

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:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	5 th November 2018
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

We support implementation of this proposal as it enables the Performance Assurance Committee (PAC) to request additional reports in a timely manner. UNC Committee governance is appropriate. We agree that this proposal further relevant objective (f) because it simplifies the process of changing reports used by PAC.

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

We agree that this satisfies the self-governance criteria as its implementation is not likely to have material impact on commercial matters relating to the transportation of gas.

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

This can be implemented 16 Business Days after a Panel determination.

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

None

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

At risk of being pedantic surely the legal should read:

Delete at the end 12.1 (f) "and"

Replace at the end of 12.1 (g) "." with "; and"

Add a new paragraph 12.1(h)

12.1(h) the Performance Assurance Report Registers referenced in paragraph 16.5.1.

Alternatively

In 12.1 (e) replace “not used;” with “the Performance Assurance Report Registers referenced in paragraph 16.5.1;”

We acknowledge that this option would disrupt the historical order of documents added to 12.1 which some may find useful.

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.*

No

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