

Representation – Urgent Modification 0532

Implementation of Non-Effective Days (Project Nexus Transitional Modification)

Responses invited by: **15 January 2016**

Representative:	Angela Love
Organisation:	ScottishPower Energy Management Limited
Date of Representation:	15 th January 2016
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Negative f) Positive

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

ScottishPower would like to provide qualified support for this modification, as whilst it is viewed as necessary to ensure the smooth implementation of Project Nexus, the company is concerned about the potential impact on switching obligations and customer expectations. Whilst Ofgem have indicated that they will be sympathetic to issues of performance against switching obligations, we believe that it would be beneficial for Ofgem to set out their position on this in their determination of MOD532.

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

ScottishPower would like to see the modification implemented as soon as possible following an Ofgem decision. Early certainty is necessary given that the proposal will result in significant impacts to business processes and systems to accommodate the proposed changes.

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

There will be costs associated with pausing processes and holding data flows for transmission at a later date. However ScottishPower is still considering the implications of this and determining the most effective way of clearing backlogs at go-live and therefore cannot provide an indication of costs. ScottishPower believes that detailed industry discussions should be held to consider how best to manage the varying scenarios, given the many processes and parties affected. The outcome of this should be the creation of a plan to ensure that impacts on consumers are minimised, wherever achievable, and timescales remain as in line with business as usual, as much possible.

ScottishPower are also concerned over Xoserve being able to process such a large backlog, across multiple market participants, upon go-live of their new system, in particular with the hyper-care work that may be necessary. ScottishPower would therefore welcome clarification of how Xoserve are going to manage backlogs and how progress/issues will be reported to the industry and resolved.

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 that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No

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

None