



Hinckley Operational Centre
Brick Kiln Street
Hinckley
Leics
LE10 0NA

National Gas Emergency Service - 0800 111 999* (24hrs)
*calls will be recorded and may be monitored

Bob Fletcher
Joint Office of Gas Transporters
Consort House
Princes Gate Buildings
Solihull
B91 3QQ

Andy Clasper
Regulation & External Affairs
National Grid Distribution
Andy.clasper@nationalgrid.com
Direct tel +44 (0)1926 655299

www.nationalgrid.com

08 February 2017
Your Reference:UNC Modification Proposal 0602/0602A

UNC Modification Proposal 0602/0602A – Implementation of Non Effective Days and Variant Non-Business Days for Project Nexus Implementation (Project Nexus transitional modification)

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposals for which National Grid Gas Distribution (NGD) would like to offer comments and support.

Do you support or oppose implementation?

0602 - Comments
0602A - Support

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

As proposer we raised Modification 0602 to enable an efficient transition to the new UK Link systems, maintaining a Shipper User Supply Point objection 'window' of a minimum of one day whilst minimising any consumer impact. However, it recently became apparent that Xoserve's ability to implement 0602 in a timely manner was in some doubt as the industry was advised that unforeseen additional system amendments would be required. Xoserve further identified that it would not be possible to implement such changes in time for the Project Nexus implementation Date (PNID) on 1st June 2017.

Modification 0602A provides for a minimum of 2 Supply Point System Business Days to allow Shipper Users adequate time to process Supply Point objections although this may extend overall timescales for the transfer of a Supply Point registration. We note that 0602A can be implemented at PNID as the UK Link changes required are to a parameterised field only. It is for this reason that we support implementation of 0602A.

Relevant Objectives:

d) Securing of effective competition:

(i) between relevant shippers;
(ii) between relevant suppliers; and/or
(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

f) Promotion of efficiency in the implementation and administration of the Code.

NGD concurs with the comments in the Draft Modification Report concerning the facilitation of these relevant objectives.

Impacts and Costs:

We agree with the statement in the Draft Modification Report concerning the funding of this Modification Proposal and we have no further comment in this respect.

Implementation:

We are in agreement with the implementation timescales identified within this Modification Proposal.

Legal Text:

We have provided the Legal Text for both 0602 and 0602A. We are satisfied that both sets of text deliver the intent of the solutions.

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.

We understand that Shipper Users may have differing views on whether Modification 0602 provides sufficient time for Supply Point objections to take place.

Views on errors or omissions in the Modification Report which should be taken into account:

We have not identified any such errors or omissions.

Additional analysis or information to support your representation:

We have nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 655299 (andy.clasper@nationalgrid.com) should you require any further information.

Yours sincerely,

Andy Clasper
National Grid Distribution