

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:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	4 th April 2017
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

We support this modification as without it an organisation would be unable to develop its business due to the constraints imposed by Project Nexus.

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

We currently support self-governance status.

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

On Project Nexus Implementation Date

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

None

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.

WWU is not impacted by this modification

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

WWU is not impacted by this modification

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.*

Insert Text Here

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

We have some concerns that this is not how the invoicing process was intended to work and there is potential for errors. We note that this modification has been amended to address Shipper concerns regarding who bears the risk should the credit not be raised on the same day as the debit. We note that although the intention is for Xoserve to amend its system so that NGGD and NG NTS invoices can be issued separately the end date is not hard coded and is dependent on a notice being issued, however given the current uncertainty as to when the changes can be implemented we can understand why proposer has taken this approach.