

Representation

Draft Modification Report

0434: Project Nexus – Retrospective Adjustment

Consultation close out date: 06 January 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: E.ON
Representative: Colette Baldwin
Date of Representation: 06 January 2014

Do you support or oppose implementation?

Support

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

Currently we are unable to amend data beyond the last “significant event”, this can be the Change of Supplier date, or the date of the Last Valid Reading accepted by the Transporters’ Agent. All shippers gain customers where the data hasn’t been maintained as robustly as it should and the ability to correct the data and have that accurately recorded in the supply point register is limited to the last significant event barrier point. By having a process that will allow the correction of data beyond this point will remove the need for manual adjustments of customer bills and records, and will ensure that the supply point register can be maintained more accurately – reflective of actual amendment dates and not rely on information being linked to the C & D store (where real dates and values are maintained offline). Maintenance by Xoserve of the C & D store for data amendments is costly as it is manually updated and has to be manually interrogated when there are queries. It also means there is a lack of transparency on the data being held by Xoserve about the supply point from the shipper – which is inappropriate if it affects their ability to have correct data available to bill the customer.

Equally, shippers have to enter into bi-lateral arrangements to correct data and energy values under voluntary codes of practice rather than being able to rely on accurate settlement with corrected data.

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

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

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Relevant Objective D – securing effective competition between Users, would ensure that accurate data is maintained in a transparent manner, reducing the reliance on a third party to hold a separate view of that data which introduces cost and complexity which can be removed by implementation of this proposal.

Impacts and Costs:

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

Implementation of this modification should be done with Mod 432 to ensure that the costs are minimised while benefits are maximised. We have previously provided detail Costs and Benefits for inclusion in the Nexus CBA Report produced by Xoserve and confidentially to Ofgem.

Implementation:

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

This modification should be implemented at the same time as Mod 432, in October 2015.

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.

No