

**Representation For. 0008(0731)**  
"Specific Amendments to the Modification Rules"  
Version 2.0

**Date of Communication:** 04/01/2005  
**External Contact:** Simon Howe (RWE Npower Plc)  
**Slant:** For  
**Strictly Confidential:** No

**Abstract**

Mr Julian Majdanski  
Network Code Development  
NGT House  
First Floor, D3  
Warwick Technology Park  
Gallows Hill  
Warwick  
C34 6DA

January 4th 2005

Modification Proposal 731:

Dear Julian

Thank you for inviting us to comment on this modification proposal. RWE npower supports implementation of modification proposal 731.

We believe that it is important for the Panel to have greater responsibility for the management of the change process regarding obligations between Transporter(s) and Shippers as represented in the Network Code. This proposal goes some way in ensuring that Shippers can play a much more active role in that process.

The ability for a Shipper to be able to modify a proposal during its life cycle will be an important improvement. There have been instances where a mod proposal with a sound concept has struggled because of an inappropriate sentence. The ability to amend a proposal will be an efficient use of all participants time. We are pleased that Transco do not oppose this amendment.

The introduction of clear default positions in the event of a proposal not achieving a Panel Majority will give clarity to Shippers as to the alternatives that are available as to the management of their Mod.

Transco makes an interesting point about the requirement for Workstream Chairmen having to attend even if there have been no meetings between Panel meetings, and perhaps this might be acceptable exception to the Panel. However, the requirement for Workstream Chairmen to attend and give account of and answer questions about the activity at a Workstream would be an important step forward

Yours sincerely

Simon Howe  
Gas Network Codes Manager