

## **Representation For. 0084**

"Removal of the SME Role from the UNC Modification Rules"  
Version 1.0

**Date of Communication:** 28/07/2006  
**External Contact:** Simon Howe (R W E Npower Plc)  
**Slant:** For  
**Strictly Confidential:** No

### **Abstract**

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Mod 84 " Removal of the SME Role from the UNC Modification Rules"

Dear Julian,

On behalf of RWE npower I would like to thank you for the opportunity to respond on Modification Proposal 84. RWE npower support the implementation of this modification proposal.

We feel that the SME role has served to help the industry's transition into the UNC modification process. We feel that the review of the role is timely as we have found in recent reports the intent of our response has not been truly reflected.

We concur that the provision of legal text should only be drafted once a Modification proposal is 'fixed' and ready for consultation. We consider that legal text should always be provided when a modification proposal is sent to consultation as the text forms the basis of the obligations that Users must adhere to. In past consultations, we have found that whilst we support the principle of the modification proposal we were unable to support the implementation of it due to discrepancies in the legal text.

We agree that the removal of the SME role will help to streamline and reduce the timescales of the UNC Modification process that will bring clear benefits to Users.

We would be happy to discuss any points that you feel need clarification.

Yours sincerely,

Heidi Martin  
Gas Network Codes Analyst