

Representation - Draft Modification Report UNC 0606S
National Grid Gas plc and National Grid Gas Distribution Limited
transitional invoicing arrangement post Project Nexus implementation

Responses invited by: 5pm on 06 April 2017

To: enquiries@gasgovernance.co.uk

Representative:	Andrew Margan
Organisation:	Centrica Plc
Date of Representation:	05 April 2017
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

Whilst we understand that National Grid's sale of its Distribution Network has resulted in multiple invoicing changes for shippers and these costs have had to absorb by them and their customers, we also understand that post Nexus Modification 0606 is the most variable solution which will maintain a combined invoice which is subsequently split and re-invoiced using Ad hoc invoicing.

Whilst the arrangements are not efficient, and add risk that payments maybe incorrectly posted, we can't identify a more efficient way forward and therefore we accept the proposal.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

As we can't identify a material impact to British Gas or its customers, we believe self governance arrangements are appropriate.

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

Implementation should be aligned with Project Nexus Implementation Date or earlier.

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

We expect small system costs and small incremental processing costs will be incurred.

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

No issues have been identified

Modification Panel Members have requested that the following questions are addressed:

Q1: In order to inform consideration of the governance, please provide views on the materiality of the impacts of the proposal.

As we can't identify a material impact to British Gas or its customers, we believe self governance arrangements are appropriate.

Q2: Respondents to identify the extent of the impacts on their systems.

We expect small system costs and small incremental processing costs will be incurred.

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