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## Draft Rule Change Report RC\_2009\_33 Provision of Information to the IMO

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### Submitted by

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### Submission

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#### 1. Please provide your views on the proposal, including any objections or suggested revisions

Having originally supported the proposed rule change, LGP accepts in good faith the IMO's decision not to proceed with it on the grounds that it effectively seeks to shorten the gate closure from 12 months to 15 days and would inappropriately diminish the integrity of the settlement process with respect to the accuracy of data provided. That said, we consider that the integrity of the settlement process would be improved by requiring known-errors to be corrected in time for the first settlement run, especially where a party that has committed a rule breach via late delivery of data stands to benefit from submission of the data. We also consider that that the referenced discussions between System Management and the IMO would ideally have arrived at a compromise solution rather than rejection of the proposal.