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Dear Mark,

Review of industry code governance

WWU welcomes a review of Code Governance and specifically the role of the UNC Modification Panel and other panels.

Since Network Sales, the UNC modification process has delivered much change in a timely and cost efficient manner – Modification Proposals have been raised and the UNC Modification process has been operated efficiently to ensure Proposals are progressed appropriately. We believe that the UNC Modification process works effectively and would urge that care is taken that the outcome of any Review does not have a detrimental effect.

One issue which has caused concern during the last 2 years is the requirement to develop the UNC to meet changes to GT Licence obligations. Examples of this include DN Interruption Reform (Mod 0090) and Exit Reform (Mod 0116). WWU is concerned that the time constraints imposed by the implementation dates of such Licence changes, whilst ensuring that a deadline is met, may hinder the opportunity to produce fully developed Proposals.

We feel that there are clear benefits from Ofgem engaging in the governance process as early as possible. This would help, for example, by giving the opportunity to clarify at an early stage any questions and issues which Ofgem would wish to see addressed during development. Any information collected would then assist Ofgem in making a considered implementation decision. This early involvement might obviate the need for Ofgem to issue open letters in order to gather additional information at the end of the governance process when interested parties have no further opportunity to respond to new issues raised.

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We look forward to further involvement in the Review. Any questions regarding this response should be addressed to liz.spierling@wwutilities.co.uk.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Bob Westlake', with a stylized flourish at the end.

Bob Westlake
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