

## Representation - Draft Modification Report 0580S

### Implementation of Non Effective Days to enable Annual AQ Review (independent of Nexus transition)

Responses invited by: **5pm on 10 June 2016**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Edward Hunter
<b>Organisation:</b>	RWEnpower
<b>Date of Representation:</b>	10 <sup>th</sup> June 2016
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive

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

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

This modification provides clarity to the number of non-effective days required for the AQ process regardless of the date of industry implementation of Project Nexus. Due to this we support this modification.

We do not believe that the modification should be subject to self-governance procedures as it has resulted in an increase to the number of non effective days.

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

As soon as is practicable.

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

None Identified.

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

Yes

**Modification Panel Members have requested that the following questions are addressed:**

**Q1:** *Please provide clear views and supporting evidence on the self-governance status of this modification focusing, in particular, on whether this proposal is likely to have a material impact upon competition in the shipping, transportation or supply of gas.*

We believe that this modification proposal should not be self-governance as the number of Non Effective days required may have a material impact on customers and/or competition.

*Q2. Views are invited on the number of non-effective days you think are appropriate. Please include justification for your view.*

Seven Non Effective days aligns with the number of Non Effective dates proposed within Modification 0532 therefore appears to be the best and most pragmatic solution.

**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.*

None

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

None