

FGO

MODIFICATION RULES – CONSIDERATIONS

1 Introduction

- 1.1 The purposes of this note is to identify some considerations in relation to the Modification Rules, and the changes required to support FGO.
- 1.2 There are two main areas to consider:
- (a) changes to the existing rules to reflect the role of the CDSP in the modification process (noting the Modification Rules currently make no reference to the Transporters Agency); and
 - (b) the need for new rules (whether in the Modification Rules and/or in the change procedures document) to make clear how a modification to the DSC once made is implemented, i.e. who does what and when (so for instance it is CDSP who implements changes to the DSC?).
- 1.3 In this note we identify possible changes for the purposes of paragraph 1.2(a). We expect to identify changes under paragraph 1.2(b) following further discussions on change control. There is in practice likely to be some overlap between these areas; solutions for 1.2(b) are likely to address several of the issues in 1.2(a). however it is useful at this stage to consider the 1.2(a) issues on their own.

2 The role of the CDSP

- 2.1 As a general observation, the GT licence requirement is that the Transporter will '*...with other relevant transporters, establish and operate procedures for the modification of the uniform network code ...*'. We need to keep this in mind in defining what role the CDSP will have in the modification process, i.e. whether the CDSP can have direct functions, assuming such would not be incompatible with the licence (because it is the Transporters who must have the front line role in the process) or whether the CDSP can only have an agency type role.
- 2.2 We also need to understand some of the information flows in the modification process, e.g. around costs, implementation process and timetable. The current rules make various references to inputs which seem naturally to be CDSP type inputs , e.g. cost estimates, information required to enable cost estimates to be prepared, but these rules seem a little haphazard. Ideally we want clear rules on what information is required from CDSP and at what point in the modification process.
- 2.3 In the context of paragraphs 2.1 and 2.2, some detailed issues for consideration include:
- (a) including a CDSP representative in every Workgroup;
 - (b) for notice of a Modification Panel meetings to be sent automatically to the CDSP and to allow the CDSP representative to attend meetings - and more generally whether the CDSP should receive all notices and reports which are automatically sent to Transporters, Users, Third Party Participants and Non-Code Parties (e.g. paragraphs 6.7.1, 7.1(b), 7.5, 8.4, 9.1.2 and 91.4);

- (c) whether there should be any formal requirement for interaction between the Proposer and the CDSP before the Proposer submits a Modification Proposal;
- (d) whether the content of Modification Proposal should include the Proposer's view on possible impacts on CDSP central systems;
- (e) whether it should be a requirement the CDSP agrees before a Modification Proposal can be treated as Self Governance;
- (f) if the Modification Panel should be obliged to discuss a Modification Proposal with the CDSP before the Modification Panel makes its determination, or at least consider the CDSP's representations in relation to the proposal;
- (g) the role of the CDSP in providing costs estimates and more detailed analysis required for a Modification Proposal (e.g. under paragraphs 7.2.3(c) and 7.2.5);
- (h) assuming there could be direct CDSP functions, what these might be, e.g. submitting the Modification Report, providing cost estimates and other relevant information (see paragraph 7.3(c) and (d)); and
- (i) whether it would be appropriate or not to allow the CDSP to make formal representations in relation to a Modification Proposal.

2.4 In relation to the content of a draft Modification Report it is for consideration whether it would be useful for the report to include a section to be completed by the Code Administrator in consultation with the CDSP. This could allow the report to contain information on the CDSP's views on the impact on CDSP central systems, and perhaps different implementation options, and the associated costs and timetable for different options. The CDSP could also usefully inform the proposals around implementation dates to be included in the Modification Report where the proposal in Self Governance (paragraph 9.4.1(g)).

2.5 The CDSP may need to have a role in relation to Urgent Modification Proposals. Urgency carries with it the implication that any related systems solution can be delivered quickly. It might be that even though the Authority considers a Modification should be given urgent status the systems solution will require time to implement. It is therefore for consideration whether the CDSP should be consulted with as part of the decision making process regarding granting urgent status.

3 User Pays Modification Proposals

3.1 All references to User Pays Modification Proposals and User Pays Implementation Costs will need to be deleted.