

Representation For. 0039
"Removal of 9.5.5 of the Modification Rules"
Version 1.0

Date of Communication: 25/08/2005
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Slant: For
Strictly Confidential: No

Abstract

Modification Proposal 0039 Removal of 9.5.5 of the Modification Rules

I refer to the above modification proposal raised by National Grid Transco - UKT. It proposes that paragraph 9.5.5 of the current Modification Rules is removed and subsequent changes are made.

Shell Gas Direct (SGD) supports this modification proposal. The proposal is in line with discussions at the Governance Workstream and will ensure consistency with the statutory processes on appeals introduced consequentially to the Energy Act 2004. This proposal will ensure that there is no confusion or misunderstandings resulting from any mismatch between Code drafting and legislation. We can see no disadvantages with this proposal, consequences on other obligations and contractual relationships, and do not disagree with the proposer on aspects where views are requested.

We agree with the proposer's view that implementation of this modification would further the Relevant Objectives by promotion of the efficiency administration of the Uniform Network Code.

Yours sincerely

Tanya Morrison
Regulatory Affairs Manager