

Representation - Draft Modification Report 0528

Implementation of Supply Point Administration, gas allocation and settlement arrangements (Project Nexus transitional modification)

Responses invited by: **12 May 2015**

Representative:	Graham Wood
Organisation:	British Gas
Date of Representation:	12 th May 2015
Support or oppose implementation?	Oppose
Relevant Objective:	

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

Whilst we support the intent of this modification proposal, which is required to enable an orderly and efficient transition from the current UNC arrangements to the Project Nexus arrangements being introduced by UNC Mod432, we do not support the proposal as currently drafted.

Shippers have made numerous requests to Xoserve for more engagement and involvement in the transition detail, with Xoserve recently agreeing to a workshop to be held on this issue as part of the May UKLIEF session scheduled for 20 May. We believe this to be an important step in ascertaining whether the detail in the business rules and Modifications is sufficient to meet, not just Transporter needs but the needs of Shippers too.

The handling of transition arrangements from a Shippers perspective is complex and absolute clarity is required in order to cover the wide range of scenarios and topics affected. It would seem prudent to progress this modification proposal once the workshop has taken place to capture and address Shipper concerns, rather than having the risk of further modifications being required.

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

We do not support implementation of this proposal as currently drafted.

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

n/a

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

We do not support legal text as currently drafted.

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.*

n/a

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

n/a