

iGT UNC / iGT INC Final Modification Report

Date	25/04/2012
Reference	iGT044
Title	Password Protection Protocols for Sensitive Personal Data
Proposer	E.ON, Colette Baldwin
iGT UNC / Pipeline Operator <i>Confirm whether the Modification Proposal is to the iGT UNC or an iGT's Individual Network Code.</i>	iGT UNC
Modification Proposal Dates	<i>Circulation: 23/12/2011 Response: 18/01/2012 Circulation of DMR: 08/02/2012 Response to DMR: 29/02/2012 DFMR published: 21/03/2012 DFMR considered at Panel: 18/04/2012 FMR sent to authority: 25/04/2012 Circulate Authority's determination: 01/06/2012 Suggested Implementation date: 22/02/2013</i>
Background The DPA 1998 Part 1 of Schedule 1 requires companies to deploy "appropriate technical and organisational measure" to protect personal data. Changes of Supplier files are not encrypted and the file that transfers information relating to vulnerability is sent via email.	
The Proposal The proposal seeks to <ol style="list-style-type: none"> 1. Stipulate the application of password protection requirements into Section K, Clause 23.2 "Protected Information" in relation to Customers with Special Needs (CNC) File from Shipper to GT. 2. Include additional requirements within the Ancillary Document to which Password Protection Protocols will apply. 	
Proposers Suggested timescale for implementation Within 5 days of authority consent as this is a Data Protection Issue and it has been agreed that this information will be exchanged by email.	
How will the proposal operate? The Ancillary Document "Password Protection Protocol" will apply to the transmission of Customer with Special Needs Files when sent from the Shipper to the GT.	
Section of the Code Concerned Section K, Clause 23.2	

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Responses to Modification Proposal and Draft Modification Report

5 responses were received to the Modification Proposal and 3 responses to the Draft Modification Report Consultation. All responses can be viewed [here](#).

Respondee	Response to iGT044	Response to iGT044 DMR
Scottish Power Energy Management Limited	Support	
E.ON Energy	Support	
GTC	Support	
SSE Pipelines	Qualified Support	Qualified Support
Npower	Support	Support
EDF Energy		Support

Facilitation of the relevant objectives

How this proposal will, if implemented, better facilitate the “code relevant objectives”, as defined in Standard Condition 9 of the Gas Transporters Licence.

Summary of Responses to the Modification Proposal

Relevant Objective	Relevant	Not Relevant
a. the efficient and economic operation of the pipe-line system to which this licence relates		6 parties
b. so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters		6 parties
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	1 party	5 parties
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers		6 parties
e. so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers		6 parties
f. so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition	3 parties	3 parties
g. so far as is consistent with sub-paragraphs (a) to (f), the compliance with the Regulation* and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators	1 party	5 parties

Any additional comments:

See individual responses at the link above.

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Proposers View

This proposal will better facilitate the following relevant objective:

The promotion of efficiency in the implementation and administration of the network code and / or the uniform network code by creating a process that reduces Pipeline Users risk of breach of the DPA in the event of sensitive information relating to customer vulnerability being received by transferred in an insecure manner.

iGT UNC Party Response Summary

All parties were generally supportive of the proposal. One party believed that whilst it was an improvement on the current security standards it still did not go far enough.

In terms of implementation, most believed it to be a change to manual processes only and could thus be implemented very quickly (between 5 days and 1 month). One party believed it to require systems changes and would want a 4 month lead time and another party believed a change may also be required to an individual network code, which will mean a longer implementation lead time would be necessary.

iGT UNC Modification Panel Discussion

The iGT UNC Modification Panel voted on the Proposal on the 18th April 2012. The Panel unanimously voted in favour of recommending implementation of the Modification Proposal.

Both User and Operator representatives unanimously agreed that the Proposal facilitated the relevant objectives a (as per the Proposers view) and f.

- **Relevant Objective a** – The Panel agreed that there are sufficient grounds to believe the proposal will (indirectly) further facilitate the efficiency and economic operation of the pipeline system by reducing the potential risks of breaching data protection laws and thus avoiding any costs associated with this issue which could otherwise be incurred by both Users and Operators.
- **Relevant Objective f** – The Panel agreed with the Proposers view that the Proposal will promote efficiency in the implementation and administration of the UNC/INC by creating a process that reduces Pipeline Users risk of breach of the DPA in the event of sensitive information relating to customer vulnerability being received by transferred in an insecure manner.

The Panel agreed that implementation should be in the next release not less than 6 months from the date of Authority Consent, should the Modification Proposal be implemented. This was primarily due to the system upgrades required by some iGT UNC parties to implement.

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Proposed Legal Text

- Insert the following wording to Section K, Clause 23.2:

“For the sake of clarity this includes invoice supporting data and Portfolio Extracts and Customer with Special Needs files sent between the Pipeline User and Pipeline Operators. When the Pipe Line Operator or User sends such data either by email or CD/DVD they must use the “**Password Protection Protocol**” as contained in the Ancillary Document.

- Insert protocol: **Password Protection Protocol** into the Ancillary Document (as per Appendix attached)

Other Information

None.