

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:	Natasha Ranatunga
Organisation:	EDF Energy
Date of Representation:	12 May 2015
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

EDF Energy agrees that implementation of UNC 0528 which sets out the arrangements necessary to migrate from the existing regime to the enduring Nexus regime would provide clear rules and guidance on the treatment of data existing and provided under the UNC before and during implementation of UK-Link Replacement. It is important to ensure that there is an orderly transition to the enduring Nexus regime.

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

We would like UNC 0528 to be implemented as soon as possible in order to ensure we have as much certainty as possible about the delivery of Nexus.

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

If UNC 0528 is not implemented we will not have any certainty over how these activities will be managed in the transitional period. This could potentially add extra costs and potential rework to our Nexus programme as seek to obtain clarity from Xoserve on how it will handle certain activities.

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

We have not reviewed the legal text in detail. However we note that if UNC 0537 is implemented the date for the last AUG statement may need to be revised if implementation is pushed back by 6 months.

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.*

We believe that there are issues in the Transition Business Rules (“Rules”) that need to be considered if either UNC 0536 or UNC 0537 is implemented.

- The Rules relate to specific dates with regard to the AQ Review transition and how appeals, amendments and Mod 640 are handled as well as the interim dates for the formula AQ calculation (7.6 & 7.7) - these will need to be reviewed if there is a delay to the implementation date if UNC 0537 is implemented.
- The rules on Adjustments (7.10) & Unique Sites (7.9) will need to be revised if Retrospective Updates and Unique Sites are not in scope of the initial release of Nexus by Xoserve if UNC 0536 is implemented.

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

None