

## Representation - Draft Modification Report UNC 0674V

### Performance Assurance Techniques and Controls

**Responses invited by: 5pm on 20 May 2022**

**To:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Sally Hardman
<b>Organisation:</b>	Scotland Gas Networks Ltd and Southern Gas Networks Ltd
<b>Date of Representation:</b>	20 <sup>th</sup> May 2022
<b>Support or oppose implementation?</b>	Comments
<b>Relevant Objective:</b>	d) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	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)**

SGN is satisfied that on the whole our previous concerns raised in Mod 0674 have been addressed. SGN supports the intent of Modification 0674V to facilitate the implementation of a robust framework for the Performance Assurance Committee (PAC) to utilise and ultimately improve its duties in relation to the settlement of gas.

The modification uses the industry model set out for the committees under the Data Services Contract (DSC) which, although independent of UNCC, are constrained by UNC General Terms D. DSC Committees do not have the ability to unilaterally change those powers, and there is a degree of transparency through the publishing of meeting minutes

However, this modification proposes to provide full autonomy to PAC, removing its status as a UNC sub-committee and although no longer maintaining the fully closed status of the meetings and minutes this remains a deviation from the DSC model.

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

**We would support a transition period of 3 months between the Authority approval and implementation as this will provide sufficient period to communicate the changes to impacted industry parties.** **Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

No material costs have been identified at this time however the risk remains it could ultimately impact UNC party contracts with third parties.

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

We believe the legal text delivers the intent of Business Rules.

**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.*

Nothing further to add.

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

Nothing further to add.