

## Representation – Urgent Modification 0548

### Project Nexus - deferral of Implementation Date

Responses invited by: **31 July 2015**

<b>Representative:</b>	Steve Edwards
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	30/07/2015
<b>Support or oppose implementation?</b>	Qualified Support
<b>Relevant Objective:</b>	f) Positive

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

Wales & West Utilities Ltd (WWU) understand the need to move the implementation date of Project Nexus to 1<sup>st</sup> October 2016, and are in agreement with this proposed date. Further to this, the presence of milestones (or checkpoints) for a project of this scope and scale appears good practice which should be adopted. The qualification of our support arises from the following points:

#### 1. Reference to PwC Implementation Plan

The legal text references the “PwC Implementation Plan”. WWU believe that this is unnecessary as the dates are in the modification and it is poor practice for the UNC to reference a document that is not a UNC related document or a statutory document or other controlled document. WWU agree with the references made within the modification proposal but it is an unwelcome precedent to do so in the UNC itself. To that end, the legal text should be reconsidered.

#### 2. Governance over any future changes to implementation date

The solution seeks to amend the implementation date of Project Nexus to “1st October 2016 or such other date as may be determined by the Authority”. WWU believe that any further modification to the implementation date should be subject to the same UNC modification process as currently required for such changes. By doing so, any future changes would capture industry views on any further delay, enabling a more transparent decision process. Therefore WWU believe the implementation date should be finite and not enduring.

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

Effective management of large projects is supported by clear implementation plans which are supported by the relevant stakeholders to that project. Therefore WWU

support modification implementation at the earliest possible opportunity in order for detailed plans to be drafted to achieve the proposed project implementation date.

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

The lengthening of the project will result in more costs for WWU through the requirement to represent WWU at further project meetings than initially indicated. Until a detailed project implementation plan, together with associated test requirements are published it is difficult to quantify the extent of any further additional costs.

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

As stated in our reason for support above:

1. Reference to PwC Implementation Plan

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**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.*

None noted

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

No additional analyses provided.