

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:	Mark Lyndon
Organisation:	National Grid NTS
Date of Representation:	10/12/15
Support or oppose implementation?	Oppose
Relevant Objective:	f) Negative

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

National Grid NTS (NG NTS) recognises the potential benefits of email. We offered qualified support in response to the previous UNC email modification 0479S highlighting a number of concerns, some of which were centred on the governance arrangements for the use of email as a code communication. These included

- Arrangements for parties to agree between them what information can be communicated via email
- Defining a primary person within an organisation responsible for resolving email communication failures
- How the UK-Link Committee should manage current and future changes to Appendix 5B of the UK Link manual.

We are supportive of the general principles being raised via modification 0522 as it is seeking to introduce more robust rules around the governance of email communications. However, we are concerned that there is not a clear understanding of how this modification will be implemented in practise. This is further exasperated by the late change to the solution to introduce an email address check upon first use. The impact of this change and any potential system impacts on Xoserve have not been investigated as part of the workgroup discussions.

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

National Grid NTS agreed that this modification proposal could be self - governance as it only considered to putting in place rules for the governance of email communication. Given the changes made to this proposal since it was raised we believe it still qualifies as a self-governance modification proposal.

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

As highlighted in the draft modification report, timescales may need to be extended for transporters to review their existing email practises to ensure processes comply with the requirements of the modification. Alongside this Xoserve is undertaking a review of Appendix 5B to establish code communications, and these will need to be reviewed and confirmed.

As areas of the modification still need further development, it is difficult to provide a clear view on the necessary implementation timescales. However NG NTS are of the view that this 'test' email upon first use may need to be inserted as a new communication in the UK Link Manual, therefore requiring UK Link Committee approval.

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

The modification in principle does not appear to have any major impacts or costs. This is with the exception of the late change to the solution to introduce an email address check upon first use. It is unclear whether this will introduce increased Xoserve costs.

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

Due to the additional late changes National Grid NTS does not believe there is enough clarity around the business rules and the associated legal text to agree that the text successfully 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

If this proposal is to progress, NG NTS believe that the modification requires clarity on how the 'test' email on first use will work. In particular how any 'test' email is recorded between the sender and the recipient, and what criteria will constitute an email reaching the addressee. Current UNC rules state that an email has deemed to have reached the 'addressee' 1hr after sending, subject to a non-delivery receipt being received by the receiver. Any additional rules around a 'test' email to ensure the email address is valid may come into conflict with the deeming rule. If the intention of the Modification Proposal

is to remove the deeming rule for 'test' emails, the solution will need to be revised to clarify the rules under this circumstance.

NG NTS also believe that further clarification is required on how the co-ordination of sending and receiving emails will work, who will control email address lists and timescales. In addition we seek confirmation that there will be no requirement for additional funding to support these processes.