

Representation

Draft Modification Report

0484S - Guidance for the production of legal text

Consultation close out date: 19 May 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: Scotland & Southern Gas Networks
Representative: Erika Melén
Date of Representation: 19 May 2014

Do you support or oppose implementation?

Qualified Support

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

SGN always endeavour to ensure that accurate legal text is provided in a timely fashion whenever possible working closely with the modification proposer and so support this modification as it sets out further guidance to all parties in relation to legal text production.

The reason for providing qualified support for this modification is that the guidelines set out in the Guidance Document could be abused in certain circumstances, for example in requiring legal representation at workgroup meeting, and we as an industry need to ensure that this does not become commonplace practise where it is not necessary. We also must ensure that legal text is only requested when the modification is fully developed to not waste our legal resources. These issues should be reviewed after the first 12 months should the modification be implemented.

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

No

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

Yes

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the proposer that the modification will further facilitate relevant objective f) in relation to efficiency in the implementation and administration of the Code

Impacts and Costs:

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

GDNs could face additional legal expenses in relation to meeting attendance should this part of the Guidelines be widely used.

Implementation:

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

We are satisfied with the standard self governance timescales for implementation

Legal Text:

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

Yes

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.

No