

Representation - Draft Modification Report 0532

Implementation of Non Effective Days (Project Nexus transitional modification)

Responses invited by: **15 January 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Oorlagh Chapman
Organisation:	British Gas
Date of Representation:	14/1/16
Support or oppose implementation?	Support
Relevant Objective:	d) Negative f) Positive

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

This modification will facilitate the implementation of the replacement of UK-Link systems for key retail processes.

Whilst this proposal in itself will temporarily impact competition the long term benefit of the change will deliver significant benefits, therefore we support this modification.

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

Implementation as soon as possible after authority determination

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

Costs will be incurred to implement this modification. However due to the nature of the wider change programme it is not possible to specify the distinct cost.

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

The implementation of non effective days will create a “backlog” of transactions that will require processing; currently there is not a defined plan for how the processing of these transitional volumes will be managed. This needs to be resolved at the earliest opportunity so that Industry participants can make the necessary arrangements to mitigate further possible impacts to consumers.

We would also like to highlight that Supplier obligations surrounding faster switching will be impacted and that this could have an adverse effect on consumers ability to change supply during this period. We would hope that Ofgem will make clear in their decision letter that they recognise there will be an impact on faster switching timescales and will not take any specific actions against Shippers who are prohibited from being compliant during this period.