

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

Representative:	Phil Lucas
Organisation:	National Grid
Date of Representation:	8 th February 2017
Support or oppose implementation?	0602 - Oppose 0602A - Support
Alternate preference:	<i>If either 0602 or 0602A were to be implemented, which would be your preference?</i> 0602A
Relevant Objective:	f) Positive (0602A)

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

National Grid NTS values certainty in respect of the transitional arrangements to apply for the implementation of new UK Link systems (currently planned for 1st June 2017). Implementation of Modification Proposal 0602A would provide such certainty and on this basis we believe it would better facilitate relevant objective f) Promotion of efficiency in the implementation and administration of the Code. We therefore support implementation of 0602A.

We note the representation submitted by Xoserve dated 6th February 2017 confirming that Modification Proposal 0602 is not able to be implemented without adversely impacting the ability to meet the existing planned implementation date for new UK Link systems. Accordingly we do not support implementation of 0602.

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

National Grid NTS concurs with the conclusion of the Workgroup that the potential impact on competition of a number of 'Non Effective' and 'Variant Non-Business' days

may be material in terms of the implications for consumers and competition. On this basis, we agree that it is appropriate for Ofgem to make a determination in respect of these Proposals.

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

National Grid NTS has no specific lead time for implementation of either Proposal. However, as noted above, we would welcome certainty in respect of the transitional arrangements to be applied for implementation of new UK Link systems as soon as possible.

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

National Grid NTS would not incur any implementation costs specifically attributable to the implementation of Modification Proposal 0602A on the basis that this Modification *would not* require a delay to the implementation of new UK Link systems.

Given the statement from Xoserve that implementation of Modification Proposal 0602 *would* adversely impact the ability to meet the currently scheduled implementation date for new UK Link systems, it is highly probable implementation of this Proposal would expose National Grid NTS to a level of additional costs. These will be incurred as a consequence of the need for an extended system development programme to address a deferred implementation date. At this stage we have not fully assessed or determined the level of such additional costs.

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

National Grid NTS is satisfied that the legal text delivers the intent of the respective solutions advocated by these Modification Proposals.

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.

As National Grid NTS is not directly impacted by this subject matter of this question, we have no view on this point.

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.*

National Grid NTS believes that the Modification Report should additionally reflect the new information Xoserve has provided in its representation regarding the impacts of implementing Modification Proposal 0602 or 0602A on the implementation date for new UK Link systems.

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

N/A