

Representation - Draft Modification Report 0522S (formerly 0479A) - Inclusion of email as a valid UNC Communication

Responses invited by: **10 December 2015**

To: enquiries@gasgovernance.co.uk

Representative:	Kiran Samra
Organisation:	RWE npower
Date of Representation:	8 th Dec 2015
Support or oppose implementation?	Qualified Support
Relevant Objective:	f) None

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

RWE npower are only able to give qualified support for this change. Even though we do agree that ensuring emails are sent to the correct recipient is beneficial, we feel that the change creates a highly administrative process. A process we don't believe would be kept up to date by the industry and would quickly become out of date.

We also believe that the responsibility of ensuring the correct contacts are in place should be a role for the Administrator and not the transporter. Within section 15, schedule 24 of SPAA, the administrator carries out annual checks to ensure the emails are correct and therefore a up to date list is maintained. We believe this could be a similar process adopted by the UNC adminitstror.

Email has been used within the industry unofficially for a number of years and there haven't been any issues raised by any party to say where this has failed or caused a financial impact. Also given that UNC479S has been implemented with governance rules for the use of email within the industry, we believe there is very little stated why extra governance rules are needed. Rather that this change will add complexity rather than being value add.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

RWE npower believe that the self-governance criteria has been met, as it isn't a material change, as it's placing rules around email communication only.

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

A suitable time to ensure all parties have had sufficient time to review existing processes.

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

None

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

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

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.*

None

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

None