

Representation - Draft Modification Report 0529

Implementation of Retrospective Adjustment arrangements (Project Nexus transitional modification)

Responses invited by: **22 June 2015**

Representative:	John Costa
Organisation:	EDF Energy
Date of Representation:	22 June 2015
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

We believe this modification is needed to allow the efficient transition to the arrangements implemented through UNC 0434 "Project Nexus – Retrospective Adjustment".

This modification clarifies the terms under which Shipper Users can request adjustment of relevant reconciliation invoices following implementation of Project Nexus with respect to adjustment periods prior to Project Nexus Implementation. Without this there could be an adverse financial impact of Shipper Users and ultimately to consumers through inaccurate cost targeting in the period immediately following implementation of Project Nexus.

As such we agree it facilitates Relevant Objective f: the Promotion of efficiency in the implementation and administration of the Code.

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

No implementation date is given however we agree that it could be aligned with the implementation date of UNC 0434 Project Nexus Retrospective Adjustment which is assumed to be the same as Project Nexus implementation date whenever that may be. An early decision on this modification would be welcomed to provide the industry with certainty.

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

No costs have been identified.

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

Yes

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.*

No

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

N/a