

## Representation - Draft Modification Report UNC 0760

### Introducing the concept of a derogation framework into Uniform Network Code (UNC)

Responses invited by: **5pm on 20 September 2021**

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 Louise Roberts
<b>Organisation:</b>	ScottishPower
<b>Date of Representation:</b>	20 September 2021
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>c)</b> Positive <b>f)</b> Positive

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

ScottishPower agrees with the principle of the modification and what it seeks to achieve. This is a good idea to promote innovative developments and the modification would align the UNC with the BSC sand-box arrangements.

However, clarity will be needed on exactly what derogations are being requested and tight controls in place to avoid any adverse impacts to UNC Parties (e.g. system, process, file formats, reporting, cost etc).

Each application should be considered on its own merits, there should only be one application for any particular proposal, to ensure there is no duplication of the same derogation.

There needs to be clear time limits on each application depending on the merits and risk of the application being made. Clearly defined reporting requirements need to be in place prior to any proposal being approved and the right for UNCC to make recommendation conditional on a variation of the applicants requested derogations.

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

ScottishPower agrees implementation could be as soon as the authority make their decision. IGT UNC 154 is following a similar timetable to UNC 0760, to keep both modifications aligned, it would be good if the authority could consider them together.

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

We are unable to quantify or identify any impacts at this stage. As we move towards Net Zero this type of request is anticipated to become more frequent and an impact assessment would be completed on a case by case basis.

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

No assessment of the legal text has been undertaken

**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.*

None

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

No further comments