

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:	Clare Manning
Organisation:	E.ON
Date of Representation:	19/05/2022
Support or oppose implementation?	Support
Relevant Objective:	a) Positive c) Positive d) Positive
Relevant Charging Methodology Objective:	Not Applicable * <i>delete as appropriate</i>

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

We absolutely support the intention of this modification and have actively participated in the working groups and engagement sessions. Our only reservation is that both shippers and suppliers will have to invest in costly system changes to ensure that the end consumer is billed correctly and these costs are not being borne by the project. Both shipper and supplier will have to invest whether or not they are actually the shipper/supplier or not for any sites partaking in the trial in case the customer wishes to change supplier. It may well be wasted investment, particularly given it is not proposed that future hydrogen trials will use an amended multiplication factor.

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

Implementation should be after the system changes have been implemented under XRN5298

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

We will incur costs as a shipper via the Xoserve change process and the changes required to our invoicing system. As a supplier we will incur costs to change our consumer billing systems and our change of supply processes. We have not fully scoped out the extent of the changes required.

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

We are satisfied that the legal text will deliver the intent of the solution

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 identified

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

No further comments