

Representation - Draft Modification Report 0580S

Implementation of Non Effective Days to enable Annual AQ Review (independent of Nexus transition)

Responses invited by: **5pm on 10 June 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Andrew Margan
Organisation:	British Gas Trading
Date of Representation:	10 June 2016
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

Modification 0477 introduced faster switching, which reduced industry timescales to process AQ data. Considering Capacity bookings and Transportation charges are derived from AQ data, we support the requirement for industry down time to allow the Transporter Agency time to complete the AQ updates and ensure the correct AQ data is calculated and provided to shippers.

Modification 580S originally proposed four AQ non-effective days. Through development the non-effective period was extended to seven days to align it with the Nexus non-effective period. Considering the Ofgem consultation to potentially delay Nexus, we believe it is appropriate for this modification to return back to workgroup for further development. Following Ofgem's Nexus consultation decision, which is expected at the end of June, the workgroup are able to better align the non-effective period to a Xoserve business requirement, rather than to another project.

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

As the non-effective period could have a delay to a customer transfer, this additional time period could have a material impact to customer switching dates. As a result we do not believe this proposal meets the self governance criteria.

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

We require as early as confirmation as possible for internal planning.

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

None identified

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: Please provide clear views and supporting evidence on the self-governance status of this modification focusing, in particular, on whether this proposal is likely to have a material impact upon competition in the shipping, transportation or supply of gas.

See above, paragraph 2.

Q2. Views are invited on the number of non-effective days you think are appropriate. Please include justification for your view.

If Nexus is delayed we considered if the non-effective days should be reduced from 4 days to 2 days, as per last year's proposal.

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.*

None

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

N/A