

## Representation

### Draft Modification Report

#### 0467 – Project Nexus – iGT Single Service Provision; data preparation

**Consultation close out date:** 18 July 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Scottish Power  
**Representative:** Elaine Carr  
**Date of Representation:** 18 July 2014

#### Do you support or oppose implementation?

Support

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

Scottish Power supports the implementation of this modification. We believe it is an essential component in the delivery of the benefits case associated with Modification 440 - 'IGT CSEP Single Service Provision'.

It is imperative that iGTs are engaged in the process of aligning data prior to the 'Go – Live date' of the UK Link replacement system. As recognised, at the workgroups held to develop this Modification, there are areas of discontinuity between the datasets currently held by iGTs and GTs. The data preparation exercise is paramount in ensuring the alignment of these datasets when moving forward into a regime where the data will be stored, managed and controlled centrally on an enduring basis.

In relation to the costs being levied on Shippers in relation to this Modification, we wish to be clear that costs incurred should only be those directly associated with undertaking this data preparation work and should not extend to include those associated with any additional or remedial work being carried out by IGTs/GTs to cleanse their own data.

Scottish Power is committed to the update of accurate information into the Central System. As such we appreciate fully the degree and extent of work required to align the IGT/Xoserve datasets. This exercise will assist in the smooth transition to the new centralised regime.

Scottish Power believe that if this transition modification is not implemented, the extensive work that is being carried out in the industry to cleanse data and align datasets, will be diminished alongside the benefits to the customer that the implementation of the Single Service Provision will deliver.

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

None Identified

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

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We agree with the proposer and have no additional comments

**Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

No further costs have been identified over and above those referenced in the Modification.

In terms of analysis and development, Scottish Power anticipate that there will be an element of additional work (for all shippers) following implementation of this Modification to ensure that cleansed data is uploaded and populated onto the new centralised system. However at this stage, we are unable to quantify the extent of this additional work.

We have taken the view that this will, in the main, be data cleansing/aligning work that will produce benefits the market on an ongoing basis.

We believe that there is a continued requirement to focus on data cleansing, maintenance and control in the lead up to the Nexus system delivery. In addition the introduction of a robust Performance Assurance Framework will ensure that accurate data is maintained on an ongoing basis to the benefit of both customers and the settlement regime.

**Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

Scottish Power would seek an early implementation date, to ensure that there are suitable timescales to allow all shippers to validate the outputs of the data preparation exercise and to raise any queries with the iGT directly. This should also ensure that there is sufficient time available to resolve any issues before the UK Link system replacement Go – Live date.

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

Yes

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

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No further comments