

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:	Gavin Anderson
Organisation:	EDF Energy
Date of Representation:	06.04.17
Support or oppose implementation?	Qualified Support
Relevant Objective:	f) Negative

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

EDF Energy is left with no option other than to recommend that this modification is implemented. However, we would like to place on record our disapproval for the way in which the need for this modification has come to fruition.

Project Nexus has been either in discussion, design or delivery for a number of years, which National Grid have been abundantly aware of. It is therefore extremely disappointing that Shippers are expected to foot the bill associated with an obvious lack of planning or miss-management by National Grid. Furthermore, not only are Shippers, and therefore customers, expected to burden this cost it is as a result of a decision taken by National Grid to sell part of its business, making large profits in the process.

EDF Energy places a huge importance on ensuring Nexus does not suffer any further, avoidable, delays and we believe National Grid are very aware of the desire of the industry to finally deliver on Project Nexus and were therefore unlikely to encounter any strong objection to this modification.

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

We agree this should be self-governance

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

The modification should be delivered in line with PNID or before

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

Our business will incur significant costs in order to manage the requirements of this modification.

Of greatest concern is that the modification does not propose any end date and the subsequent ongoing cost this will cause for a potentially indefinite period.

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

Yes

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.

This change will have an adverse financial impact on EDF Energy as well as our ability to respond to any further industry change in a timely fashion.

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

The changes will require changes to our systems that will amount to tens of thousands of pounds.

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.*

No

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

N/A