

Representation - Draft Modification Report 0520 0520A Performance Assurance Reporting

Responses invited by: 10 March 2016

To: enquiries@gasgovernance.co.uk

Representative:	Hilary Chapman
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	10 th March 2016
Support or oppose implementation?	0520 - Support 0520A – Qualified Support
Alternate preference:	<i>If either 0520 or 0520A were to be implemented, which would be your preference?</i> 0520
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)

SGN supports the intention of the Performance Assurance Framework, and the reports proposed under these modifications. We consider that the proposed Performance Assurance Reporting will improve the performance of industry parties by increasing transparency and introducing a framework of performance measures which will act as targets for improvement.

While we support the intention of the Performance Assurance Reporting, we are mindful that reporting measures must be able to show that they are focussed on areas in which demonstrable issues have been identified, in order to ensure that the reporting regime is

efficient and effective. We would like to see the Performance Assurance Committee as defined under modification 0506, when in place, demonstrate a continued commitment to reviewing the reports proposed under these, and any future modifications, against these criteria.

520A proposes that a soft-landing approach is adopted due to the significant changes to the central systems which are currently taking place. While we understand and agree that this may influence Shipper performance on either an interim or more enduring basis, we consider that as all parties are subject to the same factors, this is not sufficient reason to sacrifice the transparency benefits achieved through non-anonymised reporting.

With the above in mind, we consider that 520 better achieves the benefits discussed above, and therefore support 520 over 520A.

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?*

We agree with the implementation timescales set out in the modification.

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

None identified.

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?*

We are satisfied with the legal text.

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 identified.

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

We do not have anything further to add.