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31<sup>st</sup> July 2015

Your Reference: UNC Modification Proposal 0548

### UNC Modification Proposal 0548 - Project Nexus – deferral of Implementation Date

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal which, as proposer, National Grid Gas Distribution (NGD) would like to support.

#### **Do you support or oppose implementation?**

Support

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

NGD believes that the measures identified within the Modification Proposal are fundamental to the timely implementation of Project Nexus on 1<sup>st</sup> October 2016.

#### **Are there any new or additional issues that you believe should be recorded in the Modification Report:**

The Project Nexus Steering Group (SG) has recently identified that the Meter Reading element of 'retrospective adjustments' (Modification 0434) should undergo Market Trials in line with the Core (Modification 0432) changes. The SG has termed the other components of retrospective adjustments being Meter Information and Supply Point address data as 'Retrospective Adjustments for Assets and Supply Points' (RAASP). In relation to this we note that the L3 and L4 Market Trials elements in the Modification and Legal text presently feature a phased timescale pertaining to the arrangements contained within Modifications 0432 and 0434 respectively. However it will be observed that the element of 0434 relating to retrospective Meter Readings undergoing Market Trials on the 0432 timeline is not separately identified in the Modification. However, given that this is clear in the detailed PwC plan which the Modification contemplates, we consider the level of detail required under the UNC to be sufficient for its purpose. This is to identify the fundamental steps which the industry are required to meet to enable implementation of Project Nexus.

### **Self Governance Statement:**

We agree that the Modification Proposal should not be subject to self-governance procedures given its material effect on consumers.

### **Relevant Objectives:**

Relevant Objective: f) Promotion of efficiency in the implementation and administration of the Code.

NGD concurs with the comment in the Draft Modification Report concerning facilitation of the above relevant objective.

### **Impacts and Costs:**

We agree with the statement in the Draft Modification Report concerning the funding of this Modification Proposal and we have no further comment in this respect.

### **Implementation:**

This Modification Proposal can be implemented with immediate effect.

### **Legal Text:**

NGD is satisfied that the drafting and text commentary as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

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

As proposers of this Modification, NGD has sought to incorporate rigor in the requirements and obligations. We consider that UNC Parties should devote a high degree of priority to ensure that Project Nexus is delivered on the revised implementation date. In respect of this we have designated Ofgem as being the sole organisation empowered to authorise any changes to the implementation timetable to be set out in the UNC. Notwithstanding this we anticipate Ofgem would take into full account the views of PwC, the SG and UNC Parties prior to sanctioning change.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 653541 ([chris.warner@nationalgrid.com](mailto:chris.warner@nationalgrid.com)) should you require any further information.

Yours sincerely,

Chris Warner  
Stakeholder Implementation Manager, Distribution