

## 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:** RWE npower  
**Representative:** Kiran Samra  
**Date of Representation:** 05 February 2015

#### Do you support or oppose implementation?

Support

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

RWE npower supports the use of email as a valid form of communication within the UNC in order to allow reliable and efficient communication to flows between parties. Changes will be needed to General Terms, section B of the UNC to allow e-mail as a valid form of communication notice alongside post and facsimile.

As email is already regarded as a valid form of communication within the electricity industry it would be beneficial to align the gas industry to this. Email is currently being used by some parties and therefore means they are non-compliant with the UNC. This modification will resolve the issue and introduce appropriate governance measures under the UK Link.

RWE npower notes that some emails are deemed to be of high importance and therefore a process will need to be introduced to safeguard Shippers so that they do not suffer financial impact caused by email failing to be communicated/ delivered.

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

None

#### Self Governance Statement:

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

RWE npower believes that this modification should follow the self-governance rules.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

#### **Objective F: Promotion of efficiency in the implementation and administration of the Code.**

The use of email reflects current practice and this will be a positive benefit to this relevant objective.

**Impacts and Costs:**

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

There have been no costs identified with the implementation of this modification. It does however require controls in place to monitor the delivery of emails to mitigate the risk of an email that isn't communicated correctly having a financial impact on a party.

**Implementation:**

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

If the panel agrees that this modification meets the self-governance criteria then the modification can be implemented 16 days after a Mod Panel determination.

**Legal Text:**

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

RWE npower is satisfied that the legal text delivers the intent of the modification.

**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.*

None.