

**Representation - Draft Modification Report UNC 0602 0602A**  
**Implementation of Non Effective Days and Variant Non-Business Days**  
**for Project Nexus Implementation, maintaining a minimum of two**  
**Supply Point System Business Days (Project Nexus transitional**  
**modification)**

**Responses invited by: 5pm on 09 February 2017**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Simon Moore
<b>Organisation:</b>	Citizens Advice
<b>Date of Representation:</b>	31 January 2017
<b>Support or oppose implementation?</b>	Qualified Support* <i>delete as appropriate</i> 0602 -Comments* <i>delete as appropriate</i> 0602A -Qualified Support* <i>delete as appropriate</i>
<b>Alternate preference:</b>	<i>If either 0602 or 0602A were to be implemented, which would be your preference?</i> 0602A* <i>delete as appropriate</i>
<b>Relevant Objective:</b>	d) Mixed* <i>delete as appropriate</i> f) Positive* <i>delete as appropriate</i>

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

Citizens Advice will support proposal 0602A. We note the long-term positive effect on competition of Project Nexus implementation, but are concerned about the short-term impact on switching as a result of the long cutover period. We also wish to note concerns with the decision making process in the run-up to these modifications, which has allowed the impacts of the cutover period on consumers to receive insufficient scrutiny.

**Self-Governance Statement:** *Please provide your views on the self-governance statement.*

Insert Text Here

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

Insert Text Here

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

Citizens Advice regrets the impacts both alternate proposals are likely to have on the consumer switching timetable. To the extent that decision was taken elsewhere and is simply being implemented through these proposals, we recognise that the proposers' hands are to an extent tied. However, the failure to adequately consult with consumers

before the decision was made at Project Nexus Steering Group, nor to clearly explain at the implementation stage how the decision was reached or how the tradeoffs with consumer experience were assessed is poor practice.

The result of this has been that while the mod proposals have focused scrutiny on the question of whether to have one or two objection days, they have left untouched the much more significant impact, in terms of its effect on consumer switching experience, of the decision to take 9 non-effective days and 3 variant non-business days to process the 'cutover' to the new system.

In the context of the long cutover period, the addition of either one or two objection days is a relatively minor marginal additional impact. In our view taking 2 days to process objections may be merited given the desire to avoid erroneous transfers as Project Nexus goes live. We await further representations from Xoserve on the implementability of Modification 0602, but on the basis of information supplied to Panel on January 19th, our current view is that the likely additional costs of implementing 0602 in comparison to 0602A do not justify the partial benefit of one fewer day in the cutover transition period.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution(s)?*

Insert Text Here

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: Respondents are requested to provide views as to whether Modification 0602 provides sufficient time for objections to be raised.*

Insert Text Here

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

Insert Text Here

**Please provide below any additional analysis or information to support your representation**

Insert Text Here