

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

Representative:	Carl Whitehouse
Organisation:	First Utility
Date of Representation:	09 February 2017
Support or oppose implementation?	Support * <i>delete as appropriate</i> 0602 - Qualified Support * <i>delete as appropriate</i> 0602A - Support * <i>delete as appropriate</i>
Alternate preference:	<i>If either 0602 or 0602A were to be implemented, which would be your preference?</i> 0602A* <i>delete as appropriate</i>
Relevant Objective:	d) None* <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)

First Utility supports the intentions of both modifications and believes they will fulfil the relevant objectives of the UNC. We are however concerned by the limited objection window defined within UNC 0602. The 2 day objection window defined within UNC 0602A offers more assurance to shippers that the objections process will operate with limited risk and help ensure erroneous transfers will be kept to a minimum.

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

This change modification has a material impact on shippers and so requires Authority consent.

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

We would like to see an immediate decision made so that we have sufficient time to ensure our processes are aligned in readiness for Project Nexus Implementation Date.

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

We expect to see more Erroneous Transfers through the Non-Effective Day period if UNC 0602 is implemented. This would have a detrimental impact on consumers and likely adversely affect their confidence in the industry.

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

Yes

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.

First Utility has processes in place to ensure objections are raised within the specified timings of UNC 0602. However, we are concerned that if the entire industry is not comfortable with the timings then we could see an increase of erroneous transfers during this period. We believe UNC 0602A provides ample opportunity to fulfil this temporary objections process.

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.*

N/A

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

N/A