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8th November 2018
Your Reference: UNC Modification Proposal 0660S

UNC Modification Proposal 0660S - Amendment to PARR permissions to allow PAC to update with UNCC approval

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal which Cadent would like to support.

Do you support or oppose implementation?

Support

Relevant Objective:

f) Positive

Reason for support/opposition:

The Modification, if implemented would make the Performance Assurance Report Registers (PARR) UNC related documents which can be amended with approval by the UNCC and not requiring a Modification each time a new report is identified. This change would assist the Performance Assurance Committee (PAC) in identifying and investigating potential gas settlement issues in a timely manner which should lead to a more effective Performance Assurance Framework.

The current process for PAC to gain access to reports required to carry out their duties can be slow as evidenced by Modification 0657S - *Adding AQ reporting to the PARR Schedule reporting suite* which took 4 months from initial presentation at Panel to approval being given by Panel.

Were Modification 0660S to be implemented then reports could be added to the PARR within a matter of weeks and not months.

In addition should the UNCC not be in a position to approve any PAC requested PARR changes then the current modification process can still be utilised.

Self-Governance Statement:

We agree with the Self-Governance Statement within the Modification that this is a non-material change to the UNC and can be subject to Self-Governance.

Implementation

This Modification Proposal can be implemented sixteen Business Days after a Modification Panel decision.

Impacts and Costs

No impacts or costs have been identified.

Legal Text

We have been advised of minor, non-material errors with the Legal Text provided.

If incorporated into UNC, the Legal Text would leave the term 'and' incorrectly hanging at the end of TPD V12.1(f)

Amended Legal Text has been submitted which removes the term 'and' from TPD V12.1(f) adding it to the end of TPD V12.1(g)

There was also a minor referencing error in which the provided Legal Text incorrectly referenced 16.5.1 instead of 16.5.2.

Amendment to paragraph 16.5.2 as follows:

16.5.1 Any amendment to the Performance Assurance Report.....

These errors have been rectified and amended Legal text submitted to the Joint Office.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

We have not identified any errors or omissions.

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

We have nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07884 113385 (andy.clasper@cadentgas.com) should you require any further information.

Yours sincerely,

Andy Clasper
Framework Specialist, Regulation & External Affairs