

Representation For. 0084
"Removal of the SME Role from the UNC Modification Rules"
Version 1.0

Date of Communication: 18/07/2006
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Slant: Comments
Strictly Confidential: No

Abstract

General

Gemserv supports the removal of the SME role however we have a concern that the requirement in paragraph 6.2.6 (that the Modification Proposal should include additional details taken from the Development Workgroup Report) will prove a higher hurdle for Users than for Transporters and may consequently make it more likely that Transporter proposals could proceed directly to consultation than those of Users.

Detailed Points

It would be helpful, as an aid to clarity, to include new Defined Terms for 'Panel Determination' and 'Suggested Text'.

Paragraph 9.1.1 (a) and (b) would both benefit from putting 'within fifteen (15) Business Days' and 'within three (3) Business Days' respectively, at the start of the clause rather than at the end.

Paragraph 9.6.1 (a) (i) and (b) (i) both contain references to '9.1.1.', in both cases this should be to '9.1.1. (a)'.

Paragraph 9.6.2 refers to 'suggested text of each Modification prepared by the Transporters' being considered by a Workstream (etc). This effectively discards any such text provided by Users under 6.2.1(k) which must be an accidental side-effect of the drafting. It is inappropriate that any User 'suggested text' should not be considered by a Workstream if the Modification Panel decides that the proposal requires further work.