

**Representation For. 0048**  
"Preparation of Legal Text for Users Modification Proposals"  
Version 1.0

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**Slant:** For  
**Strictly Confidential:** No

**Abstract**

Uniform Network Code Proposal 0048: 'Preparation of Legal Text for Users Modification Proposals'

I refer to the above modification proposal raised by British Gas Trading Limited. It proposes that the Modification Panel be given the right to require the Joint Office to issue Legal Text for Users' proposals when the Draft Modification Report is published. At present, this is done for transporters' proposals only.

Shell Gas Direct (SGD) supports this proposal. We note that the proposal does not require that all Users' proposals have legal text prepared but only those where the Panel considers the preparation of text would improve consultation and improve clarity for all signatories to the Uniform Network Code (UNC), including both Users and transporters.

SGD agrees with the Proposer that this proposal would improve efficiency of the governance process and reduce the potential for unnecessary delays in implementation. SGD considers that the benefits of this increased efficiency and more timely implementation is highly to offset the minor increased costs in producing legal text. We note that Joint Office raises the issue of how costs should be recovered if legal text is provided but the Panel did not recommend implementation and the Proposal was then not implemented. SGD considers that this concern already exists with transporters' proposals some of which have not been supported by the Panel and then not been implemented. We consider that if this is a central cost relating to governance of the UNC and any alternative approach would need to be considered equally for both Users' and transporters' proposals to ensure that there was no undue discrimination.

SGD supports this proposal. We agree with the Proposer that it would further the Relevant Objectives by improving the governance of the Code and efficiency of the process. Increased efficiency in this way should promote efficient competition between shippers and relevant suppliers.

Yours sincerely

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