

iGT UNC / iGT INC Modification Proposal

Date	13 October 2009
Urgency	Non Urgent
Reference	iGT026V
Status	For Consultation
Title	Password Protection Protocols for invoice supporting data and Portfolio Extracts
Proposer	E.ON, Kate Potts
iGT UNC / Pipeline Operator	iGT UNC Section K clause 23 New iGT UNC Ancillary Document - 'Password Protection Protocols'
Modification Proposal Dates	<i>Circulation: 20/11/2009</i> <i>Response: 11/12/2009</i> <i>Circulation of DMR: 06/01/10</i> <i>Response to DMR: 27/01/10</i> <i>FMR sent to authority: 24/02/10</i>

Urgency

Non Urgent

Background

The DPA 1998 Part 1 of Schedule 1 requires companies to deploy “appropriate technical and organisational measure” to protect personal data. Large amounts of commercially sensitive data, namely invoice supporting data and portfolio extracts, are sent from Pipeline Operators to Pipeline Users in insecure formats.

In order to ensure that only parties entitled to receive and use the data contained within these files are able to view the data, it is imperative that measures are introduced to protect access to this data.

Without this protection, parties who receive data relating to another Pipeline User may open and use this data without restraint. Similarly should the email or discs be received by unintended recipients, the data is no longer secure and parties would therefore be in breach of their DPA obligations.

The Proposal

The proposal seeks to

1. Stipulate the application of password protection requirements into Section K, Clause 23.2 “Protected Information” in relation to the transmission of Portfolio Extracts and invoice supporting data either via email, CD or DVD.
2. Create an Ancillary Document which details the Password Protection Protocols and their application.

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Suggested timescale for implementation

Without the protection this proposal creates, there is a risk that confidential and commercially sensitive data can be received by parties not entitled to receive it and there are no restrictions on their ability to view the contents. In light of this and the risks of potential breach of the DPA we would urge parties to consider a very early implementation timescale, but certainly no later than 4 months from Authority Consent.

How will the proposal operate?

The Ancillary Document “Password Protection Protocol” details how all Pipeline Users will provide Pipeline Operators with passwords to enable the Pipeline Operator to protect invoice supporting data and Portfolio Extracts before sending them to the Pipeline Users.

Facilitation of the relevant objectives:

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 Operators risk of breach of the DPA in the event of confidential and commercially sensitive information relating to customer supply points being received by unintended recipients.

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. When the Pipe Line Operator sends such data either by email or CD/DVD they must use the “**Password Protection Protocol**” as contained in the Ancillary Document.

Insert: **Password Protection Protocol** as an Ancillary Document.

Responses to Consultation

Comments to this Consultation are welcomed by 11 December 2009.

In particular, comments are welcomed on:

- How this Modification better facilitates the Relevant Objectives;
- Whether this Modification impacts on other Industry Codes or Agreements;
- Whether there are impacts on systems or processes; and
- Your view of the proposed implementation timescale.

Responses should be returned to the iGT UNC Representative, Genserv Ltd at iGT-UNC@genserv.com or faxed to 020 7090 1001