Representation - Draft Modification Report 0528

Implementation of Supply Point Administration, gas allocation and settlement arrangements (Project Nexus transitional modification)

Responses invited by: 12 May 2015	
Representative:	Colette Baldwin
Organisation:	E.ON
Date of Representation:	12 th May 2015
Support or oppose implementation?	Oppose * delete as appropriate
Relevant Objective:	f) None* delete as appropriate

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

The modification has been raised and developed on the basis of an Oct 1st 2015 implementation date as currently determined by Mod 432. Now that the Project Nexus Implementation Steering has recommended a delay to the delivery of the programme (with deferred elements delivery timescales are not clear) a revised implementation timescale is being investigated by the Programme Assurance Manager we would like more time to re-assess the modification with a view to understanding the impacts if the modification were implemented mid gas-year.

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

We would like to see the modification delayed until a new implementation date for Nexus is confirmed.

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

We don't have separate costs for transition activities over our main project costs.

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

As we need to re-consider the modification in light of planned Nexus delayed delivery we can't confirm that the legal text is satisfactory.

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.

Events have overtaken this modification with a revised implementation date likely, then consideration should be given to a part-year implementation impact assessment.

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