

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:	Colette Baldwin
Organisation:	E.ON
Date of Representation:	10 th June 2016
Support or oppose implementation?	Qualified Support
Relevant Objective:	f) Positive

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

We need certainty over the number of non-effective days with sufficient notice to ensure that transfer activity is not disrupted unnecessarily. Business processes that support CoS events around the planned Nexus go-live date begin as early as 10th August and we need to have these non-effective dates in place and our processes locked down by this point to ensure that we are clear with our customers about our sales and transfer processes. Since this modification is contingency for a delayed Nexus Go-Live date, any formal decision to delay Nexus would result in this mod needing to be withdrawn or amended by a further urgent mod to a reduced number of days, as fewer would be necessary for the AQ processes. Not having a clear decision at this point on any probable delay is unhelpful.

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

We consider that the decision on non-effective days should remain with Ofgem.

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

We need confidence on non-effective days as quickly as possible, so an early decision to allow us to implement these days before the 10th August.

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

The complexity of system changes close to the Nexus Implementation Date become harder to manage, therefore confidence on what arrangements are necessary reduces our risks and costs. We would need to be clear about the specific non-effective days early in August so that sales conversations and business processes are unambiguous and have sufficient time to be communicated and incorporated into systems.

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

Insert Text Here

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.

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 then the four days would be reasonable.

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.*

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