

Comparison of the Existing Performance Assurance Framework Document (PAFD) with the PAFD draft included in UNC Modification 0674

New PAFD Section	New PAFD Section Title	Summary Requirements	Included Existing PAFD?	Comment
7.1	PAFA Scope	<p>Calls out all PAFA Activities:</p> <ul style="list-style-type: none"> <li>• Management of a Register of Risks to Gas Settlement</li> <li>• Development/maintenance (including periodic updates) of a Gas Settlement Risk Model</li> <li>• Collation, validation, publication and interpretation of a suite of reports on Shipper Performance, with appropriate versions for each channel</li> <li>• Provision of expert advice on Gas Settlement and associated risks</li> <li>• Administration of the service</li> <li>• Management of changes to the service</li> <li>• Liaison with UNC parties in relation to areas of Settlement performance</li> <li>• Use of Performance Assurance Techniques (PATs) as requested by PAC</li> <li>• Co-ordination of the Annual PAF Review</li> </ul> <p>On request from PAC the PAFA will provide the role of champion to UNC Modifications that are relevant to Settlement and/or Performance Assurance, where the Modification Proposer is unable to do so. <i>The scope will be subject to periodic updates as requested by PAC. CDSP will use reasonable endeavours to put place suitable terms with PAFA for the delivery of any such change in scope as soon as practicable.</i></p> <p><i>PAFA will update the PAFD as appropriate and publish. To the extent that any such changes would reasonably be thought to affect PAPs PAC will endeavour to give at least 3 months' notice.</i></p>	Schedule 2 'Services Schedule' (Doc 4)	<p>Everything is the same word for word, with the following three exceptions which are covered under separate sections below:</p> <p>Use of Performance Assurance Techniques (PATs) as requested by PAC (covered in section 20)</p> <p>Additional scope in new PAFD is highlighted in italics below. Basic requirement required in existing PAFD was removed from services in last procurement.</p> <p><i>" The scope will be subject to periodic updates as requested by PAC. CDSP will use reasonable endeavours to put place suitable terms with PAFA for the delivery of any such change in scope as soon as practicable. "</i> (see also section 15)</p> <p>PAC will update the PAFD as appropriate and publish. To the extent that any such changes would reasonably be thought to affect PAPs PAC will endeavour to give at least 3 months' notice. (covered in section 13)</p>
13	Potential extension of this Performance Assurance Framework Document (PAFD)	Document to be developed and maintained up to date by PAFA (under instruction from PAC). Once updated, PAFA to conduct Comms to all Parties to advise of changes	Not referenced	<p>Not stated in previous services.</p> <p>Legal drafting requires Code Administrator to do the Comms contrary to PAFD</p>
15	PAC sponsored UNC modifications	PAFA to support writing of potential UNC modifications should PAC desire them	Schedule 2 'Services Schedule' (Doc 4)	Legal drafting in Code does not support 'PAC sponsored UNC modifications' but does support 'PAC supported UNC modifications' - section in new PAFD to be amended.
16	Support for UNC Parties	PAFA to meet the CDSP Customer Advocate Managers (CAMs) on a regular basis. PAFA will also provide secure platform for sharing reports with CDSP	Not referenced	Not stated in previous services - now is specifically called out as a requirement - PAFA have been meeting this requirement in recent years.
17.1	Annual PAF Delivery Plan	PAFA to identify plan to communicate what the PAF will deliver over the next 12 months and the benefit to Settlement in doing so. A draft version of the plan will have industry consultation to manage as well as the production of the plan	PAFD Section 9	This is separate to the Annual Review. Budget and Plan consultation not a requested PAFA requirement. Process will be intertwined in revised Annual Review approach.
17.2	Annual PAF Review	<p>Review managed by PAFA, and consulted with industry</p> <p>PAFA to write report on previous 12 months highlighting work of the PAC, and also include written consultation on the service</p> <p>PAFA then write further doc to address each area of concern raised by industry</p>	Schedule 2 'Services Schedule' (Doc 4)	Not previously called out to this level of detail but has been happening under 'Co-ordination of Annual PAF Review'. Annual Review approach will require revision involving two stage consultation process between April and August. Previously required post contract anniversary. Additional PAFA requirement to produce document showing how areas of industry concern might be addressed.
19	Performance Assurance risk register	Specifies exact format and requirement of identifying risks. PAFA will receive and update risk registers accordingly subject to initial validation of risk	Schedule 2 'Services Schedule' (Doc 4)	Not previously called out in this level of detail but has been happening under 'Management of a Register of Risks to Gas Settlement'. New PAFD is more prescriptive on approach and templates. Process revision required.
20.2	Monitoring	PAFA to support PAC to determine the Data Provider for monitoring. Could include "self reporting" by the UNC Party, the CDSP or Other UNC Parties.	Not referenced	Not previously stated but as PAC carry this out, expect PAFA to support. Not explicit about what this involves.
20.3	Party Communication	<p>PAFA to manage contact lists</p> <p>PAC to instruct PAFA from time to time to letter contacts if concerned about performance.</p>	Not referenced	Not stated in previous services - could have fallen under 'liaison with UNC parties in relation to areas of Settlement performance' which is listed under Schedule 2 previously.
20.4	Relevant Third Party Engagement	PAFA to communicate and seek performance improvements from relevant third parties.	Not referenced	Code requirement to provide day to day contacts and senior level contacts. PAFA required to administer and maintain under PAFD. Currently no contacts held or managed by PAFA. Revised contact list requested from Correla on all occasions needed.
				New requirement

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20.6	Request for a Resolution Plan	<p>PAC can request a Resolution Plan from the Party to resolve an issue. PAFA will engage with the Party during development of the plan (duration up to 2 months). If plan not up to standard then PAFA to manage an improved revised submission from the Party. PAFA will then monitor the plan with the Party through regular meetings</p>	Not referenced	<p>New service in PAFD. PAFA have requested improvement plans in recent years without PAC vires being in place. Process has evolved over time.</p> <p>New PAFD prescriptive on process &amp; provides templates. PAFA will review and adjust current processes and procedures. Managing of the negotiation and review of Resolution Plans will be required (expected elapse time 1-2 months) to be agreed before plan executed. Monitoring against plan and all PAC to PAP communications in this matter will be required.</p> <p>Incorrect application of PAT's and this procedure will be grounds for an Appeal implying additional responsibility and risk.</p> <p>All ambiguity will need to be removed from the prescribed processes and procedures to mitigate risk.</p> <p>The ongoing workload will depend on quantity, frequency and duration of Resolution Plans that the PAC requires from Parties.</p>
20.12	Transitional Arrangements	<p>PAFA will communicate to wider industry the content of UNCO674 and the Performance Assurance Regime. This will include (but is not limited to):</p> <ul style="list-style-type: none"> <li>• An Industry 'awareness' event</li> <li>• Industry training sessions</li> <li>• Party specific training sessions</li> <li>• Publication of PATs process</li> <li>• Publication of supporting documentation</li> </ul> <p>The PAFA will also engage with each Shipper and request contact details and job title of their nominated PAC Representative.</p>	Not referenced	<p>Presumed to be transitional 'one off events'. Use of GPAP and the 'Annual Review' industry event will support partially.</p>
21	Appeals Procedure for the PAF	<p>If a Party appeals an Authority referral then PAFA are required to provide a view on the validity of that appeal. They may also be requested to attend a UNCC hearing.</p>	Not referenced	<p><b>Code requirements:</b></p> <p><b>16.8.2</b> The only grounds on which such an appeal may be made are:</p> <p>(a) .....; or</p> <p>(b) the Performance Assurance Committee did not follow the procedures set out in the Performance Assurance Framework Document.</p> <p><b>16.8.4</b> Where notice of appeal of a decision of the Performance Assurance Committee is given in accordance with paragraph 16.8.3:</p> <p>(a) .....;</p> <p>(b) .....;</p> <p>(c) .....;</p> <p>(d) prior to the meeting of the Performance Assurance Committee at which the appeal is considered:</p> <p>(i) the PAFA will report to the Performance Assurance Committee on the PAFA's views of the validity of the appeal;</p> <p>(ii) .....;</p> <p>(iii) .....;</p> <p>This workload will depend on quantity and frequency of appeals from Parties</p>