

Representation

Draft Modification Report

0467 – Project Nexus – iGT Single Service Provision; data preparation

Consultation close out date: 18 July 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: British Gas Trading
Representative: Andrew Margan
Date of Representation: 07 July 2014

Do you support or oppose implementation?

Support

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

Modification 467 places the correct obligation on IGTs to work with the main Gas Transporters, shippers and suppliers, to ensure the successful delivery of a new centralised industry platform and settlements regime. British Gas supports this change as we believe it is a critical element for the successful delivery of the holistic industry changes and the co-ordinated IGT Agency Services, which will drive benefits to IGTs, Transporters, shippers and their supply customers.

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

None identified

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As per the draft modification report, this modification should facilitate relevant objective d)

Securing of effective competition:

- (i) between relevant shippers;
- (ii) between relevant suppliers; and/or
- (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

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Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

We agree this is a User Pays modification. No specific comments are available relating to internal costs. The costs of this change have already been incorporated into the wider Nexus project.

Implementation:

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

We note no implementation date is provided within this proposal, although the first data extract from IGTs is required for January 2015. As the IGTs are smaller organisations and require appropriate notification of implementation, we request that the Authority decision is made as soon as reasonably possible, to ensure industry deadlines can be met.

Legal Text:

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

Yes

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

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

From the workgroup discussions we understand that under the solution Section 2.2 the data provisions to the TSO crank-up over time. We believe these accelerated timescales could be challenging for some of the smaller parties and therefore flexibility with these dates needs to be exercised. This consideration does not change the position, that in principle we support this change.