

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:	Dan French
Organisation:	npower
Date of Representation:	09/09/2016
Support or oppose implementation?	Support
Relevant Objective:	d)(ii) Positive

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

We support this change as it will ensure help industry efforts to ensure that detection of theft increases and that the costs associated with theft will reduce for consumers and industry parties, as theft volume is accounted for within industry unallocated energy processes. Another significant factor will be the reduction of the number of theft instances within the industry that will in turn reduce the overall safety risk to consumers.

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

We are happy that it falls within the self-governance criteria, however we acknowledge that data protection is a key concern and we do not have any objection to the status of the modification being changed.

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

We would like to see this change implemented as soon as possible to allow the TRAS Provider to continue to improve the data provided to the Industry that will enable the increase of theft detection.

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 we believe that the legal text will deliver the intent of the solution.

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.

Again we are happy that it falls within the self-governance criteria and therefore does not represent a material impact.

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

To mitigate any concerns about data protection, we suggest that a confidentiality agreement be put in place with the TRAS provider before the data is released to them. We understand that when similar arrangements for data release were put in place in the electricity market, such an agreement was put in place.