

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:	Edward Hunter
Organisation:	RWE npower
Date of Representation:	14 th January 2016.
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 supports the delivery of the UK Link Replacement programme. Due to this it can be considered to facilitate relevant objective f.) Promotion of efficiency in the implementation and administration of the Code.

The modification also extends the transfer timescales for Gas Shippers which has a minor negative effect on competition therefore does not facilitate relevant objective d.) Securing of effective competition between Gas Shippers. When considered alongside the benefit under objective f.) RWE npower does not conclude this to be material.

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

As soon as is practicable.

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

Costs will be incurred due to the number of non-effective days however are part of the Nexus delivery programme.

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

None