

Representation - Draft Modification Report 0520 0520A Performance Assurance Reporting

Responses invited by: 10 March 2016

To: enquiries@gasgovernance.co.uk

Representative:	Edward Hunter
Organisation:	RWEnpower
Date of Representation:	10 th 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> Neutral.
Relevant Objective(s):	0520 a) Positive d) Positive 0520A a) Positive d) Positive

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

RWEnpower supports the introduction of a performance assurance framework within the Gas Market and believes that both of the modifications represent a significant improvement to the current baseline and furthers code objectives.

Modification 0520 has a broad coverage of measurements that would enable UNC parties to track Gas Shipper activities that impact industry settlement processes. It would also provide a useful view of post-Nexus industry processes (such as AQ Revision, MPRN Reconciliation, Use of AQ Correction and Meter Reading Process

Health-check.) The transparency that Modification 0520 delivers might also incentivise shippers to optimise activities that may have an impact on Unidentified Gas Allocation.

Modification 520A ensures that reporting is confidential and can be assessed by the PAC to reduce the risk of erroneous or misinterpreted data being placed within the public domain. This results in parties being incentivised by peer comparison rather than public disclosure and fits alongside the intention of Modification 0506 which requires members of the PAC to agree to sign disclosure and confidentiality agreements to ensure they act in the best interests of the industry. This extra step means that data can be interpreted correctly prior to publication. A future step may be required to publish this with increased transparency following the implementation of Project Nexus and the required maturity of settlement data is achieved.

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

RWEnpower agree that this is not a self-governance modification.

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

This modification should be implemented as soon as possible.

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

RWEnpower would not face any costs from the implementation of these proposals.

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?*

The legal text delivers the intent of both solutions although Modification 0520 does not specify how the reports are to be published.

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.*

No

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

None