



Modification rules

## **Best Practice Guidelines Document**

Prepared by Review Group iGTRP001, February 2008

## ***Background***

iGT UNC was implemented in May 2007 after an exercise in the consolidation of existing iGT network codes. Part L of the iGT UNC sets out the code modification rules, governing how parties make changes to the iGT UNC or the individual network codes of the iGTs.

Any modification proposal raised is assessed by Modification Panel as to whether or not the intent of the proposal is sufficiently clear for the proposal to proceed to consultation. During the consultation process the views of interested parties are sought. These are then collated and passed with the original proposal to the Authority, who, based on a number of criteria set down by licence, decide whether to approve the proposed change for implementation.

The iGT UNC modification process is administered by Gemserv ('The Representative'). They can be contacted at [iGT-UNC@gemserv.com](mailto:iGT-UNC@gemserv.com) if you wish to submit a modification proposal, or require help or advice in relation to iGT UNC.

The term Authority refers to the Gas and Electricity Markets Authority, which receives and directs modification proposals on iGT network codes and the iGT UNC. In practice, much of this work is carried out by Ofgem (the Office of Gas and Electricity Markets), and the two are often used interchangeably. For consistency, 'Authority' has been used throughout this document.

## ***Scope and purpose of this document***

It is recognised that the business of the Modification Panel is facilitated by clearly written modification proposals. The modification rules (L 9.5) contemplate a best practice document issued by the Panel to give further guidance around the framework that those rules provide. This document is not however intended to be a complete guide to the modification rules themselves, rather it should be used in conjunction with the iGT UNC, which gives full details of the process and timings of the various stages of code modification. These Best Practice Guidelines should be considered a point of reference for all parties intending to raise, read, or respond to modification proposals to the iGT UNC or associated iGT network codes.

This document has been agreed and issued by the iGT UNC Modification Panel, and changes to it may be made by agreement of the Modification Panel.

## ***What is a modification proposal?***

The iGT UNC defines a **Modification Proposal** as:

a proposal for the modification of the iGT UNC or an Individual Network Code pursuant to the Modification Rules

It also specifies what a **Modification Proposal** should contain:

A Modification Proposal must

- (a) specify whether it relates to the iGT UNC or an Individual Network Code;

- (b) set out in adequate detail a description of the problem which the Modification Proposal is intended to address and a description of the nature of the Modification Proposal;
- (c) set out the basis upon which the Proposer considers that it would better facilitate the achievement of the Relevant Objectives;
- (d) if the Proposer considers that the Modification Proposal should be treated as an Urgent Modification Proposal, identify the Modification Proposal as such and indicate the Proposer's justification for such belief;
- (e) state the name of the Proposer and the Proposer's representative.

### ***Who can raise a modification proposal?***

The iGT UNC specifies those parties that can propose amendments to it, and to the individual network codes of the iGTs. In the majority of cases, it is either the Pipeline Operator (iGT) or a Pipeline User (shipper) that can raise proposals to change the relevant Code. It is worth pointing out that without being signatory to a network code, you may not raise a modification to it. For this reason, an iGT is not able to propose modifications to another iGT's individual network code, since they are not a Code Party in this case. Equally, a shipper may not be signatory to every iGT's network code. However, since all iGT network codes incorporate the iGT UNC, any party to an iGT network code is permitted to propose a modification to the iGT UNC.

There is a further category able to propose changes to the iGT UNC, referred to as 'Third Party Participants', (which in practice means Energywatch or equivalent consumer representation body). However, modification by Third Party Participants is limited to a certain number of operational data items, as listed in Appendix K-1 of iGT UNC.

### ***The modification proposal***

This is the document that should set out clearly how the Code will be modified, and what benefit this will bring. It should be sent to the Representative, who will ensure it is correctly formatted and then publish it. It will be assessed initially by the Modification Panel, who decide whether it should proceed to consultation, not on the basis of whether they agree with the principle of the modification, but whether the proposal is sufficiently clear to allow interested parties to respond without having to seek further clarity. A template exists to encourage clearly written proposals (see Appendix 1).

### ***Alternative modification proposals***

A code party may support the principle of a proposed modification, but disagree on the exact details. In this case, it is more efficient to raise an alternative to the existing modification, than make a brand new proposal. This must be done within five days of the original proposal being issued for consultation.

The purpose of raising a modification as an alternative, rather than entirely separately, is that the original modification and its alternative will proceed through the consultation process together, and so the merits of each will be considered side-by-side by the Panel and the Authority.

## ***Variations to modification proposals***

A proposer may, at any time before the publication of the Final Modification Report, vary their modification proposal. This is often done to add further clarity, or correct inconsistencies or errors, following comments received during consultation. If they do so, the Panel must consider whether it considers such variation to be 'material'. If not, the proposal continues as normal in its varied form. If however, the Panel does consider that the variation has a material bearing on the intention of the proposal, the varied modification will be re-issued in its varied form, beginning the consultation process from the start. Parties should be mindful of this process and attempt to avoid variations during consultation due to inconsistencies or errors, in order to limit the administrative burden on the Representative and the Panel.

## ***Modification proposal template***

A Modification Proposal template has been created which follows and expands on the criteria for modification proposals set out by the iGT UNC (see Appendix 1). These Best Practice Guidelines provide additional information to ensure that every modification proposal that is raised is, with the help of the template, sufficiently clear to go to consultation. The importance of an informative modification proposal, setting out the exact intent of the proposal along with details of how the proposal would better facilitate the relevant code objectives, should not be underestimated as a fundamental part of the decision-making process for both industry participants and the Authority.

The following notes are to be read in conjunction with the Modification proposal template in Appendix 1:

**Date:** date the proposal is submitted to the Representative

**Urgency:** whether not the proposer wishes that the proposal should be granted urgent status. If urgent, see section on urgency later in this document

**Reference:** The next sequential reference number for the network code in question – allocated by the Representative

**Status:** The proposer should indicate whether they wish the proposal to proceed directly to consultation, or to development. The Panel will take this into account when making their decision. If the proposer feels that certain specific elements of the proposal would merit further industry discussion and/or agreement before the consultation stage, then they should recommend the proposal for development. It is worth noting that the Panel may also send a proposal for development, (sometimes despite a proposer's recommendation for consultation) if the proposal is deemed to require further work.

Upon submission of a Final Modification Report to the Authority, the term 'Status' is used to record whether or not the Panel recommends the modification for approval.

**Title:** A short descriptive title for the modification proposal, used for swift recognition of the proposed change

**Proposer/Proposer's representative:** Since a proposal can only be raised by a Code Party, this should be the name of the organisation proposing the change. The name of the

individual taking responsibility for the modification should be stated as Proposer's representative. Note, this does not have to be a direct employee of the Proposer, but in most cases will be. It is expected that this individual will be the point of contact for any queries other parties/the Representative may have relating to the modification.

**iGT UNC/Pipeline Operator Code:** The proposer should state which network code is intended to be modified. If it is an individual network code, there is space to specify which code(s) this should be.

**Proposed implementation date:** iGT UNC defines minimum lead times for the implementation of particular types of modification. These lead times are:

- (a) two months after the date of direction or consent by the Authority, for changes to documentation only;
- (b) four months after the date of direction or consent by the Authority, for changes that involve operational changes;
- (c) six months after the date of direction or consent by the Authority, in all other cases.

Implementation should also be aligned with three annual releases (updates) to Code, in February, June and November, which helps all Parties to schedule systems releases etc.

Because it is not known how long the Authority will require to make a decision after receiving a Final Modification Report, the Proposer is not in a position to specify an exact date for the implementation of their modification. However, they can certainly specify which of the above categories they believe the modification falls into. There may also be a case for an implementation date that does not fall into the above categories (they are only minimum guidelines), for example a major change to IT systems for which an extended development time will be necessary. In such cases, the Proposer should choose 'Other' and provide further comments.

Knowledge of the implementation lead times, and the annual release schedule should allow a Proposer to plan submission of their modification accordingly. If there is an imminent date-related event, there may be a case for submitting an urgent modification (see guidelines on urgency below).

This Proposer's date preference should be commented on during consultation, and will be taken into account by the Modification Panel which makes the final decision on the implementation date. The agreed implementation date is included in the FMR sent to the Authority.

**Proposed implementation technique:** Most modifications would be implemented as a 'Big Bang', i.e. the change affects all parties on particular date. However, there is an option for the Proposer to state a preference for a 'phased' implementation. All parties would still be obliged to effect the change, however, typically, this would allow for each party to negotiate their own implementation date. This implementation technique may be preferred if, for example, the Proposer is aware that some Parties may be able to/prefer to implement a change sooner rather than later, but others will have difficulty in doing so. If it is not crucial that all Parties implement at the same time, this can increase the chances that a modification will gain full support by all Parties.

**Modification proposal dates:** These key dates will be allocated by the Representative according to a set timetable. The Representative has no control over how long the

Authority may take to reach a decision, and so only those dates which are fixed are recorded here. However, the field 'Suggested implementation date' provides a rough guide as to when the proposal could be implemented, based on the Proposed implementation date/timescales, and an estimation of how long the Authority would need to approve the modification. (See section on Proposed implementation date.)

**Urgency:** The proposer should justify any request for urgency here, based on the guideline criteria outlined later in this document.

**Background:** It is often useful to explain the context within which the proposal sits. This section should be used to provide a summary of the area where the perceived problem lies, any previous work in the area, how the proposal has been developed.

**The Proposal:** This section should explain in detail the exact intention of the Proposal, the problem it is addressing, and how it solves that problem.

**How will the Proposal operate?:** This section should give details of the exact changes that will be required to the relevant network code in order for the modification to take effect. The Proposer should state which Part and Clause are affected and how they would be amended. (There is a further section on the template to provide an actual suggestion for new legal text.)

The Representative will be able to provide advice on completing this section, but it may be that if the Proposer is having difficulty providing these details, the modification is not sufficiently developed, and requires further thought or development.

**Facilitation of relevant objectives:** This is perhaps the most crucial part of the proposal since it is against these criteria that the Authority decides whether to approve the modification. The Proposer must comment on the way in which the change would better facilitate the 'relevant objectives' as compared to the status quo. The 'relevant objectives' as listed in Standard Condition 9 of the Gas Transporter licence, are:

- the co-ordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters;
- the efficient discharge of the licensee's obligations under this licence;
- the securing of effective competition between relevant shippers and between relevant suppliers;
- the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards (within the meaning of paragraph 4 of standard condition 32A (Security of Supply – Domestic Customers) of the standard conditions of Gas Suppliers' licences) are satisfied as respects the availability of gas to their domestic customers;
- the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition.

Note: these objectives have been reproduced on the modification proposal template itself, as they have a crucial bearing on all modification activity and should be borne in mind at all times.

A well written proposal should not only state which of the relevant objectives is facilitated, but also give specific examples in relation to the area that the proposal relates to. In other

words, the proposer should clearly demonstrate how the relevant objectives are facilitated, instead of leaving the Modification Panel – and the Authority – to draw their own conclusions.

Importantly, it is good practice to comment on **each of the relevant objectives in turn**. If it is not foreseen that the modification would facilitate a particular objective, this should be stated in the proposal/response. Alternatively, a proposal may further one objective yet weaken another. There is a recognised 'hierarchy' of objectives (i.e. the order in which they are written), and a comment against each of them allows the Authority and other parties to weigh up the impact on the objectives as a whole.

**Comment [DS1]:** It may be worth giving a heading for each objective on the proposal template, and a space below to provide comment.

**Impacts on other industry codes/agreements/contracts:** This section promotes early consideration of the way in which a modification may affect other codes or agreements, for example CSEP NExA. The Proposer should try to indicate these impacts, but it is recognised that additional impacts may be identified during consultation.

**Impacts on systems/processes:** Clearly, the Proposer will not be in a position to understand the full impact on all Parties' systems and processes. In this section they should indicate what they believe may be the extent of such impacts, thus providing a basis to which interested parties should respond during consultation. This existence of this section is intended to promote early consideration of systems impacts which are often overlooked until a very late stage of the modification.

**Suggested legal text:** There is an obligation on the pipeline operator(s) to procure legal text should the Panel deem it necessary, and because of this, proposers are often reluctant to provide text at the proposal stage. However, it is worth emphasising that at this stage, suggested legal text is very useful to parties trying to understand the purpose of a modification. It should also be recognised that there is plenty of opportunity to amend this text, and in most cases a final version will be produced (on behalf of the Operators) before the Final Modification Report is provided to the Authority. A very good guide to whether or not a proposal is complete is to question whether legal drafting can be produced to reflect the intention of the modification. If the answer is no, further thought may need to be given to redrafting the modification, or development of the principle behind it.

## ***Responding to consultation***

Once the Panel has agreed that a modification should proceed to consultation, the Representative will publish it and any interested party may submit comments on it. A consultation response template exists (See Appendix), the most important parts of which allow the Representative to collate a final modification report to be sent to the Authority. Use of this template is strongly encouraged (however, responses will be accepted in any format).

Parties may wish to respond to a modification proposal during its initial consultation stage, or in the period following the publication of the Draft Modification Report. There is nothing stopping a party responding at both stages, and in many instances it may be advantageous to do so. A good example of how parties may wish to take advantage of the two-stage consultation is as follows:

- A response at the initial stage could validly be used to give qualified support to a proposal, i.e. support for the intent of the modification, pending full details given by the proposed legal text.
- A response to the DMR could then firm up that support, and provide comment on the proposed legal text. Comments on the legal text are very important, since this is ultimately how the code will change, and unless the legal text accurately reflects the actual (or perceived) intent of the modification, the change process has failed. A response at this second stage also gives the opportunity to comment on representations made by others.

The response template should be completed as follows:

**Date:** The date of the response.

**Reference:** Provide the reference number of the modification. There is also a dropdown box to indicate whether you are responding to the original consultation document or the Draft Modification Report. A party may respond at either stage, or both. Responses to consultation are encouraged if possible, with responses to DMR more often used when further information has come to light since the consultation response was made, or the proposal has been varied slightly. Indeed, a party may change its support of the modification from one stage to the next.

**Title:** Enter the title of the modification

**Respondee:** Name of the person submitting the response, and company if applicable.

**Position on modification:** The respondee should indicate whether they support or reject the modification. Further to this, they are asked to indicate their support for the proposed implementation date and technique.

**Facilitation of the relevant objectives:** The respondee should comment on whether and how they believe the relevant objectives are facilitated. They may choose to respond directly to the assertions made by the Proposer of the modification.

Importantly, it is good practice to comment on **each of the relevant objectives in turn**. If it is not foreseen that the modification would facilitate a particular objective, this should be stated in the proposal/response. Alternatively, a proposal may further one objective yet weaken another. There is a recognised 'hierarchy' of objectives (i.e. the order in which they are written), and a comment against each of them allows the Authority and other parties to weigh up the impact on the objectives as a whole.

**Impacts on other Industry Codes/Agreements/Contracts:** Any perceived impact on other industry codes and agreements should be identified here, or comment made on this section of the modification proposal.

**Impacts on Systems/Processes:** As much detail as possible should be given as to the perceived impacts on the respondee's own systems and processes (if applicable). For example, if the perceived impact is high, and this is a reason for rejecting the modification, then the response should include a full explanation of this, possibly including indicative costs. More evidence will allow the Authority to come to a more considered judgement on whether to approve a modification.

**Comments:** A general response to the modification can be provided here. If it is felt necessary that the positions given above require justification or further explanation, then this information should be given. For example, a respondee who does not support implementation date may wish to explain why they do not support that date, and give a date that is acceptable to them. This will be taken into account by the Modification Panel when they agree an implementation date for the FMR. A respondee may also wish to comment on other responses that have been made, or suggest changes to the Proposer may wish to consider, among other things.

Parties are encouraged to respond to as often as possible to modification proposals. The Authority cannot infer support or otherwise from a lack of response. A short response to even the least contentious modification proposal may lead to variation of (improvement upon) that proposal, or discussion of issues that had not been contemplated by the proposer. This serves the good of the industry as a whole, and leads to efficient code governance.

### ***Draft Modification Report***

The Draft Modification report is produced by the Representative and published for the attention of interested parties. The Report is a summary of the modification proposal and representations made to the consultation. There is an opportunity to respond to the DMR, since parties may wish to comment further on any changes that may have been made to the modification since it was first proposed. They may also wish to make further representation, having reconsidered their position in light of representations made by others, or changed circumstances.

The basic content of the Draft Modification Report is determined by the modification rules, but the Panel may request by agreement that additional information is contained within it at any time.

### ***Final Modification Report***

The Final Modification Report is a document produced by the Representative which provides a summary of responses at all stages of consultation, setting out those parties which responded and whether they support or reject the proposal. The Final Modification Report is submitted to the Authority and forms the basis of their decision on a modification to iGT UNC. This document is not intended as a detailed summary of the actual representations made. It is acknowledged that summarizing the views of others is unnecessary and can lead to viewpoints being unintentionally misconstrued; therefore no attempt is made to do this, particularly in light of the fact that the Authority reads each response in full.

The FMR does however contain a brief consolidated view of the Pipeline Operators (if possible), since the report is written on their behalf, and the modification is to their code. Further, it states the determination of the Panel as to whether it thinks the modification should be implemented or not, and gives the Panel's indication of implementation timescales. While the contents of the FMR are taken into account reaching an approval or rejection decision, the Authority are under no obligation to endorse the recommendation of the Panel.

It is worth noting that even if you have missed the response deadlines laid down by the modification rules, the Authority will accept and consider representations at any stage of

the process. Responses received by the Representative will not be included in the relevant report for the Panel, but you should ensure that the Authority are aware of your viewpoint if you consider it to be important.

The basic content of the Draft Modification Report is determined by the modification rules, but the Panel may request by agreement that additional information is contained within it at any time.

### ***The decision of the Authority***

It is difficult for the Authority to commit to deadlines for making decisions on modification proposals due to the varied nature of proposals, and the need to give full consideration to all aspects of the Final Modification Report. However, as a guide, the Authority seeks to make a decision within six weeks of receipt of the FMR in 75% of cases. This information should allow a proposer to make a reasonable estimate of when a proposal may be implemented, and so plan its submission accordingly.

### ***Consent to modify***

The majority of modification proposals should be processed via the standard modification procedures, as described throughout this document. This allows all interested parties to give the proposal due consideration and provides an opportunity for representations to be made.

However, there is an alternative method of amendment under which some proposals can be considered. The Consent to Modify route could be almost appropriately used for the following types of amendments:

- Removal of obsolete terms and references
- Amendments of typographical error
- Any change which does not alter the material content or intent of the Code.

The Consent to Modify process allows the kind of amendments detailed above to bypass the standard procedures, thus reducing the administrative burden on relevant parties to raise, respond to and make decisions on proposals with immaterial consequence. This route also allows changes such as this to be made within shortened timescales.

For guidance on whether or not a proposal could appropriately be dealt with via Consent to Modify, contact the Representative, or the Authority.

### ***Urgency***

It is the Authority's view that in order for a modification to be granted urgent status, it should exhibit at least one of the following characteristics:

- There is a very real likelihood of significant commercial impact upon operators, users or customers if a proposed modification is not urgent;
- The safety and security of the network is likely to be impacted if a proposed modification is not urgent, and;

- The proposal is linked to an imminent date-related event<sup>1</sup>.

It should be noted that although the criteria above should be considered as general conditions, there are no set rules, and each proposal will be considered on an individual (but consistent) basis by the Authority.

It is important that when a modification proposal seeks urgent status, there is specific rationale that such a proposal fulfils one of the above characteristics and the proposer is able to explain in some detail why the proposal must be treated under urgent timescales. Without this explanation, urgent status can be rejected by the Authority and the proposal would proceed (if not withdrawn) according to the standard timetable. Therefore, if a proposal does require urgency, it is vitally important that there is full justification for it doing so.

Upon urgent status being granted, it is for the Authority and the Operators (iGTs) to agree the specific timescale the proposal must follow.

Third parties are not permitted to raise urgent modification proposals.

### ***Review proposals***

A review proposal identifies an area of network code which the proposer believes merits collaborative investigation by industry parties. The Proposer may have an idea of a potential modification but believes there may be several ways of approaching the problem, or that there are number of related elements that require discussion before the modification stage can be reached.

If the Panel accepts a review proposal, a dedicated review group is formed, and the Panel assigns timescales to the work. A review proposal will result in a report to the Panel by the review group. It may also result in one or more modifications, but this does not have to be the case.

Appendix 3 shows a review proposal template, which should be filled in as follows:

**Date:** Enter date of proposal.

**Reference:** This reference number will be allocated by the Representative.

**Title:** Enter a short descriptive title for the review proposal.

**Proposer/Proposer's representative:** The proposer should be a Code Party i.e. a company. The name of the individual taking responsibility for the modification should be stated as Proposer's representative. Note, this does not have to be a direct employee of the Proposer, but in most cases will be. It is expected that this individual will be the point of contact for any queries other parties/the Representative may have relating to the modification.

**iGT UNC/Pipeline operator code:** The proposer should state which network code is intended to be modified. If it is an individual network code, there is space to specify which code(s) this should be.

---

<sup>1</sup> The Authority open letter of 2000

**Affected section of code:** A review proposal must relate to a specific section of network code, and so should not be used to launch a review of an area unrelated to code. The proposer should specify which area (clause or clauses; part or parts) of the network code the review will encompass. This scope may be expanded or limited when the Terms of Reference for the review group are established.

**The Proposal:** Enter full details of the review proposal here. This section should be used to justify the requirement for industry resource to investigate the area in question, since the Panel must be convinced of this when they accept a review proposal.

Also note that there are several routes for the commencement of a review, the first of which involves a Code Party submitting a review proposal as detailed above. Further to this, a review may be instigated by the Panel at any time by agreement. Lastly, any modification proposal can be sent by the Panel for review, for example if it is felt that the potential scope of the modification is very broad, or that there are other related elements that require consideration alongside the modification that have been overlooked by the proposer.

## Appendix 1: Modification proposal template

<b>Date</b>	Enter date
<b>Urgency</b>	Non-urgent
<b>Reference</b>	To be allocated by the iGT UNC Representative
<b>Status</b>	For consultation
<b>Title</b>	The Proposer should give each modification proposal a short title which clearly reflects the intent/content of the proposal
<b>Proposer</b> <b>Proposer's representative</b>	Name of Code Party Name of individual
<b>iGT UNC / Pipeline Operator code</b> <i>Confirm whether the Modification Proposal is to the iGT UNC or an iGT's Individual Network Code</i>	iGT UNC
<b>Proposed implementation date</b> <i>See iGT UNC for guidelines on implementation timescales</i>	(a) two months after the date of direction or consent by the Authority, for changes, in accordance with planned release schedules (February; June; November) OR Other: Enter comments if required
<b>Proposed implementation technique</b>	"Big bang" Comments: Enter comments if required
<b>Modification proposal dates</b> <i>Completed by the Representative</i>	<i>Circulation: dd/mm/yyyy</i> <i>Response: dd/mm/yyyy</i> <i>Circulation of DMR: dd/mm/yyyy</i> <i>Response to DMR: dd/mm/yyyy</i> <i>FMR sent to the Authority: dd/mm/yyyy</i>
<b>Urgency</b> <i>If the modification is urgent, please provide justification here.</i>  Not applicable	
<b>Background</b> <i>This section should explain the context of the proposal and give any relevant background information.</i>  Enter text here	

## The proposal

*Purpose of the proposal – what problem is it addressing?*

Enter text here

## How will the proposal operate?

*This section should explain, specifically, how the proposal will change the operation of the Network Code.*

Enter text here

## Facilitation of the relevant objectives

*How this proposal will, if implemented, better facilitate the “code relevant objectives”, as defined in Condition 9 of the Gas Transporters Licence. These are provided below for reference:*

- (a) the co-ordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters;*
- (b) the efficient discharge of the licensee's obligations under this licence;*
- (c) the securing of effective competition between relevant shippers and between relevant suppliers;*
- (d) the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards (within the meaning of paragraph 4 of standard condition 32A (Security of Supply – Domestic Customers) of the standard conditions of Gas Suppliers' licences) are satisfied as respects the availability of gas to their domestic customers;*
- (e) the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.*

Enter text here

## Impacts on other industry codes/agreements/contracts

*The consequences of implementing the Modification Proposal on other Industry Agreements/Contracts etc.*

Enter text here

## Impacts on systems/processes

*The consequences of implementing the Modification Proposal on systems and processes of Operators, Users, or others.*

Enter text here

## Suggested text

*Wherever possible, a proposal should contain suggested text or detail the key elements required to be reflected within the legal text if the proposal were implemented.*

Enter text here

**Appendix 2: Consultation/Draft Modification Report response**

<b>Date</b>	Enter date	
<b>Reference</b>	Reference number Draft Modification Report	
<b>Title</b>	The Proposer should give each modification proposal a short title which clearly reflects the intent/content of the proposal	
<b>Respondee</b>	Name of Interested Party	
<b>Position on modification</b> <i>Completed by the Representative</i>	Proposal: Implementation date: Implementation technique:	Support Support Support
<p><b>Comments on above position</b></p> <p><i>Please provide further comments on the position stated above, if necessary.</i></p> <p>Enter text here</p>		
<p><b>Facilitation of the relevant objectives</b></p> <p><i>How this proposal will, if implemented, better facilitate the "code relevant objectives", as defined in Condition 9 of the Gas Transporters Licence.</i></p> <p>Enter text here</p>		
<p><b>Impacts on other Industry Codes/Agreements/Contracts</b></p> <p><i>The consequences of implementing the Modification Proposal on other Industry Agreements/Contracts etc.</i></p> <p>Enter text here</p>		
<p><b>Impacts on Systems/Processes</b></p> <p><i>The consequences of implementing the Modification Proposal on systems and processes of Operators, Users, or others.</i></p> <p>Enter text here</p>		
<p><b>Other additional comments</b></p> <p>Enter text here</p>		

**Appendix 3: Review proposal template**

<b>Date</b>	Enter date
<b>Reference</b>	To be allocated by the iGT UNC Representative
<b>Title</b>	The Proposer should give each modification proposal a short title which clearly reflects the intent/content of the proposal
<b>Proposer</b> <b>Proposer's representative</b>	Name of Code Party Name of individual
<b>iGT UNC/Pipeline operator code</b> <i>Confirm whether the Review proposal is to the iGT UNC or an iGT's Individual Network Code</i>	iGT UNC
<b>Affected section of code</b>	Enter text here
<b>The proposal</b> <i>This section should explain the context within which the proposal sits and some background information and explain the purpose of the Review</i>  Enter text here	