

## Representation

### Draft Modification Report

#### 0440 – Project Nexus – iGT Single Service Provision

**Consultation close out date:** 21 March 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** RWE npower Ltd  
**Representative:** Steph Shepherd  
**Date of Representation:** 13<sup>th</sup> March 2014

#### Do you support or oppose implementation?

##### Support

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

It has long been acknowledged that Shippers incur more cost by operating bespoke arrangements for the management of MPRN's on iGT sites. The introduction of a single service provider will bring consistency to the management of data across all sites on the network. It will also enable Suppliers to improve the service to the end Consumer, by harmonising processes across the customer lifecycle. The mandatory roll out of Smart Metering across the UK, and the introduction of the DCC will require a robust framework to deliver the benefits of a 'quicker switching' environment. We believe that introduction of a SSP will contribute toward this by unifying many integral processes in the commercial gas market.

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

Mod 467 (Project Nexus - iGT Single Service Provision; data preparation) outlines the process of data cleansing which is essential for a successful migration of iGT data, and has associated costs for Shippers. The requirements on Shippers to both provide data and cleanse data, are still in development, and if not completed, could impact the successful development of this mod. This is not referenced in the DMR.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

The mod meets the Transporters relevant objectives; (d) increased competition and (f) efficient code administration.

#### Impacts and Costs:

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

The overall cost-benefit case is well documented by Xoserve. However, there is no visibility to Shippers of the costs that will be

0440

Representation

13 March 2014

Version 1.0

Page 1 of 2

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incurred by iGT's through an ASA and how these will be managed if the iGT's are to remain in a revenue neutral position.

Costs to Shippers for the work required for Mod 467 are unknown as outlined above.

**Implementation:**

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

The workgroup report outlines the dependencies affecting the timescales for implementation.

Following the wider consultation undertaken by Xoserve regarding the delivery of Nexus and EU projects, we opted to support option '2b' for April 2016 delivery. We believe that all reasonable steps should be taken by Xoserve to reduce the overall risk to the market, and remain compliant with European directives. Therefore, RWE npower continue to support a later implementation date.

**Legal Text:**

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

Yes. A significant amount of time and legal resource has been invested by the Participants of the workgroup to ensure that the legal text is correct and fit for purpose.

**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.*

A Licence condition on iGT's to appoint a Single Service Provider is essential for the success of this mod to ensure participation across the networks.