

Representation - Draft Modification Report 0593V

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

Responses invited by: **5pm on 08 September 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Nicky Rozier
Organisation:	BUUK
Date of Representation:	08.09.2017
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Positive

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

BUUK recognise this is a permission only modification which seeks to allow Price Comparison Websites and Third-Party Intermediaries access to gas domestic data to better facilitate customer switching. We support providing industry data to PCWs providing the solution used is fully compliant with the Data Protection Act.

We acknowledge in order to comply with the CMA Order 2016, Transporters must not prevent the CDSP from providing access to the PCWs and therefore it is pertinent access to the domestic gas data is granted.

Main concerns around Data Protection have been highlighted throughout discussions, this was due to not having the appropriate auditing controls in place. We are now comfortable the Privacy Impact Assessment and accompanying technical solution document have been developed sufficiently and addressed these concerns.

We note the confidentiality agreements are yet to be amended to reflect the change in solution and to include what auditing and monitoring controls are in place. The CDSP have stated Transporters will gain visibility of this prior to implementation of the service. For this reason, BUUK can only offer qualified support.

We continue to support the API solution developments via the DSC governance arrangements.

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

We believe this modification should be implemented as soon as is reasonably practical following Authority decision.

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

There are no anticipated costs associated with the implementation of this modification, however it is noted the CDSP will incur costs in developing a robust solution and providing access to the PCWs. Any associated costs to the development and testing of the solution will fall under the DSC arrangements.

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

Yes, we are satisfied the legal text delivers the intent of the modification.

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

Q1: To inform Panel's consideration of the varied modification, views are requested as to whether you agree that Ofgem's sendback questions have been addressed in the revised modification.

We believe the questions set out in the Authority's send back letter have sufficiently been addressed via the Privacy Impact Assessment and workgroup supplemental report.

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 identified

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

BUUK recognise there are wider issues on how the API solution will be delivered which will need to be addressed via the appropriate governance sign off procedure.