

Representation

Draft Modification Report

0312 - Introduction of Two-Thirds Majority Voting to the UNC Modification Panel

Consultation close out date: 19 May 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: Association of Electricity Producers

Representative: Julie Cox

Date of Representation: 19 May 2011

Do you support or oppose implementation?

Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

The Association supports this proposal. It would introduce additional checks and balances in the governance processes where we consider there may be insufficient separation of Ofgem's roles, as potentially the initiator of a Significant Code Review and ultimate decision maker for subsequent Code Modifications.

Significant Code Reviews by their very nature consider issues with wide ranging impact across industry parties, so maintaining the option of an appeal under a wider set of circumstances would seem proportionate and appropriate to provide the potential for further scrutiny of proposals which may be contentious in their nature.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The Association considers this modification furthers relevant objectives SSC A11.1 (d) and (f) as described in the Draft Modification Report.

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Version 1.0

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Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

None

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

We can see no reason to delay implementation, so would expect that to occur promptly after a decision is made.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We believe the legal text delivers the intent of the proposal.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.