# UNC Workgroup 0593 / iGT095 Minutes Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries

### Tuesday 04 July 2017

# at Gemserv, 8 Fenchurch Place, London EC3M 4AJ Elexon 350 Euston Road, London NW1 3AW

#### **Attendees**

| Adam Pearce                | (AP) | ESP                   |
|----------------------------|------|-----------------------|
| Andrew Margan*             | (AM) | British Gas           |
| Bob Fletcher (Chair)       | (BF) | Joint Office          |
| Chris Barker               | (CB) | BUUK Infrastructure   |
| Claire Towler              | (CT) | SSE                   |
| Colette Baldwin            | (CB) | E.ON Energy           |
| David Mitchell*            | (DM) | Scotia Gas Networks   |
| John Welch*                | (JW) | npower                |
| Karen Visgarda (Secretary) | (KV) | Joint Office          |
| Nicky Rozier               | (NR) | BUUK Infrastructure   |
| Paul Orsler                | (PO) | Xoserve               |
| Rachel Bird                | (RB) | Gemserv               |
| Shanna Key                 | (SK) | Northern Gas Networks |
| Steve Ladle                | (SL) | Gemserv               |
| Tahera Choudhury           | (TC) | Xoserve               |
| Victoria Parker            | (VP) | ESP                   |

<sup>\*</sup> via teleconference

Copies of all UNC meeting papers are available at: http://www.gasgovernance.co.uk/0593/040717

The UNC Workgroup Report is due to be presented at the UNC Modification Panel by 20 July 2017.

#### 1.0 Introduction to Joint Governance Workgroup Meeting and Review of Minutes

BF and SL welcomed all to 0593/iGT095 Workgroup meeting.

SL explained the content of the agenda and he said discussion would take place regarding the Privacy Impact Assessment (PIA) and the Data Protection Principles and that there were still some un-resolved questions that needed answering.

BF also said there was a concern regarding answering the Ofgem questions including impacts following the implementation of FGO, permissions through the UNC and DSC and the Impact Assessment in regards to the Change Orders for the development work that Xoserve and Gemserv might be undertaking jointly. TC said that a line would be drawn between the UNC and the DSC processes, however, that the PIA would sit over both areas, as this been requested by Ofgem and was referenced to in the send-back letter.

#### Review of Minutes (22 June 2017)

The minutes of the previous meeting were approved.

#### 2.0 Consider and review the draft Variation Requests

SK provided an overview of amendments and changes that had been discussed and requested in relation to the Solution during the previous Workgroup meeting held on 22 June 2017. SK then moved through the document and drew attention to specific areas or alterations

and she confirmed the references to TPI's had now been removed as this was included in the definition of a PCW, and the that Legal Text had now also been updated with the correct terms for the Data items. NR stated that the iGT095 and UNC 0593 Modifications were a mirror image of each other.

AP asked what would be the situation if Xoserve did not produce the required reports as per Section J) and how would the Transporters ensure this was undertaken, as is defined in the CMA Order. TC explained that Xoserve have an obligation to produce the report, as this was a requirement from the Order and they need to Comply with the Statement, so it would be provided as requested.

A lengthy general discussion then ensued regarding the overall process of the reports being generated and the importance of these and the fact this was seen as a direct service requirement for the CDSP. BF said that if needed, the escalation process would be used and that this would be addressed in isolation through the DSC governance process and TC said that for assurance purposes that this matter could be referenced within the modification itself. The Workgroup were in agreement with this suggestion.

#### 3.0 Review the new draft Privacy Impact Assessment (PIA)

TC provided an overview of the Risk Table within the PIA solution, and drew attention to specific concerns and views that had been raised by Industry Parties. These comments were briefly discussed and TC said PIA would continue to evolve and capture comments from the Industry and she confirmed the PIA would be updated in readiness for both the next DSC Change Management Committee and Contract Management Committee meetings.

It was proposed that the PIA should also be included as an appendix within the Modification Reports to be considered alongside the consultation, to provide further clarify and seek wider industry views.

#### 4.0 Develop/complete the Final Modification Report – Workgroup Supplemental Report

SL then moved through the iGT095 Workgroup Report and high-lighted any specific areas of change or minor amendments and where required, these would be reflected in the UNC 0593 Final Modification Report (FMR).

AMa proposed that reference should be made within the Impact Assessment section in relation to the original proposal and that it was not compliant with Data Protection requirements and that the overall solution and Technical solution were still not known or clearly identified. BF said these should be included in the Supplementary Report and should also include with the questions that were posed by Ofgem, in readiness for the modifications to be submitted for further consultation. TC added that Xoserve were still presently working on a robust solution, from both a process and technical perspective and that this would be shared shortly at the DSC Committees mentioned above.

A lengthy general discussion then took place as to who would be the 'Data Controllers' and it was proposed the Shippers and Suppliers were definitely not the Data Controllers in the provision of this data to PCWs, due to not having any control of how or when the data was accessed plus they were not in a direct contractual relationship with the PCW. A number of participants disagreed with Xoserve view that they were not the data controller, as the contractual relationship and management of access was within the CDSPs gift. Further discussion ensued regarding the potential risks and it was agreed this area should be debated at the DSC Committees.

TC said that within the modification a reference was also needed in relation to the 'Interim Telephone Service' that would need to be operational until the Application Programming Interface (API) was fully developed and operational, as this had been confirmed within the CMA Order and that Xoserve would need to adhere to this.

All were in agreement that this was an Authority Decision Modification and the Workgroup were all in agreement that this should be presented to the July Panel.

#### 5.0 Review of Outstanding Actions

**Action 0601:** Ofgem (JD) to provide a view on whether the meter mechanism code should be included in the data items provided.

**Update:** BF said he would contact JD to gain clarification on this matter and all agreed the action could now be closed. BF said he would contact JD at Ofgem to gain further clarity regarding this specific action to ascertain if the meter mechanism code was to be included. **Carried forward.** 

**Post Meeting update:** Ofgem (JD) confirmed that Ofgem were happy for the action to be closed on the assumption that meter mechanism will be included, but that it will be subject to the PIA alongside all the other data items. This action is now closed. **Closed.** 

**Action 0602:** Northern Gas Networks (SK) to amend the draft Variation and the implementation section, together with re-assessing the Legal Text to align with the amended solution.

**Update:** SK said this action could now be closed, as the amendment had now been completed. **Closed** 

**Action 0603**: Xoserve (TC) to update the Risks Table within the PIA document and to add in any other Risks as raised via the DSC Change Management Committee consultation process.

**Update:** TC said this action could now be closed as the Risks Table had now been updated and circulated. **Closed** 

#### 6.0 AOB

None.

#### 7.0 Next Steps - timetable

BF confirmed no further meetings were planned as the modification would be presented at the July Panel.

#### Action Table (04 July 2017)

| Action<br>Ref | Meeting<br>Date | Minute<br>Ref | Action  | Owner                               | Status<br>Update |
|---------------|-----------------|---------------|---|-------------------------------------|------------------|
| 0601          | 22/06/17        | 2.0           | Ofgem (JD) to provide a view on whether the meter mechanism code should be included in the data items provided.   | Ofgem<br>(JD)                       | Closed           |
| 0602          | 22/06/17        | 2.0           | Northern Gas Networks (SK) to<br>amend the draft Variation and the<br>implementation section, together<br>with re-assessing the Legal Text to<br>align with the amended solution. | Northern<br>Gas<br>Networks<br>(SK) | Closed           |

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|---------------|-----------------|---------------|--|-----------------|------------------|
| 0603          | 22/06/17        | 3.0           | Xoserve (TC) to update the Risks Table within the PIA document and to add in any other Risks as raised via the DSC Change Management Committee consultation process. | Xoserve<br>(TC) | Closed           |