

Response received by Email

Joint Office of Gas Transporters Future Status Update

Date: 06 May 2021

Organisation:

Gazprom Energy

Abstract:

Whilst we believe the proposal has some merit we remain concerned that the solution, as set out, fundamentally fails to address the lessons of the Funding Governance & Ownership (FGO) review of Xoserve i.e. that the business should be not solely within the control of one group of stakeholders.

I appreciate that to fully achieve separation we may need to change the licencing arrangements however we should not lose site of the lessons and deliver a suboptimal solution.

Assuming a suitable ownership structure was instituted in a timely fashion i.e. it was present from day 1 or a clear glidepath and commitment was in place then there are clearly a number of opportunities for an unfettered Joint Office: -

- Becoming a Code Manager for both UNC & iGT UNC incl. being able to bring forward changes and consolidate
- Centralised Legal Support including text production
- Digitization of the Governance process including change process

Perhaps slightly more commercial areas.....

- PAFA
- AUGÉ
- Shrinkage
- Metering Error
- Alternative Dispute Resolution (ADR)

Regards

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