

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:	David Mitchell
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	10 th December 2015
Support or oppose implementation?	Comments
Relevant Objective:	f) Negative

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

SGN welcomes the opportunity to provide a response to this modification. We agree with the principle behind the modification that a mechanism that ensures information is sent to the correct recipient(s) would be beneficial. However, we do feel that this modification creates unduly administrative processes and so would not necessarily further relevant object f) in terms of promoting efficiency.

Alternate methods of code communication (e.g. facsimile) have been in operation successfully for many years, without the need for a central register and so it is not clear why these administrative processes are now required. Additionally, we do not believe placing a duty on parties to resolve the failure of an undelivered email within one hour would be a measurable and enforceable obligation. We note that the introduction of UNC Modification Proposal 033, 'Notification to Users of Emergency Incidents – Impacts on Code Communications' allows use of emails during emergency incidents but did not create a central register.

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

When email was accepted as an approved form of code communication under MOD0479, self-governance criteria were met due to there being no material impact on competition or consumers. We believe this modification follows similar principles and would not impose a change more significant than the introduction of email as a communication method and should also follow self-governance criteria.

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

TBA

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

None identified.

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

Yes

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.*

Without evidence to suggest emails are currently being misdirected, we do not believe the increased administrative burden proposed by this modification is justified.

Also, the modification sites Ofgem's decision letter on MOD0033 as key justification for this proposal but the letter spoke of security around information within said emails, not security of delivery.

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

None