

Representation - Draft Modification Report 0574
Creating the permission to release supply point data to the Theft Risk Assessment Service (TRAS)

Responses invited by: 5pm on 09 September 2016

To: enquiries@gasgovernance.co.uk

Representative:	Colette Baldwin
Organisation:	E.ON Energy Solutions
Date of Representation:	9 th September 2016
Support or oppose implementation?	Support
Relevant Objective:	d)(ii) Neutral

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

The TRAS provider has determined that the addition of the requested data will enrich the data received from suppliers and give them confidence that they are in receipt of all appropriate data from suppliers, and they believe this will ensure that all created live meter points are captured within the TRAS system.

I believe this modification to be neutral in terms of the effect on competition. The difference between the permission to release data to commercial and contestable third party service providers (as under UNC 0422 approved by Ofgem in March 2013) was justified to support the competitive market (by ensuring metering costs are being appropriately targeted). This modification however facilitates data provision to a monopoly service provider which is delivering a service that suppliers are obligated via their licence conditions to implement. The Gas Transporters, as custodians of the centrally held data requested, are the only parties who can provide the full data set and therefore Relevant Objective F is more relevant, as it confers the appropriate permission within the code to allow the data to be provided from the only available and accurate source.

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

I believe this modification is suitable for self-governance as it meets the criteria since it will not have a material impact on the parties to the UNC. The costs of the provision of the data will be fully met by the service requester, and the data is standing industry data items that are already combined in the M No DVD Service and therefore the construction of the specific data requested isn't unnecessarily complex.

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

As a permissions mod, the implementation timescales are immediately following the completion of the approval of the modification processes, and delivery of the service will be agreed between the parties.

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

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 commercial arrangements for either / both Shippers and Transporters.

This is a permissions modification, and such equivalent permissions modifications have been treated as self-governance by the Panel in the past, the most recent of those being UNC0593.

As the data being requested isn't commercially sensitive and releasing the requested data to the TRAS assists SPAA parties in achieving compliance with their TRAS licence obligations, it could be argued that the conditions for "other users' access" as set out in Schedule 23 of the SPAA (which is mandatory on Transporters and Suppliers) envisages such future arrangements, therefore the impact would not be considered material.

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

n/a