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8<sup>th</sup> December 2008  
Your Reference: 0238

**Re: UNC Modification Proposal 0238 Amendment to Protected Information Provisions to facilitate DNO compliance with SPAA Schedule 23**

Dear John,

Thank you for your invitation seeking representations with respect to the above UNC (Uniform Network Code) Modification Proposal. As Proposer, National Grid Distribution (NGD) is supportive of its implementation.

As we have described within the Modification Proposal, NGD is concerned that a Supplier or other person does not fall under the recipient category as contained within SSC A31; currently the UNC does not specify such appropriate persons. Hence we believe the protection afforded by the combination of UNC and SSC A31 is unclear.

Therefore, NGD's view is that the inclusion of specific terms within the UNC would be helpful to deliver the intent of the Supply Point Administration (SPAA) Schedule 23. Modification Proposal 0238 proposes for clarification purposes that an exception be added to the Protected Information provisions within Principal Document Section V5.5. This would facilitate the disclosure by DNOs of Protected Information for change of Supplier purposes to Suppliers and to other persons. This is consistent with applications made in accordance with the principles contained in the 'Other Users Access' provisions of SPAA Schedule 23.

Our view is that introducing Suppliers and other persons as a class of person permitted under UNC to receive Protected Information as described above would provide absolute clarity regarding disclosure under SSC A31, would meet the requirements of Section 105 of the Utilities Act and fulfil the aspirations of Schedule 23 of SPAA to permit access to data for Suppliers and other persons.

Implementation would therefore facilitate SSC A11.1(c): "so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence".

Data service provision is via the Transporters' agent's Internet Access to Data (IAD) platform. We note that It is necessary to partition IAD by Supplier to ensure the Supplier is only able to view data pertinent to itself/its customers. This would be essential to avoid a Supplier viewing the information of another Supplier which utilises the same Shipper. Consequently, we would like to advise that a minimum 6 month lead time would be required to facilitate implementation of this Modification Proposal.

If you require any further information in respect of this representation please contact Chris Warner on 01926 653541 or email [chris.warner@uk.ngrid.com](mailto:chris.warner@uk.ngrid.com).

Yours sincerely

Richard Court  
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