

## Representation - Draft Modification Report UNC 0735S

### UNC Changes as a consequence of the absence of trade agreement/s between the United Kingdom and the European Union ('no deal')

Responses invited by: **5pm on 10 December 2020**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Claire Roberts
<b>Organisation:</b>	ScottishPower
<b>Date of Representation:</b>	10 <sup>th</sup> December
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>f)</b> Positive

#### Reason for support: Please summarise (in one paragraph) the key reason(s)

SP supports implementation of this modification. This change seeks to make minor document changes to the Uniform Network Code (UNC) where there is reference to EU regulations and EU entities.

The amendments to the UNC documents will ensure they are consistent with the UK amendments and regulations, in the absence of no trade agreement post the implementation period.

#### Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree that this modification should be subject to self-governance procedures, this is primarily a document change to update references to EU regulations and EU entities within UNC.

#### Implementation: *What lead-time do you wish to see prior to implementation and why?*

No lead time would be required, implementation could be as soon as a decision has been made by Panel in the event on a "no trade" deal being made.

#### Impacts and Costs: *What analysis, development and ongoing costs would you face?*

We have not identified any development or ongoing costs as a result of this change.

#### Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

We are satisfied the legal text will deliver the intent of the modification solution.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

No further comments.

**Please provide below any additional analysis or information to support your representation**

No further comments.