

The Joint Office and many members of Workgroup 0621 are concerned about the overlapping and interacting timescales of Modification 0621/A/B/C/D/E/F/G/H/J and other Modifications that are in progress, including Modifications 0636/A/B/C and 0653. The Modification Rules state that a variation request is only possible before the Final Modification Report is submitted to the Authority for decision ([Modification Rules 6.5.1 c](#)).

The concern centres around the situation whereby if Ofgem makes a decision on Modifications 0636/A/B/C after the FMR for Modifications 0621/A/B/C/D/E/F/G/H/J has been submitted, there is no defined process to vary Modifications 0621/A/B/C/D/E/F/G/H/J to recognise the Ofgem decision on Modifications 0636/A/B/C.

We seek your views on how this can best be handled.

For further background information we refer you to the Energy UK presentation ([link](#)) and minutes of Workgroup 0621 meetings on 20 March 2018 and 28 March 2018.