

Representation

Draft Modification Report

0514 - Extending the Daily Metered 'voluntary' service to Project Nexus Implementation Date plus six months

Consultation close out date: 09 December 2014

Respond to: enquiries@gasgovernance.co.uk

Organisation: Wales & West Utilities Ltd.

Representative: Richard Pomroy

Date of Representation: 09 December 2014

Do you support or oppose implementation?

Support

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

We are disappointed that migration away from the voluntary service has not occurred but given this we recognise that this modification is required to avoid problems at NEXUS go live.

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

No

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the Draft Modification Report that this modification will further Relevant Objective (f), the promotion of efficiency in the implementation and administration of the Code.

Impacts and Costs:

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

None if Shippers properly manage the migration during the six month period available.

Implementation:

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

The Draft Modification Report proposes that implementation should be co-incidental with Project NEXUS go live date and we support this. We note that one shipper has requested implementation no later than six months before Project NEXUS go live date to enable

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development of migration processes. We have no objections to this as long as the legal text would work for an earlier implementation date although we do not see that an earlier date is necessary as both Transporters and Shippers are developing processes to support other modifications that will not be implemented until Project NEXUS go live.

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.

We expect Shippers to migrate sites away from DMV in a controlled process during the six month migration period and not leave it until the end or leave Transporters to do the migration.