

**Representation - Draft Modification Report 0527**  
**Implementation of Annual Quantity arrangements (Project Nexus transitional modification)**

**Responses invited by: 12 May 2015**

<b>Representative:</b>	Graham Wood
<b>Organisation:</b>	British Gas
<b>Date of Representation:</b>	12 <sup>th</sup> May 2015
<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)**

We welcome this modification that allows use of meter reads prior to Project Nexus go-live date for the purposes of AQ calculation. We note that some Shippers were advocating that no pre Nexus reads could be used, however in our view this would prevent any new rolling AQ's being calculated until 9 months after the Nexus implementation date. We do not believe that this approach would have furthered the objectives of Modification 432 or delivered benefits at the earliest possible opportunity. We support the introduction of a more equitable and fairer settlement regime as soon as possible. The solution proposed by this proposal applies a pragmatic approach and only allows reads that have already been used for AQ calculation to be used within Nexus AQ calculation arrangements. We feel that this approach provides the industry with the necessary security of using reads in a post Nexus environment that pre date the new read validation processes under Nexus.

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

No implementation timescales are proposed. We agree that early implementation would provide certainty to the transition process.

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

n/a

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

Yes, we have no comments on the legal text.

**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.*

n/a

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

n/a