

Joint Office

[Enquiries@gasgovernance.co.uk](mailto:Enquiries@gasgovernance.co.uk)

8 November 2018

Dear Joint Office,

**Re: UNC Modification Proposal 0660S – Amendment to PARR permissions to allow PAC to update with UNCC approval**

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this Modification.

**NGN supports this Modification Proposal**

**Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

We agree that this modification would further Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code, as it would improve the PARR reporting arrangements by reducing the time and administration required to get key information and data needed to support PAC investigations.

**Reasons for support/opposition:**

We support this modification because it would decrease the time required for requesting a change of reports for the Performance Assurance Committee (PAC). This decrease will improve the timeliness of their investigations and allow PAC to be more responsive.

**Self-Governance Statement:**

*Please provide your views on the self-governance statement.*

We agree that the Self-Governance procedure should apply for this modification due to the change being a minor administrative change to the governance of PAC reports and should have no material impact on systems or processes.

**Implementation:**

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

We agree that this modification could be implemented in line with the Self-Governance procedure, 16 business days after approval, subject to appeal.

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Service on 0800 111 999

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Thorpe Park Business Park  
Colton, Leeds LS15 8TU

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**Impact and costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

We have not identified any additional costs, nor direct impacts to NGN as a result of this modification.

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

Yes, we agree that the legal text provided delivers the solution specified in the modification.

**Are there any errors or omissions in the Modification Report?**

None identified.

**Any additional analysis or comments?**

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Shanna Key (via email)  
Industry Codes Officer

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