

## Consultation Response

# IGT138: Performance Assurance Techniques and Controls

Responses invited by: 24 May 2021

### Respondent Details

Name: Clare Manning

Organisation: E.ON

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

**Please briefly summarise the key reason(s) for your support / opposition**

We are supportive of the modification and its proposed evolution of the performance processes, including the introduction of clearer techniques aligned with the UNC. Unlike the UNC which is evolving the performance process, this modification is introducing a new but equivalent process.

We have raised some points of consideration in relation to the PAFD drafting as part of our UNC response and believe the comments cover both UNC and IGT UNC, including but not limited to, the need for the PAC/PAFA to raise modifications in both codes where required.

## Self-Governance Statement

**Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?**

We agree this modification does require Authority decision, although the modification is pointing to the design of the UNC there are no current assurance provisions in the IGT UNC so this in our view needs to be approved by Ofgem to introduce them into code.

## Please state any new or additional issues that you believe should be considered

No additional/new issues.

## Relevant Objectives

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

We support the rationale provided by the sponsor, the modification mainly supports the settlement process and encourages parties to ensure parties deliver to the targets outlined in the PARR.

## Impacts and Costs

**What development and ongoing costs would you face if this modification was implemented?**

Costs are mainly operational delivery costs; we are unable to provide detailed quantification on this but estimate to be small – medium.

## Implementation

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

We support an implementation which sees UNC/IGT/XRN changes all delivered at a single point of time. The IGT UNC operates on a release basis, unlike the UNC which is more adhoc, and because of this we would recommend a date no earlier than the November release to allow time for the Authority to decide on the proposal and to ensure there is adequate time to deliver training and engagement events as outlined in PAFD.

We recognise that a 6-week window has been written into PAFD and we would see that trigger from the November implementation date.

Where a decision is not made in time for the November release, we would then seek the February 2022 date for implementation.

**Legal Text**

**Are you satisfied that the legal text will deliver the intent of the modification?**

No comments.

**Further Comments**

**Is there anything further you wish to be taken into account?**

No comments.

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**