

Representation - Draft Modification Report UNC 0799

UNC arrangements for the H100 Fife project (100% hydrogen)

Responses invited by: **5pm on 20 May 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Oorlagh Chapman
Organisation:	Centrica
Date of Representation:	20/05/2022
Support or oppose implementation?	Support
Relevant Objective:	a) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

We support the intention of this modification to demonstrate 100% hydrogen can be used as an alternative to natural gas. We suggest an appropriate lead time is allowed for the implementation of this modification and the significant changes that are required via the CDSP change XRN5298 - H100 Fife Project Phase 1 to shipper and supplier platforms, billing systems and business processes to accommodate the H100 trial.

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

Significant changes are required, a minimum of 6 months lead time would be required. February 2023 release would be preferable.

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

Material costs identified, level of change required to systems and bespoke processes to accommodate the H100 Trial are significant.

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

We are comfortable with the legal text and have no additional comments.

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

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

N/a