

Representation - Draft Modification Report 0531

Provision of an Industry User Test System

Responses invited by: **5pm 09 September 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Fraser Mathieson
Organisation:	SGN
Date of Representation:	08 th September 2016
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Positive f) Positive

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

SGN offers qualified support for this modification. We consider that the provision of an industry user test system will assist in providing confidence to Users and the industry that, as parties implement changes to their systems post Project Nexus, these systems are suitable and fit for purpose and that the risk of unexpected impacts is minimised where changes are put into production. However, we believe a cautious and measured approach must be taken in developing system changes on this scale, particularly given their potential to distract from the delivery of RAASP and other large-scale industry changes requiring dedicated resource.

We agree that Shipper Users are likely to be the only users of the proposed service and therefore should fund 100% of the development costs as a User pays service with such development costs being smeared according to market share and ongoing costs recovered according to decision by the UK Link Committee for each change.

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

SGN agree this is not a self-governance modification as the prospective ongoing and developmental costs are material.

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

Implementation as soon as is reasonably practicable, whilst having regard to the delivery of RAASP and other industry change, is recommended to provide certainty to parties that a test environment will be available.

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

None.

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

Yes.

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