Martin Brandt

**Date of Representation:** 25 February 2011

#### Do you support or oppose implementation?

Not in Support

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

The named body has no industry governance over them. The confidentiality requirement will be between transporters and the 3rd party and it is unlikely that the transporters will be an injured party if confidentiality is breached. This may act as a disincentive to taking action under the agreement, which consequentiality dilutes the strength of the requirement on the third party, if they perceive there is a very small possibility of action being taken. It also sets precedence on passing data to 3rd parties and we are very uncomfortable about this. Suppliers and Shippers need to see that the data model and security issues are robust before enabling data transfers to 3rd parties. This is not the current situation. We would like to see one solution for AMR and Smart, to provide a better service to the customer and ensure there are no delays to transferring a customer due to confusion over the body to be dealt with. The durability of the solution is questionable and it feels like a 'quick fix'. This solution feels inefficient, it is unclear if it is sustainable into the future and it has excluded iGT's. SSE believes the industry would be better served by populating SCOGES with the additional AMR data as SCOGES is an existing place which provides a view in respect of the whole gas market and has appropriate governance obligations in place. It is likely that SMART meters will be used in the I & C SSP sector so there will be confusion over the body to deal with for the I & C market. Experience also suggests that when you have multiple databases with common data, it is very difficult, if not impossible, to ensure that the data is kept aligned.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

#### Relevant Objectives:

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

It does not better facilitate the achievement of the relevant objectives

0314

Representation

25 February 2011

Version 1.0

Page 1 of 2

© 2011 all rights reserved

**Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

n/a

**Implementation:**

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

n/a

**Legal Text:**

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

*No. for the reasons outlined above in respect of the confidentiality agreement.*

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

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*