

## Representation - Draft Modification Report UNC 0602 0602A

### Implementation of Non Effective Days and Variant Non-Business Days for Project Nexus Implementation, maintaining a minimum of two Supply Point System Business Days (Project Nexus transitional modification)

Responses invited by: **5pm on 09 February 2017**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Gavin Anderson
<b>Organisation:</b>	EDF Energy
<b>Date of Representation:</b>	08/02/17
<b>Support or oppose implementation?</b>	Support/Oppose/Qualified Support/Comments* <i>delete as appropriate</i>  0602 - Oppose  0602A - Support
<b>Alternate preference:</b>	<i>If either 0602 or 0602A were to be implemented, which would be your preference?</i>  0602A
<b>Relevant Objective:</b>	<b>d)</b> Positive  <b>f)</b> Positive

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

EDF Energy does not support 0602 and believes that the alternative 0602A would better meet the relevant objectives in the interest of consumers.

The CDSP (Xoserve) has indicated that they would be unable to deliver the requirements of 0602 without it presenting significant risk to the timely delivery of the Nexus solution. Given the significant delay to date, we would oppose any change that could potentially further delay Nexus.

Whilst we do agree that 0602 would deliver the required Non Effective and Variant Non Business Days we believe that 0602 would not be able to deliver the minimum 1 day required for shippers to manage supply transfer objections. Indications from Xoserve are that 0602 would allow, at best, a 5 hour window to manage objections. EDF Energy do not believe this is manageable and this therefore presents an increased risk to customers of Erroneous Transfers (ET).

EDF Energy does support 0602A

UNC 0602A would provide shippers with a 2 day window in which to manage objections, which we consider is reasonable and minimises the risk of ET's to consumers as set out above.

Xoserve has indicated that they could deliver the requirements of 0602A without the need for significant change to the system design. This in turn has a positive impact on shippers as they will not need to make extensive or costly changes to systems to deliver 0602A.

We also consider that 0602A will provide us to better plan the lead in and cut over phase of the delivery by providing the option to control the flow of information into UK Link and potentially minimising the impact to our BAU operations by allowing Shippers to choose to cut-over systems during a weekend.

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

The change will have a material impact on customers and therefore should not be self-governance.

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

EDF Energy would welcome a decision on this change as soon as possible. The key to being able to successfully deliver the outcome, as part of the broader Nexus delivery, is knowing at the earliest opportunity what needs to be planned into the system calendar.

In addition to the need for a swift response to this modification, EDF Energy would encourage Ofgem to consider whether the arrangements required, should a decision be taken to defer implementation of Nexus to the 1<sup>st</sup> July contingency date, should be included within this or an alternate modification.

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

Xoserve has indicated that 0602 would require shippers to make changes to their Nexus design. We do not believe it is reasonable or acceptable to add any further cost or delay to the Nexus delivery.

The costs of implementing the requirements of Nexus have always assumed there would be a period of 'shut down' during cut over. Based on understanding of 0602A, which assumes no additional system change is required, we believe the cost would already be factored into the overall Nexus delivery plan.

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

Yes

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

*Q1: Respondents are requested to provide views as to whether Modification 0602 provides sufficient time for objections to be raised.*

Although 0602 suggests that it will provide a 1 day window for objections, Xoserve have indicated that this is more likely to be around a 5 hour window in reality. We believe that this provides insufficient time to properly manage the objection process.

The 2 days provided within 0602A would provide a more suitable window to manage objections, thus minimising risks to customers.

**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