

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

Representative:	Dan French
Organisation:	npower
Date of Representation:	08/02/2017
Support or oppose implementation?	Support * <i>delete as appropriate</i>
Relevant Objective:	d) Positive * <i>delete as appropriate</i>

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

We support the change as this will facilitate consumer engagement and improve the switching process. This will reduce actual and perceived barriers to switching resulting from erroneous transfers and failed switches.

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

None

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

None

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

Yes we believe that the legal text will deliver the intent of the solution.

Modification Panel Members have requested that the following questions are addressed:

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.

This change will ensure a better journey for consumers, improving the switching process and will facilitate ongoing consumer engagement. In turn this will stimulate competition amongst market participants.

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.*

No

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

We support the proposed controls set out in the draft modification report to protect customer data that PCWs have access to in the same way that suppliers are (i.e. to use the data only for particular restricted purposes). Also the need for PCWs to be assessed to ensure that they have appropriate organisational and technological processes and procedures in place to keep the data secure.