

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: RWEnpower

Representative: Edward Hunter

Date of Representation: 03 September 2014

Do you support or oppose implementation?

Support

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

RWEnpower understands the risk to the market that a Shipper who is not ready for Nexus go-live may present.

The independent expert will need to be significantly qualified to make a judgement decision on the ability of varying market participants to deliver their own projects. This includes the necessary experience and knowledge of how large scale transformational programmes are delivered, capabilities, milestones and signs of slippage. We believe that there is also a wider remit for the independent expert to show the impact of Nexus on a Shipper's ability to deliver broader converging industry changes such as the DCC go-live.

The publication of a redacted report may drive incorrect behaviour from Shippers who believe a delay is likely, caused by another shipper.

A complete picture of the industry is required, this proposal does not include any assessment of the ability of the Transporter's agent to deliver the project and the project milestones in a timely manner which in turn has a corresponding impact on Shippers. Whilst an overview of project Nexus and its progress is provided to the Gas Change Overview Board we believe it would benefit from independent assessment by a third party.

This modification does not detail any action to be taken if a Shipper is found not to be sufficiently prepared for Nexus which further highlights the current lack of contingency arrangements or fall back plan in the programme.

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

None

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27 August 2014

Version 1.0

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

(d) Securing of effective competition

(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?

Significant time and resource would be required to provide the data and information required by the independent expert for their assessment.

Implementation:

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

This modification is clearly time bound by the implementation of project Nexus.

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