

### 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:	First Utility
Representative:	Robert Cameron-Higgs
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 individual meter point reconciliation and a rolling AQ will improve the accuracy of gas settlement and the cost allocation between shippers.

## 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?

Modification 0432 will positively impact objectives (d), (a) and (f)

#### **Impacts and Costs:**

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

We have not yet been able to fully quantify our internal costs, however we believe the enduring benefits of this proposal outweigh any costs we will incur.

### Implementation:

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

We fully support the stipulated implementation date of October 2015

#### Legal Text:

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

We have not fully reviewed the legal text

Is there anything further you wish to be taken into account?

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Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

None

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