

Joint Office

Enquiries@gasgovernance.co.uk

9 August 2018

Dear Joint Office,

Re: UNC Modification Proposal 0651 – Changes to the Retrospective Update Provisions

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this Modification.

NGN supports this Modification proposal

This modification proposal looks to amend the changes approved via Modification 0434 (Project Nexus – Retrospective Adjustment) to incorporate the requirements of Option 4, the timestamp of Asset data and a one-off data cleansing exercise, which was developed in the Request workgroup, 0624R - Review of Arrangements for Retrospective Adjustment.

Reasons for Support/Opposition:

We support this modification as we believe it is a proportionate solution which considers the issues faced by Shipper Users and the changes already delivered by Project Nexus. It has the added benefit of a one-off data cleanse which could rectify a large portion of existing data errors, aiding future projects such as the Central Switching Service (CSS) which is part of the Ofgem Switching Programme. The data cleanse would also have the affect of reducing the need for a fully automated solution as set out in the original 0434 Modification (approved in Feb 2014). This is supported by Shipper Users advising in their 0624R Review Group consultation responses that the volume of errors requiring corrective updates had not significantly increased since Project Nexus implementation. It could also reduce impacts to central systems during a time of significant change congestion which includes the development of the Ofgem Switching Programme, Un-identified Gas (UIG) investigations and ongoing smart meter rollout.

We agree that this modification would further Relevant Objective d) the securing of effective competition as it should encourage Shipper Users to take a more proactive approach to data accuracy surrounding settlement, which in turn could benefit consumers.

Self-Governance Statement:

We agree that this modification proposal should be subject to Authority Consent.

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Implementation:

We believe that the implementation date should be set by Transporters, with the aid of industry participants via the Data Services Contract (DSC) Change Management Committee where the appropriate lead time for development and market trials should be considered.

Impact and costs:

We do not believe there will be any direct local impacts or benefits to NGN.

Legal Text:

We agree that the legal text would deliver the solution set out in the modification.

Errors or Omissions in the Modification Report:

None identified.

Any additional comments:

None

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,



Shanna Key
Industry Codes Officer

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