

## Representation Draft Modification Report

### Urgent Modification 0548 - Project Nexus - deferral of Implementation Date

1. **Consultation close out date:** 31<sup>st</sup> July 2015
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:** Gazprom Energy  
Bauhaus, 5<sup>th</sup> Floor  
27 Quay Street  
Manchester
4. **Representative:** Steve Mulinganie  
Regulation Manager  
[stevemulinganie@gazprom-mt.com](mailto:stevemulinganie@gazprom-mt.com)  
07590 245 256
5. **Date of Representation:** 29<sup>th</sup> July 2015
6. **Do you support or oppose Implementation:**  
We give **Qualified Support** for implementation of Modification 0548
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
We believe the modification should have focused solely on the change of date from 1<sup>st</sup> October 2015 to the 1<sup>st</sup> October 2016 as supported by the Project Nexus Steering Group. It should not include addendums for either the introduction of additional checkpoints of which, although useful, many are yet to be formally agreed. Indeed the Project Nexus Market Trials Steering Group has only met for the first time this week. Neither should it introduce new powers for Ofgem to be able to change these dates unilaterally in the future.
8. **Are there any new or additional Issues for the Modification Report:**  
Not applicable
9. **Self-Governance Statement Do you agree with the status?**  
Yes
10. **Relevant Objectives:**  
*How would implementation of this modification impact the relevant objectives?*  
Not applicable

#### **11. Impacts & Costs:**

*What analysis, development and on-going costs would you face if this modification was implemented?*

Our Nexus Project would need to take into account the revised Go Live date however it reflects the outcome of the independent analysis undertaken by PWC for the Steering Committee.

#### **12. Implementation:**

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

It is important that the revised Nexus Go Live Date is updated as soon as reasonably practicable as the current date in code is now superseded.

#### **13. Legal Text:**

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

We have not reviewed the Legal Text provided.

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

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

We are concerned that the modification proposal which was supposed to focus on the change of date to reflect the outcome of the analysis by PWC for the Steering Group has now included “addendums” which go beyond the scope of an agreed date change to include checkpoints many of which, in particular those relating to market testing, are yet to be ratified and empowering Ofgem to be able to change the date unilaterally. The Urgent nature of the modification precludes the ability to properly consider the appropriateness of these addendums.