

## Representation

### Draft Modification Report

#### 0432: Project Nexus – Gas Demand Estimation, Allocation, Settlement and Reconciliation reform

**Consultation close out date:** 06 January 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Co-Operative Energy  
**Representative:** Chris Hill  
**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.

The introduction of monthly, rolling AQ calculation (where a new meter reading has been received) and individual reconciliation for all MPRNs will provide significant benefit to charging accuracy and allocation of costs which will then assist in promoting competition between users.

#### 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 that implementation would be likely to facilitate relevant objectives d) i) and ii) securing of effective competition between shippers and suppliers. It would also be likely, to a lesser extent, to facilitate relevant objectives a) efficient and economic operation of the pipe-line system and f) 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?*

A number of changes would be required to internal systems and processes. However, we believe the benefits deriving from implementation would significantly exceed the costs.

#### Implementation:

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

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The eighteen month implementation lead time proposed seems suitable. However, we would prefer implementation at the start of the 2015-16 gas year should this be possible.

**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.