

## Representation - Draft Modification Report UNC 0606S

### National Grid Gas plc and National Grid Gas Distribution Limited transitional invoicing arrangement post Project Nexus implementation

Responses invited by: **5pm on 06 April 2017**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Darren Lond
<b>Organisation:</b>	National Grid Gas Transmission
<b>Date of Representation:</b>	6 <sup>th</sup> April 2017
<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 support Modification 0606 as in our opinion it provides a solution which allows both National Grid Gas Transmission (NGNTS) and National Grid Distribution Limited (NGGDL) the ability to levy invoices post Nexus implementation and therefore has a positive impact on Relevant Objective (f) – ‘Promotion and efficiency in the implementation of the Code’.

We also recognise that while an enduring solution would have been preferable, this interim solution was deemed more appropriate at this time, to ensure that there was no additional risk to Project Nexus.

#### Self-Governance Statement: *Please provide your views on the self-governance statement.*

We support the self-governance status of this modification.

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

We believe that the modification can be implemented at Project Nexus Implementation Date (PNID), in order to provide clarity in the invoicing arrangements to all parties.

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

National Grid Gas would incur costs to implement this interim solution, as well as ongoing costs.

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

Yes

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: In order to inform consideration of the governance, please provide views on the materiality of the impacts of the proposal.*

We have not been able to identify material impacts arising from this modification, although do recognise that concerns have been raised by parties during the workgroup process.

*Q2: Respondents to identify the extent of the impacts on their systems.*

We believe that there is, as a result of this modification, minimal impact on the systems managed by the Transporter Agency, Xoserve to generate invoices.

**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**