

## Representation

### Draft Modification Report

#### 0479S - Inclusion of email as a valid UNC communication

**Consultation close out date:** 05 February 2015  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** National Grid NTS  
**Representative:** Martin Connor  
**Date of Representation:** 05 February 2015

#### Do you support or oppose implementation?

Qualified Support

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

Whilst National Grid NTS recognises the potential benefits of email and wishes to support its use where appropriate, it is our view that the introduction of email may lead to significant Code Communication change. Therefore, robust rules are required in several areas which are currently absent from the modification proposal. These areas are: agreement to use email by both parties; introducing and managing primary email contacts within organisations; and adequate proof of delivery and receipt of emails. We welcome the exclusion of UK Link communications and Contingency arrangements from the scope of this proposal.

However, National Grid NTS also recognises that this is a limited first step and that nothing prevents further modifications being proposed as the use of email develops.

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

No

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

#### f) Promotion of efficiency in the implementation and administration of the Code.

Where the use of email reflects current practice there may be a positive benefit to this relevant objective. However, National Grid NTS is uncertain as to whether efficiency will necessarily be promoted, as a 'blanket' right to use email for many

Code Communications, combined with a lack of robust rules on sending and receipt in particular, may actually result in inefficiencies.

**Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

N/A

**Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

N/A

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

Yes

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

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

As the use of email develops National Grid NTS believes that the following areas will need to be addressed:

- Arrangements for parties to agree between them what information could be communicated by email
- Defining a primary person within an organisation responsible for resolving email communication failures
- Determining whether communication has been achieved, and setting out obligations to define and manage any non-delivery
- How the UK Link Committee should manage current and future changes to Appendix 5B of the UK Link Manual.