

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

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

<b>Representative:</b>	Richard Pomroy
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	20 <sup>th</sup> May 2022
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<p>a) None</p> <p>c) Positive</p> <p>d) None</p> <p>f) Positive</p>
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

We support this modification as it is a necessary step to demonstrate that gas networks can be repurposed to transport hydrogen and support the UK Governments Net Zero obligations.

It furthers relevant objectives (a) *Efficient and economic operation of the pipe-line system* because it puts in place measure to enable the licensee’s pipeline system to operate efficiently when the system transports both natural gas and hydrogen; (c) *Efficient discharge of the licensee's obligations* because it puts in place arrangements that enable the licensee to discharge its obligations when transporting hydrogen; (d) *Securing of effective competition between Shippers* because it puts in place arrangements that secures that competition will continue when hydrogen is transported; and (f) *Promotion of efficiency in the implementation and administration of the Code* because it makes clear the arrangements that apply in the case where a network chooses to transport hydrogen in accordance with the Gas Act and its licence.

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

This modification can be implemented following an Authority direction to do so.

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

None, these arrangements will not impact the WWU network.

**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.*

No

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

This modification demonstrates that good preparation and quick responses to questions by the proposer can enable a detailed modification to proceed quickly through a workgroup.