

Representation – Urgent Modification 0573

Project Nexus – deferral of implementation of elements of Retrospective Adjustment arrangements

Responses invited by: **16 February 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Robert Cameron Higgs
Organisation:	Flow Energy
Date of Representation:	15/02/2016
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

Ensuring the delivery of the primary aspects of Project Nexus to confirm an implementation date of October 2016, warrants our support for this proposal. De-scoping elements of UNC Modification 0434 is not in the interests of shippers or consumers *if considered in isolation*, however the acknowledged knock on effects of maintaining this element of RAASP (in any scheduled October 2016 release), requires a positive view of this urgent proposal to safeguard all other Nexus implementation issues.

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

An early decision to provide certainty for all parties would be welcomed.

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

It is disappointing that Shippers will continue to face Nexus implementation costs beyond October 2016. Quantifying these future costs is not straightforward, however this two tiered approach to Nexus delivery (RAASP scheduled for October 2017) brings an unwelcome extra cost layer and administrative/resourcing burden that was not anticipated when Nexus was viewed as a single date implementation issue.

We note that Xoserve confirmed on 29th January that contingency arrangements based on existing automated Meter Information updates and manual consumption adjustments have been identified and agreed as workable within the Project Nexus Workgroup. We would welcome early advice and detail as to how Shippers can best utilise these processes to ensure all assets are as accurate as soon as possible.

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

No comments

Are there any errors or omissions in this Modification that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No comments

Please provide below any additional analysis or information to support your representation

No comments