

Representation - Draft Modification Report 0520 0520A Performance Assurance Reporting

Responses invited by: 10 March 2016

To: enquiries@gasgovernance.co.uk

Representative:	Jonathan Kiddle
Organisation:	EDF Energy
Date of Representation:	10 March 2016
Support or oppose implementation?	0520 – Support 0520A - Support
Alternate preference:	<i>If either 0520 or 0520A were to be implemented, which would be your preference?</i> 0520A
Relevant Objective(s):	0520 a) None d) Positive 0520A a) None d) Positive

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

EDF Energy believes that both modifications would provide a route to identify potential issues within settlements allocation processes and then assess them. It would encourage industry to focus on improving the accuracy of settlements performance.

We believe that these modifications, if implemented, could provide the industry with evidence which would enable the setting of effective and efficient targets that would promote competition. If the incentives were appropriate then we would either be compensated if a party does not perform or it will mean that the other party would have to invest to meet the targets. These modifications will provide greater transparency to the industry on the performance of different parties against the obligations as set out in the UNC.

The implementation of UNC 0520 or UNC 0520A will ensure that existing reporting is formally included into the UNC.

Our preference is for UNC 0520A to be implemented, we believe that UNC 0520A proposes more relevant reports that industry parties would value greater. Some of the proposed UNC 0520 reports do not add value to industry parties such as 2.8 (which shows the AQs that have not updated within industry timescales); This report in theory should be the same as the MPRNS that have not reconciled. Each report will cost industry money and therefore there is no value in two reports showing the same information.

Under UNC 0520A, uncensored reports will only be sent to the Performance Assurance Committee (PAC). Under UNC 0520 these reports will be release to all Shippers; this could mean that Shipper commercial activities e.g. meter read strategies could be identified from some of the reports.

We believe that both UNC 0520 and UNC 0520A would better facilitate Relevant Objective (d) as there will greater understanding of Shipper settlements performance which could deliver greater incentives to Shippers to facilitate more accurate allocation of energy and appropriate targeting of costs.

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

n/a

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

As soon as practicably possible

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

n/a

Legal Text: *Are you satisfied that the legal text and the proposed Agency Charging Statements (ACS) (see www.gasgovernance.co.uk/proposedACS) will deliver the intent of the Solutions?*

n/a

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.*

n/a

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

n/a