

## Representation

### Draft Modification Report

#### 0513 Urgent - UK Link Programme (Project Nexus) - independent project assurance for Users

**Consultation close out date:** 03 September 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Total Gas & Power Ltd  
**Representative:** Andrew Green  
**Date of Representation:** 03 September 2014

#### Do you support or oppose implementation?

Qualified Support

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

TGP fully supports the principle of a project assurance function under the UK link programme which incorporates the extensive Project Nexus industry changes. However TGP offers qualified support for the following reasons. Due to the magnitude of the changes to the way the industry will operate in future, TGP believes that the project assurance function should be extended to include Xoserve readiness. It is as important for Ofgem and Shippers to have independent assurance about Xoserve as it is for Ofgem and Xoserve to have assurance about Shippers. TGP does not believe that this should be funded through User Pays but should be funded by the allowed revenue for UK link and Nexus as Project Assurance regarding industry readiness and associated risks should be a function of such a large programme of cross industry change.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

TGP believes it is not appropriate for a UNC modification to put forward commercial entities to carry out any work associated with the modification.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

- (d) Securing of effective competition
- (f) Promotion of efficiency in the implementation and administration of the Code.

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Version 1.0

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**Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

Marginal costs associated with co-operating with the performance assurance function

**Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

TGP believes that the finalised report must be produced by December 2014

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

Too short notice to have been reviewed

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No