



Joint Office of Gas Transporters
C/o Les Jenkins
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31 Homer Road
Solihull
B91 3LT

7th August, 2015

Response via email only to: enquiries@gasgovernance.co.uk

RWE npower response Consultation on the Legal Text Guidance Document

Dear Les,

RWE npower welcome the opportunity to provide a response to the above consultation on the Legal Text Guidance Document.

RWE npower believe that the way in which legal text is produced should be reviewed. Currently, legal text is produced by gas transporters, a process which is unique to the UNC when compared to other governance arrangements operated within the industry. As such, the content, quality and timeliness of deliver can vary. The Code Administrators have a responsibility under the Code of Practice for Code Administrators (CACoP) to ensure that legal text is produced in a consistent style and that the legal text accurately implements the intent of the Modification, a task made more difficult when different parties will have different approaches to drafting legal text.

We support the intention of a guidance document that attempts to deliver consistency in the production of legal text for all modifications and feel that the document as drafted is a good starting point and will provide an element of standardisation. However, RWE npower's preference would be for independent and centralised production of legal text either by the Joint Office or by a service provider specifically appointed for this purpose. The process would then align the UNC with other industry codes and agreements.

I hope that the information provided above is helpful. Should you have any further questions then please do not hesitate to contact me.

Kindest Regards

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