

## **Review of process for Urgent Modification Proposals**

A paper by BGT for consideration by the Governance Workstream  
15 February 2007

### **Background**

On a number of occasions there has been some concern expressed about the amount of time available for Users to submit representations to Urgent Modification Proposals. The intent of this paper is to stimulate a discussion and formulate best practice guidelines for procedures that are time sensitive/critical. It may also be necessary to consider more rigorous “after the event” review processes where representations of Users may have been compromised.

### **Principles / Issues**

- Wherever possible standard procedures should be adopted with Panel consideration (meeting or teleconference) to compress timescales
- Consultation should never be less than [3] full Business Days
- What is the role of Panel recommendation?
  - Ofgem prefer to receive recommendation
  - Is this time of more value to their decision than affording more time for wider industry responses?
- “What if” there is insufficient time to facilitate consultation?
  - Role of Direction / Consents
  - Materiality of changes proposed
- Role of review procedures

### **Suggested Structure**

#### Best practice Guideline for Urgent Proposals

Following table sets out some potential structures for minimum periods. The fixed option is evident. The tailored option sets fixed periods for tasks such as producing the FMR but then seeks to distribute the remaining available time (prior to the critical date justifying Urgency) [equally] between representations and Ofgem decision.

	Fixed Timescale	Tailored Timescale
Out for representations	[5 days]	Available /3
Producing FMR	(3 days)	[3 days]
[Consult on FMR]	[2 days]	Available /3
Panel consideration	[5 days]	[5 days]
Panel recommendation		
Ofgem decision	[3 days]	Available /3

Grateful for views of the Workstream