

Representation - Draft Modification Report UNC 0660S Amendment to PARR permissions to allow PAC to update with UNCC approval

Responses invited by: 5pm on 08 November 2018

To: enquiries@gasgovernance.co.uk

Representative:	Stewart Alexander
Organisation:	npower
Date of Representation:	08/11/2018
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

We are in support of modification 660S. Currently, if the Performance Assurance Committee wishes to update the list of industry PARR reports, a modification needs to be raised each time that update is required. This means the PAC is not as agile and responsive to risks and issues as it needs to be. Modification 660S will provide the PAC with greater flexibility to amend the reporting register, in order to monitor and tackle issues contributing to UIG and settlement risk. The modification also provides the necessary oversight (UNCC approval) to ensure appropriate checks and balances are maintained.

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

We believe the proposal is non-material and therefore self-governance processes should apply.

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

We believe the modification should be implemented as quickly as governance processes allow.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

No development costs identified.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

We have not reviewed the legal text.

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.*

None identified.

Please provide below any additional analysis or information to support your representation

No additional comments to add.