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Consultation Response

iGT089: Revision to the Modification Rules in Response to CGR 3 – Self Governance

Responses invited by: 14 October 2016

Respondent Details

Name: Laura Cahill

Organisation: SSE Supply

Support Implementation	☐ YES
Qualified Support	☐
Neutral	☐
Do Not Support	☐

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Please briefly summarise the key reason(s) for your support / opposition

SSE supports implementation of this Modification, as it will change the presumption towards Self Governance and away from Authority Consent, thereby improving the efficiency of the Code.

SSE agrees with the CGR3 review decision that the general rule for all Industry Codes is that the default for any modification proposal should now be Self Governance and views this as an improvement to the current modification rules.

SSE agrees with the Review Group's position that this process is generally more efficient in that it eliminates the need for a delay in potential implementation whilst a Final Modification Report is sent to the Authority for its decision on whether the proposal should be implemented. It further agrees with the safeguard being that where a party believes that the modification incorrectly followed the self-governance route, it can still appeal the Panel decision.

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Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

We agree with the Workgroup's recommendation that this Modification meets the criteria for self-governance.

Please state any new or additional issues that you believe should be considered

None identified.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree that this Modification will positively impact on relevant objective (f), i.e. promotion of efficiency in the implementation and administration of the Code.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

None identified.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

An implementation date of 24th February 2017 has been suggested as appropriate and we are in agreement with this suggestion.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

Yes.

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Further Comments

Is there anything further you wish to be taken into account?

No thank you.

Responses should be submitted by email to iGTUNC@gemserv.com

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