



SPAA Ltd.  
Ground Floor  
Grafton House  
2 - 3 Golden Square  
London W1F 9HR

Tel: 020 7432 3005  
Fax: 020 7432 3015  
[www.spaa.co.uk](http://www.spaa.co.uk)

**Dora Ianora**

Manager Industry Codes and Licensing  
Ofgem  
9 Millbank  
London  
SW1P 3GE

By email: [Dora.Ianora@ofgem.gov.uk](mailto:Dora.Ianora@ofgem.gov.uk)

07 April 2011

Dear Dora,

**Re. Open letter consultation on Code Modification Urgency Criteria**

I am writing on behalf of the SPAA Executive Committee (EC) in response to Ofgem's consultation on criteria it expects to use when asked to consider whether a code modification proposal should be treated as urgent.

Under the SPAA, the EC has the authority to decide whether modification proposals should be considered as urgent but the Agreement does not currently specify any urgency criteria. The EC therefore welcomes Ofgem's Consultation to determine such criteria and looks forward to receiving the final outcome of the consultation, which the EC propose to incorporate into its change guidance notes.

Having considered the proposed guidance in making a decision on the urgency status, the EC is broadly supportive of the criteria Ofgem has suggested for making such decisions. However, under the current proposals there is no provision which prevents dilatory modification proposals being considered as urgent. The EC believes that modification proposals, which would otherwise be 'standard' proposals but have not been raised in a timely manner, should not automatically be granted urgent status. The EC proposes that the Authority considers how the issue can be addressed as part of its assessment.

Should you require any further information please contact me directly on 020 7432 3017.

Yours Sincerely,

*Charm*

**Elizabeth Lawlor**  
**EC Secretary**