

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: British Gas Trading
Representative: Andrew Margan
Date of Representation: 16 May 2014
Do you support or oppose implementation?

Support

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

Modification 484S states shippers have expressed concerns about the quality, consistency, impartiality and timeliness of text production. As a generalisation our observation is that Legal Text produced by the Transporters for Transporter modifications, appears to have differing priorities to Legal Text produced for Shippers.

As the Modification points out, Code is silent, as to how Legal Text is produced and therefore the Legal Text Guidance Document should clarify the production of Legal Text and improve these provisions for all parties.

Therefore we are in support of this change.

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

No new or additional issues are identified.

Self Governance Statement:

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

Agree

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe this proposal meets the relevant objective f, promotion of efficiency in the implementation and administration of the Code.

Impacts and Costs:

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

None identified

Implementation:

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Version 1.0

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

No lead time is required

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.

Whilst we are supportive of this change, which drives the creation of a guidance document, we observe that this proposal does not amend the UNC Modification Rules.

Because the guidance document has less authority than Code, we believe this change is reliant on the good will of the Transporters rather than obligating their behaviour through code.

Therefore we are concerned that this proposal will add complexity to the current process and potentially not deliver the expected improvements.