Joint Office of Gas Transporters

Representation - Draft Modification Report UNC 0800

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

Responses invited by: 5pm on 07 April 2021

To: enquiries@gasgovernance.co.uk

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

Representative:	Heather Ward
Organisation:	Energy Assets Pipelines
Date of Representation:	07/04/2022
Support or oppose implementation?	Support
Relevant Objective:	**c)** Positive **f)** Positive
Relevant Charging Methodology Objective:	Not Applicable

You may like to note a previous Modification *0760 - Introducing the concept of a derogation framework into Uniform Network Code (UNC)*, had been raised in this area, please refer to Ofgem's Decision Letter dated 21 January 2022, published at: https://www.gasgovernance.co.uk/0760

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

We support this Modification as we consider it provides a simplified and efficient route to enabling innovation and should support the delivery of Net Zero.

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

This Modification can be implemented at any time as it does not have any direct impact on central systems.

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

None as a result of this change, specific derogations approved following this change may have an impact.

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

I understand that the definition of 'Derogating Party' is intended to include Independent Gas Transporters, however I not sure that it does.

> **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 (but see comments on Legal Text)

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

N/A