

Representation For. 0084

"Removal of the SME Role from the UNC Modification Rules"
Version 1.0

Date of Communication: 28/07/2006
External Contact: Bali Dohel(Scotia Gas Networks)
Slant: For
Strictly Confidential: No

Abstract

Modification Proposal 084 removal of the SME Role from the UNC Modification Rules.

SGN fully supports the above proposal as we believe this would help promote efficiency in administration of the UNC Modification Rules.

SGN also agrees that the SME input at Draft Modification Report stage is not necessary or an efficient use of resource and that the Work Group Report could form the Draft Modification Report providing it follows the same format and contains the same level of detail. SGN agrees that with the Work Group developing DMR consultation could commence more expediently. However, it should be noted that this may not allow time to develop legal text and we have only just concluded, following implementation of Mod 048. that this was desirable for User as well as Transporter proposals. It is now the default that Transporters prepare legal text for Shipper proposals before they proceed to consultation, as it was felt this would help add clarity to the proposal, ensure a greater and common understanding and result in more efficient consultation. The Panel currently has to actively determine not to require legal text. This proposal assumes the Panel would as default not provide legal text for user proposals and the Panel would actively have to determine that legal text would be required. It is assumed that this would be "rare". SGN does not agree. Also at the last Panel meeting Ofgem reiterated that they prefer legal text.

The current practice whereby SMEs attempt to summarise responses in the FMR do not add any value. SME could be open to criticism of misrepresentation of individuals responses and we, therefore agree that a more appropriate course of action is to provide responses along with FMR. SGN agrees it would be helpful for Transporters to be able to signal to Panel where they are struggling to provide legal text and to develop a process to deal with this.

SGN agree no change to any of the other consultation timescales is required and believes this modification proposal requires minor procedural changes but no system issues, we believe the proposal could be implemented with 1 month of approval.

We hope you find these comments helpful.

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