

Representation For.0078
"Variation/Withdrawal of a Modification Proposal"
Version 1.0

Date of Communication: 02/05/2006
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Slant: For
Strictly Confidential: No

Abstract

Modification Proposal 0078: Variation / Withdrawal of a Modification Proposal.

Thank you for providing SGN with the opportunity to comment on the above Modification Proposal. SGN fully supports the proposal on the basis that it would further the relevant objective specified in Standard Special Condition A11.1 (f) "the promotion of efficiency in the administration of the Network Code and / or Uniform Network Code".

There have been numerous occasions where additional information relating to modification proposals has come to light during the consultation phase, usually following Workstream discussion or consultation. In some cases more appropriate or efficient solutions could have been progressed had the modification process allowed such information to be taken in to consideration and the proposal varied by the Proposer. Unfortunately, the only course of action currently available is to raise a separate Modification Proposal. This can create confusion and is extremely time consuming for all participants. Similarly, there have been occasions where through further discussion and industry debate, it has become apparent to the Proposer that a particular proposal is no longer required or will not deliver the intended result. In such cases the industry would benefit from being able to withdraw such a proposal at the earliest opportunity to avoid unnecessary industry effort and expense.

SGN believes that the above Modification Proposal builds on industry experience and would allow the most efficient course of action to be taken, improving the efficiency of the modification process.

SGN notes that arrangements should only allow the Proposer to vary or withdraw a particular Modification Proposal. We note from legal text provided that this is the intent.

I hope you find these comments helpful.

Regards

Beverley Grubb
Commercial Manager
Scotia Gas Networks