

Representation - Draft Modification Report 0535

Implementation of Non Effective Days to enable Annual AQ Review (independent of Nexus transition)

Responses invited by: 12 June 2015

Representative:	John Costa
Organisation:	EDF Energy
Date of Representation:	12 June 2015
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

We agree that this proposal would help facilitate the smooth and effective running of the AQ Review process this September. The two extra Non Effective days of the 29th and 30th September should allow more time to process the large volumes of data this year following the implementation of faster switching under UNC0477 and the uploading of the Winter Annual Load Profiles into SPA. This change should help ensure that Gemini will be able to publish robust Demand figures for NDM sites without posing a risk to the Energy Balancing processes and consequently individual User positions. For these reasons we agree this modification would further relevant objectives D) competition between relevant shippers/ suppliers and f) the efficient implementation and administration of the Code.

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

We agree it would be desirable if this modification were implemented by 02 July 2015 upon direction to add certainty to the process.

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

This change may limit a supplier's ability to issue objections through their Shipper, however the impact of this is likely to be minimal.

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

N/a

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.*

None, however we expect this proposal to be a one off instance and not be needed should Project Nexus be delayed until October 2016.

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

N/a