

## 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](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Tom Stuart
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	8.4.22
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	c) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable* <i>delete as appropriate</i>

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 believe it will act as an enabler to progress innovation projects in the industry and provide a clearer path towards net zero targets. This modification should further relevant objective (c) Efficient discharge of the licensee's obligations and relevant objective (f) Promotion of efficiency in the implementation and administration of the Code.

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

Implementation should be immediately following direction from the Authority.

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

No foreseen impacts or costs

**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.*

None observed

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

N/a