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| **Consultation Response** |
| IGT154: Introducing the concept of a derogation into the IGT UNC for innovation projects |
| Responses invited by: 18 10 2021 |
| **Respondent Details**Name: Heather WardOrganisation: Energy Assets Pipelines |
| Support Implementation SQualified Support ☐Neutral ☐Do Not Support ☐ |
| **Please briefly summarise the key reason(s) for your support / opposition**As the proposer of this modification, I believe that this modification will facilitate innovation within the gas market by enabling ideas to be trialled for a limited period or within a restricted geography, without required code modifications to be raised each time. As this modification has been developed in parallel with a modification to the UNC, it will also support innovation projects where there is an interaction between GDN and IGT networks.The concept of a derogation exists in other codes and is utilised where required. Creation of the derogation framework should allow for different types of derogation categories ‘Use Cases’ to be defined as they are required by the market. |

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| **Self-Governance StatementDo you agree with the Modification Panel’s determination with respect to whether or not this should be a self-governance modification?** I agree with the IGT UNC Panel that this modification should be subject to Authority direction. The Modification will cause a material change to the IGT UNC Modification procedures by introduction of the concept of derogation throughout the IGT UNC, which means that self-governance procedures should not apply as defined in the Gas Transporters Licence Standard Special Condition A9. In addition, whilst this Modification does not have a material impact on competition or operation of the pipeline system, should this Modification be approved then derogations of material impact may be requested for consideration. |
| **Please state any new or additional issues that you believe should be considered**None |
| **Relevant ObjectivesHow would implementation of this modification impact the relevant objectives?**This proposal is expected to have a positive impact on relevant objective B by ensuring that any innovation trials within a geographic area that includes one of more IGT networks are able to incorporate those networks.It is also expected to have a positive impact on relevant objective F by:a) removing the requirement to modify the IGT UNC to enable trials for innovation projects, which by their nature may not progress further and therefore result in a requirement for further modifications.b) allowing parties to apply for derogations and thus making non-compliance visible; it will allow the impacts on other parties to be known and considered and the actions the applying party is taking to mitigate these. |
| **Impacts and CostsWhat development and ongoing costs would you face if this modification was implemented?**There are expected to be no development or ongoing costs as a result of this modification being implemented, however costs may be incurred as a result of any derogation requests. It is expected that the governance arrangements for derogation requests being introduced by this modification would lead to the consideration of any such costs and how they should be allocated to parties. |
| **ImplementationWhat lead time would you wish to see prior to this modification being implemented, and why?**This modification does not in itself require any changes to central systems and as such should be implemented in the next available release of the IGT UNC following Authority determination. |
| **Legal TextAre you satisfied that the legal text will deliver the intent of the modification?**Yes |
| **Further CommentsIs there anything further you wish to be taken into account?**No |
| **Responses should be submitted by email to IGTUNC@gemserv.com** |