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Your Reference 0078

Re: Modification Proposal 0078; Variation/Withdrawal of a Modification Proposal.

Dear Julian,

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

As initiator, National Grid (UK Distribution) supports implementation of this Proposal which facilitates withdrawal or variation of a modification proposal later in the process than is currently permitted. The Proposal was raised with the intention of facilitating a common sense approach to this aspect of the modification process. We believe that the rules in place and those proposed, offer safeguards against virtually all eventualities and prevent a single user having undue control over the transit of a proposal through the modification process.

Where there are not already safeguards in the process new rules have been proposed. The safeguards referred to are:-

- a) a withdrawn proposal may be adopted by another User at the same point in the process ensuring that any developed proposal will proceed to the Authority for direction should any UNC party so desire and;
- b) where a variation request occurs at a very late stage, the proposal will only progress subject to a unanimous vote, otherwise it will be re-consulted upon and/or sent to a workstream for further development.

Consequently, it is our view is that by streamlining the Modification Process, implementation of this Modification Proposal would better facilitate the Relevant Objective specified in Standard Special Condition A11.1 (f), "the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code". The proposal specifically achieves this through achievement of the Relevant Objective specified in Standard Special Condition A11.2 through increasing the flexibility of the mechanism by which the Uniform Network Code may be modified.

National Grid (UK Distribution) also feels that it is appropriate for a proposal to be withdrawn where the proposer's licence is withdrawn or it is terminated under the UNC.

Yours sincerely

Declan McLaughlin
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