

Representation

Draft Modification Report

0479S - Inclusion of email as a valid UNC communication

Consultation close out date: 05 February 2015
Respond to: enquiries@gasgovernance.co.uk
Organisation: British Gas Trading
Representative: Andrew Margan
Date of Representation: 05 February 2015

Do you support or oppose implementation?

Qualified Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

In principle British Gas supports the introduction of email as a valid UNC communication. Modification UNC479 will codify industry email communications already in use, plus it will align the gas industry with the electricity industry, which already uses email.

We note that Modification UNC479A, now UNC522 seeks to introduce a communications register. As some email communications may have a high shipper impact, we believe an email communications register could be a good idea. It will be useful to know what communications will be sent via email and who the emails are sent to. Therefore we support the development of a communications register, similar to the Xoserve fax register process.

Notwithstanding the above, as a register can be developed through the UNC522 Workgroup and UK Link maintains control over certain email communications, we support this proposal.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

No new issues with this proposal have been identified.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

As the proposal does not material impact competition, we believe the modification should follow the self-governance rules.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree this proposal supports promotion of efficiency in the implementation and administration of the Code

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

No implementation costs have been identified, although a high value email communication, which is not communicated correctly, may result in a financial impact to shippers.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

No lead time is identified, although we would expect specific email usage to be approved by UK Link, which may require individual lead times.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

No