

TRANSCO NETWORK CODE MODIFICATION PROPOSAL No. 0712
"Additional information in Modification Proposals and Modification Reports"
Version 1.0

Date: 08/09/2004

Proposed Implementation Date:

Urgency: Non-Urgent

Justification

The Modification Rules set out the content required in each Modification Proposal and in the Modification Report, both in Draft and Final versions. Presently this information excludes some items that would benefit the community at large and assist in the efficient operation of the Modification process.

Nature of Proposal

To add additional information to the modification proposals and reports.

Purpose of Proposal

This Proposal requires some additional information to be provided when a Modification Proposal is originated and again when Transco prepares the Modification Report in Draft and Final versions.

There are a total of five extra items in the Modification Proposal, three of which are optional for the Proposer to put forward when initiating a Proposal. The “mandatory” items are the Proposer’s justification for a proposal to be dealt with as Urgent and the Proposer’s suggested method of progressing the proposal through the Modification Rules (e.g. to a Workstream or directly to Consultation).

The additional optional items are; the Proposer’s opinion of the impact of the proposal upon Users computer and/or manual systems; any views the Proposer may have concerning implementation timescales; and, suggested legal text.

When preparing the Modification Report in Draft this proposal would require Transco to attach or quote the Modification Proposal in full and to address the additional items within it. In particular, and to give a much clearer idea of the extent of systems changes implied by the Proposal, Transco would be required to outline it’s initial understanding of how the UK Link systems would be impacted (NB this is not intended to be a full systems impact assessment and it is understood that any such initial view would necessarily be subject to later confirmation).

This additional information would assist respondents in coming to a view concerning the proposal and it’s desirability and would therefore encourage participation in the governance processes. It is therefore considered that introduction of this proposal would better facilitate the efficient operation of the Network Code governance

processes and hence Transco's discharge of its licence condition 4D "Conduct of Transportation Business".

Consequence of not making this change

The opportunity to make the Network Code governance process more efficient, transparent and inclusive would be lost. Transco could also continue to be open to criticism of its refusal to provide early indication of systems impacts or any legal text for proposals which it does not actively advocate thereby frustrating, or delaying, implementation of changes which may be of benefit to the wider community.

Area of Network Code Concerned

Section Y,

Amend paragraph 6.2.1 as follows;

(e) if the Proposer considers that the Modification Proposal should be treated as an Urgent Modification Proposal identify the Modification Proposal as such and indicate the Proposers justification for such belief;

add new sub-paragraph (f) the Proposers suggested method of progressing the Modification Proposal through the Modification Rules

renumber current (f) as "(g)" and delete the "and" at the end of the paragraph

renumber current (g) as "(h)"

add new sub-paragraph (i) optionally at the Proposers discretion state the Proposers opinion of the likely impact upon Users computer systems and/or manual processes and procedures;

add new sub-paragraph (j) optionally at the Proposers discretion state the Proposers view of possible implementation timescales, and;

add new sub-paragraph (k) optionally at the Proposers discretion state suggested legal text supplied by the Proposer.

Amend paragraph 7.2.2 as follows;

"the Modification Panel may, without prejudice to paragraph 7.2.3, and notwithstanding that the Proposer may have proposed a different manner of progressing the Modification Proposal determine:"

Amend paragraph 7.3 as follows;

7.3 Circulation of Draft Modification Reports

If the Modification Panel shall determine, pursuant to paragraphs 7.2.2(e) , 7.2.3(c)(i), or 7.2.4(b)(i) that a Modification Proposal or Third Party

Modification Proposal shall be dealt with in accordance with this paragraph 7.3, [or a Modification Proposal that is dealt with pursuant to paragraph 7.2.5 (b)] Transco will within the fifteen (15) Business Days immediately following the date of the meeting at which the determination was made, prepare a Modification Report (in draft) in accordance with paragraphs 8.9.3 or 8.10 (including the text of each Modification provided pursuant to paragraph 6.2.1(k) and/or in respect of which implementation is being recommended) and circulate such draft report, inviting each User, each Third Party Participant and each Non Code Party (if any) to make representations (in such format as Transco shall require) within the fifteen (15) Business Days immediately following the date of that invitation in respect of the report.

Amend paragraph 8.9.3 as follows;

“(a) (i) set out or append the Modification Proposal (or Third Party Modification Proposal) in full and;”

“(a) (ii) the text provided by the Proposer and/or pursuant to paragraph 8.11;”

“(e) outline Transco’s assessment of which parts of the UK Link systems would be likely to be affected and to what extent together with the development implications and other implications for computer systems of Transco and related computer Systems of Users (whether pursuant to the Modification Proposal, representations or otherwise); (not applicable to Third Party Modification Proposals)”

“(n) set out any proposed implementation timescales or comments whether pursuant to representations or otherwise together with a proposed timetable to be followed in respect of the implementation of the Modification (including, but without limitation, the date upon which the Modification should become effective);”

NB Text within [] refers to an additional paragraph (7.2.5(b)) which is assumed to have been implemented by an earlier Modification Proposal.

Proposer's Representative

Steve Ladle (Total Gas and Power Limited)

Proposer

Steve Ladle (Total Gas and Power Limited)

Signature

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