

Bob Fletcher  
Joint Office of Gas Transporters  
31 Homer Road  
Solihull  
B91 3LT

Andy Clasper  
Stakeholder Delivery  
National Grid Distribution  
Andy.clasper@nationalgrid.com  
Direct tel +44 (0)1926 655299

[www.nationalgrid.com](http://www.nationalgrid.com)

10<sup>th</sup> December 2015  
Your Reference: UNC Modification Proposal 0522S

## UNC Modification Proposal 0522S – Governance of the use of email as a valid UNC communication

Dear Bob,

Thank you for your invitation seeking representation with respect to the above Modification Proposal. National Grid does not support implementation of 0522S.

### **Do you support or oppose implementation?**

Not in support

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

We are unable to support Modification Proposal 0522S on the basis that we don't believe the case has been made for the requirement of an additional governance step in the transaction of e-mail notifications. We have not been aware of any evidence in the nine months since implementation of Modification 0479S Inclusion of email as a valid UNC communication of an e-mail failure which would necessitate potentially unwarranted and burdensome governance arrangements; certainly no such evidence has been presented at the 0522S workgroup. It is therefore difficult to see how instigating additional controls to govern an apparently satisfactory code communication mechanism could be viewed as furthering Relevant Objective (f).

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

In our view, rather than create additional arrangements at this time which would establish an arguably overly cumbersome mechanism to ensure the certainty of an e-mail arriving at a specified e-mail address, it would be preferable to carry out a review of Modification 0479S after an appropriate time has elapsed. This would be specifically to quantify and assess any instances of failure, the consequences of such failure if this occurred and actions taken to identify and remedy the root cause of such failure. As suggested above there is a risk that Modification 0522S may be attempting to provide a solution to an issue that does not exist.

Furthermore, given that Modification 0479S was deemed implementable without the need for additional governance measures at the time and that no evidence of a failure in e-mail transactions has been identified, we suggest that the raising of Modification 0522S may be premature.

### **Self Governance Statement:**

We agree that the Modification Proposal should be subject to self-governance procedures given there is no material effect on gas consumers.

### **Relevant Objectives:**

Relevant Objective: f) Promotion of efficiency in the implementation and administration of the Code.

We do not believe that the measures identified within the Modification Proposal warrant implementation given that no evidence of the need for such arrangements exists. On this basis the Modification as drafted does not promote efficiency in the implementation and operation of the Code.

### **Impacts and Costs:**

We agree with the statement in the Draft Modification Report concerning the funding of this Modification Proposal.

### **Implementation:**

We agree with the statement in the Draft Modification Report that implementation could take place sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

### **Legal Text:**

NGD is satisfied that the legal text and commentary as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

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

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me should you require any further information.

Yours sincerely,

Andy Clasper  
Stakeholder Specialist  
National Grid Distribution