



**NETWORKS**

# **ESB Networks**

## **Presentation to the IGG**

**16<sup>th</sup> January 2019**

Thank for help and co-operation over the Christmas & New Year period and for providing the emergency contact details in respect of the PAYG teams.

Emergency credit changes being implemented this week. All will be updated by Friday 18<sup>th</sup> Jan to be implemented 29<sup>th</sup> January (Tuesday). Have suppliers communicated to their customers – copies available?

Data Sharing Agreement

Supplier View Extract – “A Data Sharing Agreement is required between suppliers and ESB Networks for the following reasons:

## **Clarity on the data processing relationship**

... It is not clear whether a Controller to Controller or a Controller to Processor relationship exists (or perhaps another iteration). Article 28 GDPR states that processing by a data processor shall be governed by a contract that is binding on the processor with regard to the processing, the subject matter and duration of processing, the nature and purpose of the processing, the type of personal data and categories of data subjects and the obligations and rights of the controller.

## **Overarching governance documentation is needed**

As Suppliers and ESN share data for a number of reasons (on an ad-hoc basis, Extranet access, Meter Point Registration, market messaging) our recommendation would be to put in place one Data Sharing Agreement which would sit above the existing agreements, to cover all of the purposes and ways that Suppliers and ESN share data, rather than updating the existing agreements separately.

## **Liabilities**

.... it is important to set out in a Data Sharing Agreement how liability would be apportioned between ESN and suppliers if there were to be a breach”.

## Data Sharing

ESBN has listened to industry over the last number of months and agrees to explore a Data Sharing Agreement on behalf of participants.

### **Proposed High Level Approach**

- Commence into an assessment of what may be required under varying options;
- Link with third parties (including GNI) on offerings presently available in the market place;
- Provide updates to the IGG and share learnings/proposals;
- Agree way forward.

This is potentially a long project and will absorb time for all participants. ESNB's role will be to work closely with Market Participants to progress this project as outlined in the approach above.