

Representation - Draft Modification Report 0506 0506A

Gas Performance Assurance Framework and Governance Arrangements

Responses invited by: **12 November 2015**

Representative:	David Mitchell
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	12 th November
Support or oppose implementation?	0506 - Oppose 0506A - Support
Alternate preference:	<i>If either 0506 or 0506A were to be implemented, which would be your preference</i> 0506A
Relevant Objective:	d) Positive f) Positive

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

SGN supports the implementation of modification 506a. This modification provides a platform to build a performance assurance framework without the need for the industry to spend time and money undertaking a competitive tender process. Modification 506 would require a competitive tender process to appoint a Performance Assurance Framework Administrator the cost of which would ultimately be borne by end users. As Modification 506a is not an enduring modification it gives the industry the flexibility to run the performance assurance framework for a limited period of time, allowing any benefits to be properly assessed which will allow an informed decision to be made regarding the future of the process. One drawback with Modification 506 is that it doesn't allow data to be passed to non-code parties which would restrict the ability of this modification to add any value to industry processes should the PAFA be a non-code party.

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

We agree with the implementation timescales in the final workgroup report.

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

None

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

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.*

None

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

We don't have any further analysis.