

Representation - Draft Modification Report UNC 0674V

Performance Assurance Techniques and Controls

Responses invited by: 5pm on 20 May 2022

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	20 th May 2022
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive
Relevant Charging Methodology Objective:	Not Applicable

The consultation is aimed at establishing if the content/effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0674V will be carried forward should parties not wish to change their original representation.

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

WWU is now able to support this varied modification. We are satisfied that the areas of concern that we raised in our response to the consultation on 0674 have been addressed sufficiently to enable us to support 0674V. WWU has always supported the intent of 0674 but we had concerns regarding transparency and governance. We agree that this modification will further relevant objective (d) *securing of effective competition between relevant Shippers* by enabling the Performance Assurance Committee (PAC) to improve settlement accuracy and reducing settlement risk and will further relevant objective (f) *Promotion of efficiency in the implementation and administration of the Code* by giving PAC powers to take appropriate action to improve settlement accuracy rather than just observe poor performance.

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

We agree that 3 months between Authority Direction and implementation is appropriate as long as there is an adequate communication plan. We would expect the PAFA to table this at the first PAC meeting following the Authority Direction to implement, if this is not possible then a further month should be added to the implementation period.

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

We do not anticipate significant cost.

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.*

No

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

Although the ability of PAC to amend the PAF Document is still in the text we are willing to rely on the assurances made in workgroups that developed 0674V from 0674 regarding the way changes would be discussed and possibly consulted on; however, we would have preferred a different solution.