

## 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](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Edward Ewan Fyfe
<b>Organisation:</b>	Scotland Gas Networks and Southern Gas Networks
<b>Date of Representation:</b>	7 <sup>th</sup> November 2018
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive

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

The proposed modification will allow for the Performance Assurance Report Register (PARR) to increase its efficiencies in requests for additional reporting items. Since implementation of the PARR in 2017, many additional reports have been identified for inclusion into the overall suite of reports. This modification simplifies the process of making changes to these reports, with additional items being submitted to the UNCC for approval rather than being subject to the lengthier UNC modification process. SGN supports this and agrees that the proposal promotes efficiency in the implementation and administration of the Code.

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

We agree with the Self-Governance Statement within the modification and that this is a non-material change.

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

Implementation should follow 16 business days after decision by the Mod Panel.

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

No SGN costs or system development has been identified.

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

Yes.

**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**

None to add.