

Representation - Draft Modification Report UNC 0668S

Amendment of the Data Permission Matrix to add Alt Han Company as a new User type

Responses invited by: **5pm on 10 January 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Edward Ewan Fyfe
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	8 th January 2018
Support or oppose implementation?	Qualified Support
Relevant Objective:	f) Positive

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

SGN offers its Qualified Support for this modification. We agree with the overall objective of this modification, and positively support any steps to help ensure all homes regardless of type and location can have the choice of a Smart Meter. However, SGN are keen to develop a better understanding as to how the proposed data access and the actual Alternative Home Network technology will work in practice.

This modification will add Alt HAN Co as a new User type to the Data Permission Matrix, which will in turn enable a request for the disclosure of specific data items to be submitted to the DSC Contract Management Committee for approval. SGN feel that every effort should be made to share only the information for the actual properties that can benefit from the Alt Han technology, and sharing the data for all supply points is very much against GDPR data minimisation guidelines.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree with the Self-Governance Statement within the modification.

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

As soon as possible. As there is a related IGT UNC Modification (IGT116), the implementation of the IGT UNC and UNC mods should be aligned.

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

No SGN costs or system development identified.

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

Yes. SGN are satisfied the legal text will deliver the intent of the solution.

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

None identified.