

## ICoSS response to consultation on Legal Text Guidance Document

The Industrial and Commercial Shippers and Suppliers (ICoSS) group is the trade body representing non-domestic industrial and commercial (I&C) suppliers in the GB energy market. Members collectively supply three-quarters of the gas needs of the non-domestic sector as well as half of the electricity provided by non-domestic independent suppliers<sup>1</sup>.

The UNC process is unique in the gas and power industries in allowing multiple organisations to alter the definitive drafting of the multi-lateral contract that binds its signatories. This results in variability in the quality, responsiveness, turnaround and style of the legal text provided. This has created a perception that the ease of developing a modification depends, in part, on which Transporter is responsible for the legal text. In addition there is a perception that the speed of which the legal text for a change is provided depends on the priority a Transporter may place on the change being progressed. Together these issues highlight concerns that the process is not even-handed.

ICoSS sponsored the development of the current Legal Text Guidance Document to ensure such perceptions do not arise. The document in its current state represents a good start in addressing the issues identified above, but we believe that it can and should go further. The Legal Text Guidance Document should therefore be expanded to require the Transporters to nominate the Joint Office to act as the steward of the UNC, and be responsible for any amendments to its drafting. This will create a clear sense of responsibility and impartiality, not only for any one modification, but also for the whole UNC and ensure a consistent approach to any legal text drafting.

Yours sincerely

