

## 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:** Scotland & Southern Gas Networks  
**Representative:** David Mitchell  
**Date of Representation:** 05 February 2015

#### Do you support or oppose implementation?

Support

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

SGN is supportive of this modification as we believe that email is an important and efficient secure form of communication that should be included as a valid means of code communication. SGN notes that email has been an allowable form of communication in the electricity industry for more than 10 years and is currently used in a variety of processes that are similar to those used by the gas industry.

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

None.

#### Self Governance Statement:

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

We agree with the modification panel's decision that this modification should be a self governance modification as we can see no direct impacts on end users or on competition within the gas industry.

#### Relevant Objectives:

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

The implementation of this modification will further relevant objective (f) promotion of efficiency in the implementation and administration of the code. The use of email is an efficient form of communication and has many advantages such as notification systems that allow the sender to see if the email has been received and read. Email also has the flexibility of being able to be received on a mobile device, which other forms of communications are unable to do thus increasing the speed at which the communication can be sent and received.

**Impacts and Costs:**

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

SGN has not identified any costs that would impact our business if this proposal is implemented, as the modification simply allows email to be used as a code communication within the UNC.

**Implementation:**

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

As this is a self-governance modification there is no reason why this modification cannot be implemented 16 business days after a UNC Panel determination has taken place.

**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.*

N/A