

Joint Office

Enquiries@gasgovernance.co.uk

27 March 2019

Dear Joint Office,

Re: UNC Modification Proposal 0680S – UNC Changes as a Consequence of “No Deal” United Kingdom Exit from the European Union

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network’s (NGN) comments in respect of this Modification.

NGN supports this Modification proposal

Reasons for Support/Opposition:

We support this modification as the changes proposed will ensure that the UNC remains accurate and relevant to the current laws and regulations for the United Kingdom post Brexit.

Self-Governance Statement

We agree that this modification should be subject to self-governance procedures as it is seeking to update references only.

Implementation:

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

We believe this modification could be implemented as soon as possible after UNC Panel approval, in the event of a no deal Brexit.

Impact and costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

We have not identified any potential costs or impacts to NGN as a result of this change.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We agree that the legal text provided will deliver the solution set out in the modification.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

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We agree that modifying the existing references to EU regulations to those of the UK will ensure that the UNC remains accurate and relevant, thus furthering Relevant Objective (f) Promotion of efficiency in the implementation and administration of the Code.

Are there any errors or omissions in the Modification Report?

None identified.

Any additional analysis or comments?

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Shanna Key (via email)
Industry Codes Officer

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