

## Representation

### Draft Modification Report

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

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

**Organisation:** E.ON UK

**Representative:** Brian Durber

**Date of Representation:** 25 February 2011

#### **Do you support or oppose implementation?**

Comments only.

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

We welcome initiatives that support AMR interoperability, however we understand that not all AMR service providers support the ESTA data hub and therefore we are not sure how such a hub could provide a universal solution. From a shipper/supplier perspective there are a number of ways that we could comply with licence requirements to ensure that AMR was installed and we would wish to do this in the most cost effective manner. Notwithstanding we would not wish to restrict certain parties having access to data that enabled their solution, subject to rigorous protections being in place such that any party would have to satisfy industry of their legitimate need and that such a request must be validated by the UNC change process. The Proposal does not indicate how the hub would be funded and so we presume that ESTA Ltd. will ultimately contract directly with the transporters for the specific data items that they require. UNC 0314 does not of itself create a data hub but merely acts as facilitator and so we have no particular grounds to oppose although for the reasons given above we cannot lend our positive support.

Therefore we provide our views as comments only.

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

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**Relevant Objectives:**

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

**Impacts and Costs:**

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

**Implementation:**

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

**Legal Text:**

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

*NB: while formal legal text has not been provided, the Transporters have indicated that draft text will be published alongside this Report during the consultation period. Comments on this will be helpful when the text is finalised.*

**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.*