

Representation - Draft Modification Report UNC 0680S

UNC Changes as a Consequence of 'no deal' United Kingdom Exit from the European Union

Responses invited by: **5pm on 11 April 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	8 th April 2019
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

We support this modification, which is required in the event of a “no deal” BREXIT, as it makes the necessary changes to the UNC. It will remove references to the EU that will be redundant and makes clear that enacted provisions of EU law apply through being incorporated into UK legislation. We note that most of the changes are to the European Interconnector Document. We agree that making this change will further relevant objective (f) Promotion of efficiency in the implementation and administration of the Code.

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

We support self-governance as it satisfies the self-governance criteria. We note that at the March UNC modification panel Ofgem stated that they would “call in” this proposal to ensure that implementation was coordinated across codes.

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

This will be directed by Ofgem.

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

None

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

Yes

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.*

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