

## Representation - Draft Modification Report 0593

### Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries

Responses invited by: **5pm on 09 February 2017**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Shanna Key
<b>Organisation:</b>	Northern Gas Networks
<b>Date of Representation:</b>	07/02/2017
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

NGN supports this modification, and the goal of making switching easier for consumers, and feels that the reasonable access conditions specified in the modification regarding the confidentiality and commercial agreements should provide adequate safeguards and a legal framework to protect consumer data from misuse.

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

NGN does not foresee lengthy lead-time being required for the implementation because DES is already an active service provided by Xoserve; therefore, the PCW/TPIs only need to sign the appropriate agreements in order to be provided with a DES login ID.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

There should be minimal costs and no development required in order for Xoserve to provide access to DES for PCW/TPIs, as it is an existing service.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes, we believe the legal text supports the solution outlined in the modification.

**Modification Panel Members have requested that the following questions are addressed:** *Remove Section if no questions*

*Q1: To inform Panel's consideration of self-governance, views are requested as to whether respondents believe that releasing these data items represents a material impact on competition between, or commercial arrangements for, Shippers or Transporters. Please provide evidence to support your response.*

The intention of the CMA Order is to further competition by making the switching process easier for consumers. This means that there will be a material impact on code parties upon implementation of this modification, and so should not be considered self-governance.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

None.

**Please provide below any additional analysis or information to support your representation**

None.