

Representation - Draft Modification Report UNC 0760

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

Responses invited by: **5pm on 20 September 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	20 th September 2021
Support or oppose implementation?	Support
Relevant Objective:	c) Positive f) Positive

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

We agree that that the introduction of a derogation process in the UNC will facilitate innovation. The initial use case is for Net Zero but we expect further use cases could be developed in future. This modification will further relevant objective (c) *efficient discharge of the licensee's obligations* by enabling Transporters to develop Net Zero projects such as hydrogen blending or villages as desired by the UK government's Net Zero strategy. It will also further relevant objective (f) *promotion of efficiency in the implementation and administration of the Code* by providing a clear process for derogations in the UNC avoiding the need for a time limited UNC modification. The information required for a derogation request is significant and we think that this and the requirement for a unanimous UNC panel vote in favour of granting the derogation provide sufficient safeguards for all interested stakeholders.

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

We agree that implementation can be no earlier than 16 day after an Authority direction to implement.

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

None immediately, adjustments may be required for individual derogations but these will be assessed at the time.

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

We expect that the Guidance Document may need some minor amendments following experience gained from the first derogation application.