

Representation

Draft Modification Report

Modification Report UNC 0593: Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries

1. **Consultation close out date:** 9th February 2017
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:**
Gazprom Energy
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1 Tony Wilson Place
First Street
Manchester
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4. **Representative:**
Steve Mulinganie
Regulation Manager
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0799 097 2568
5. **Date of Representation:** 7th February 2017
6. **Do you support or oppose Implementation:**
We **Do Not Support** implementation of Modification 0593
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
Whilst we are not a Domestic market participant we are aware, through Xoserve meetings that the proposed Xoserve solution will provide unfettered access to all industry data (including non-domestic information). We do not believe that adequate controls and safeguards are being put in place to ensure data is kept secure and is used appropriately. Having due regard for these concerns we do not believe it is appropriate to support this proposal knowing that the proposed solution is not fit for purpose.
8. **Are there any new or additional Issues for the Modification Report:**
No
9. **Self-Governance Statement Do you agree with the status?**
NA

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We **agree** with the proposer that this modification is positive in respect of Relevant Objective **D**

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We **have not** identified any significant costs associated with this modification

12. Implementation:

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

We believe permission should only be granted once a robust solution has been put forward.

13. Legal Text:

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

We have no comments on the Legal Text provided.

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

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

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.

We believe the solution is not fit for purpose and therefore has the potential to lead to material consumer detriment and to adversely affect wider confidence in the market. Accordingly we believe any decision on implementation should ultimately lie with Ofgem.