

Representation

Draft Modification Report

0513 Urgent - UK Link Programme (Project Nexus) - independent project assurance for Users

Consultation close out date: 03 September 2014

Respond to: enquiries@gasgovernance.co.uk

Organisation: DONG Energy

Representative: Lorna Lewin

Date of Representation: 03 September 2014

Do you support or oppose implementation?

Qualified Support

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

DONG Energy supports the intent of the modification to appoint an Independent Project Assurance. However, due to the magnitude of change we would like the scope of the modification widened to include Xoserve & the iGT's to provide Ofgem with an assessment of industry readiness.

We do not agree that this should be funded by Shippers via User Pays but should be included in the revenue provided for the delivery of the UK Link Replacement Programme.

Ofgem already have the powers to request this information from parties, therefore we do not believe that the UNC is appropriate to deliver the report.

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

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that the production of the report will have a positive impact on Relevant Objective 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?

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Implementation:

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

We support the proposed implementation

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

There has not been enough time to satisfy ourselves that the legal text will deliver the intent of the modification.

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.