

Consultation Response

IGT160: Introducing the concept of a derogation into the IGT UNC for innovation projects

Responses invited by: 18 May 2022

Respondent Details
 Name: Michelle Brown
 Organisation: Energy Asset Pipelines

Support Implementation	<input checked="" type="checkbox"/>
Qualified Support	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Do Not Support	<input type="checkbox"/>

Please briefly summarise the key reason(s) for your support / opposition

As proposer of this modification we fully support this being implemented as it will give a framework for derogations in the IGT UNC to mirror that which is expected to be implemented in the UNC Thus enabling IGTs to develop innovation projects and to support the delivery of Net Zero.

We note that this Modification is a development of IGT 154, which was rejected by Ofgem and has been changed in line with Ofgem’s requests to enable the to approve the Modification.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

EAP agree that this modification should not be a self-governance modification as it would result in a material change to the code, including changes to the Modification Rules and therefore should be sent for Authority Direction which is also the case for UNC0800

Please state any new or additional issues that you believe should be considered

N/A

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We consider that this change would have a positive effect on relevant objectives (B) and (F).

The Modification facilitates co-ordination and co-operation between GDNs and IGTs and between different IGTs by ensuring that any innovation trials within a geographic area that includes one or more IGT networks are able to incorporate those networks and therefore has a positive impact on relevant objective B.

The Modification also removes the requirement to make enduring changes to the IGT UNC to support localised and time limited trials and therefore having a positive impact on relevant objective F by promoting efficiency in the implementation and administration of the Code

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

For modification iGT0160 we confirm that we will not incur additional development or ongoing costs.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

As this modification requires no system changes EAP agree with the lead time proposed can be implemented in the next IGT UNC release and does not need to be implemented on the same day as UNC0800.

Legal Text

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

Yes

Further Comments

Is there anything further you wish to be taken into account?

NO

Responses should be submitted by email to IGTUNC@gemserv.com