

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:	Alex Ross-Shaw
Organisation:	Northern Gas Networks
Date of Representation:	12 February 2016
Support or oppose implementation?	Support
Relevant Objective:	f) Positive – Implementation would promote efficiency in the implementation and administration of the Uniform Network Code.

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

Implementation of this proposal would defer implementation of the Retrospective Asset, Address and Supply Point (RAASP) elements of the arrangements identified within Modification 0434 – Retrospective Adjustment.

We support the unanimous view of the Project Nexus Steering Group (PNSG) who determined that development of RAASP should cease. This is based upon the analysis by Xoserve, and endorsed by the Project Assurance Manager, PriceWaterhouseCooper (PwC). Their assessment is that not only would RAASP potentially require a further 12 months to implement but that releasing the resources currently dedicated to RAASP would aid delivery of the core elements of Project Nexus, the effective delivery of which must take priority.

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

We agree with the Modification Proposal that states implementation needs to be effective from 1 October 2016.

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

We agree with the impact and cost assessment contained within the Modification Proposal. NGN would face no costs resulting from the implementation of this Modification but a failure to implement would increase the risk to the effective delivery of Project Nexus, which would have a significant impact on NGN and the wider gas industry.

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 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

N/A