



National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

National Gas Emergency Service - 0800 111 999* (24hrs)
*calls will be recorded and may be monitored

Bob Fletcher
Joint Office of Gas Transporters
31 Homer Road
Solihull
B91 3LT

Chris Warner
Stakeholder Delivery, Operate &
Maintain
Distribution
chris.warner@nationalgrid.com
Direct tel +44 (0)1926 653541

www.nationalgrid.com

17th June 2015
Your Reference: UNC Modification Proposal 0529

UNC Modification Proposal 0529 - Implementation of Retrospective Adjustment arrangements (Project Nexus transitional modification)

Dear Bob,

Thank you for your invitation seeking representation with respect to the above Modification Proposal which, as proposer, National Grid Gas Distribution (NGD) would like to support.

Do you support or oppose implementation?

Support

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

NGD believes that the measures identified within the Modification Proposal would facilitate an orderly transition to arrangements identified under UNC Modification 0434 'Project Nexus – Retrospective Adjustment'.

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

We have not identified any such issues.

Self Governance Statement:

We agree that the Modification Proposal should not be subject to self-governance procedures given its material effect on consumers.

Relevant Objectives:

Relevant Objective: f) Promotion of efficiency in the implementation and administration of the Code.

NGD concurs with the comment in the Draft Modification Report concerning facilitation of the above relevant objective.

Impacts and Costs:

We agree with the statement in the Draft Modification Report concerning the funding of this Modification Proposal and we have no further comment in this respect.

Implementation:

This Modification Proposal can be implemented with effect from the Project Nexus Implementation date (presently identified under the Legal Text for Modification 0432) as being 1st October 2015. Should such date be changed through any future UNC Modification, this Proposal can also be implemented without amendment.

Legal Text:

NGD is satisfied that the drafting and text commentary as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

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

We note that the Project Nexus Implementation Date (presently 1st October 2015) is under scrutiny by the industry. We are also aware that based on the recommendations of the Project Nexus Steering Group and the project assurance managers Pricewaterhousecoopers (PwC), the implementation date is likely to be deferred. However, the Modification is sustainable in that the Legal Text is designed to 'track' the Project Nexus Implementation Date as defined in UNC (irrespective of what the actual date might be).

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 653541 (chris.warner@nationalgrid.com) should you require any further information.

Yours sincerely,

Chris Warner
Stakeholder Implementation Manager, Distribution