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## **Modification Proposal 0084: Removal of the SME Role from the UNC Modification Rules**

Dear Julian,

Thank you for your invitation seeking representations with respect to the above Modification Proposal.

National Grid (UK Distribution) ("UKD") supports implementation of this Proposal which facilitates removal of the role of the Subject Matter Expert from the UNC Modification Rules.

UKD agrees with the Proposer that if a proposal is sufficiently clear then it is appropriate for the fully developed proposal to form the Draft Modification Report ("DMR"). Where a proposal is referred to a Workstream for further development, and a Workstream Report is subsequently produced, it would aid efficiency for this to be formatted in the style of a DMR and to proceed to consultation as the DMR.

UKD believes it is this emphasis on providing fully developed proposals to the consultation phase that would allow a streamlining of the modification rules and would render the SME role redundant. This emphasis on thorough development in the early stages of the proposal's life cycle should ensure complete and efficient governance procedures are in operation, thus allowing a transporter to meet its obligation to ensure that the UNC is implemented and administered in an efficient manner

We also believe that the associated changes to the modification rules, resulting from a thorough development phase, are appropriate:

UKD agrees with the Proposer that it is appropriate to allow fifteen days for the production of legal text when the Panel requires text to be issued along with the proposal for consultation.

UKD also agrees that on the occasions where a transporter is unable to draft text because the Proposal is not clear, that it may submit a report to the Panel explaining why text can not be produced.

UKD notes that the removal of the requirement to summarise representations allows two days to be saved from the existing process time-line.

Consequently, UKD's view is consistent with the proposer's, in that the streamlining the Modification Process that would result from the implementation of this Modification Proposal would better facilitate the Relevant Objective specified in Standard Special Condition A11.1(f) of a transporter's licence.

Yours sincerely

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