

Representation - Draft Modification Report UNC 0680S

UNC Changes as a Consequence of 'no deal' United Kingdom Exit from the European Union

Responses invited by: **5pm on 11 April 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Phil Lucas
Organisation:	National Grid
Date of Representation:	8 April 2019
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

As Proposer, National Grid supports implementation of this Proposal. The United Kingdom's exit from the European Union (EU) in absence of a Withdrawal Agreement would necessitate a quantity of minor amendments to the Uniform Network Code (UNC) as described in the Proposal. In summary, the changes ensure the UNC remains consistent with the revised legislative and operational regime that will exist post exit from the EU. This will eliminate any ambiguity which would prevail if these changes were not made and thereby promote efficiency in the implementation of the Code consistent with relevant objective f).

Self-Governance Statement:

Given the scale and materiality of the changes proposed to the UNC, we continue to believe that application of self-governance procedures to this Proposal is entirely appropriate.

Implementation:

Implementation is sought as soon as practicable following the decision to implement the Proposal. In this respect, we note that:

- the decision to whether implement this Proposal is not able to be made by the UNC Modification Panel until there is certainty that the United Kingdom will leave the EU in absence of a Withdrawal Agreement (a 'no deal' exit); and
- as a self-governance Proposal, the earliest implementation date is the sixteenth (16th) business day following the decision to direct implementation.

Impacts and Costs:

National Grid will not incur any specific additional costs as a consequence of the implementation of this Proposal.

Legal Text:

We are satisfied that the legal text delivers the intent of the solution identified in this Proposal.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

We have not identified any such error or omissions.

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

N/A