

Representation Draft Modification Report

Modification 0513 - UK Link Programme (Project Nexus) - Independent project assurance for Users.

1. **Consultation close out date:** 3rd September 2014
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:**
Gazprom Energy
Bauhaus, 5th Floor
27 Quay Street
Manchester
4. **Representative:**
Steve Mulinganie
Regulation Manager
stevemulinganie@gazprom-mt.com
07590 245 256
5. **Date of Representation:** 2nd September 2014
6. **Do you support or oppose Implementation:**
We give **Qualified Support** to implementation
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
Whilst we support the need for an enduring independent industry Project Assurance function within Project Nexus we question the approach being taken to achieve this as we believe powers already exist to request information from industry parties. In particular we are concerned that the scope of the Project Assurance task specifically excludes Xoserve's own readiness and that the proposal proposes to introduce additional charges to Shipper Users in addition to the circa £90m already provided to deliver the UKLink programme.
8. **Are there any new or additional Issues for the Modification Report:**
We are concerned over the very short notice provided to review and comment on the proposed modification. The proposal itself was sent to the joint office late in the afternoon before the Modification Panel and this left no time for the Panel to review and seek views from constituents. The short consultation window will also limit the level and quality of response from industry parties.
9. **Self-Governance Statement Do you agree with the status?**
Not applicable

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the proposer, that the proposal could be seen to be positive for relevant objective (f)

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We will incur costs supporting the Project Assurance task however we do not consider these to be material.

We do not agree that the proposal should introduce specific costs on Shipper Users. We believe that holistic Project Assurance should be an integral part of the industry UKLink programme which has already been funded.

12. Implementation:

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

We believe that an independent Project Assurance report on industry readiness should be produced no later than the end of 2014.

13. Legal Text:

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

We have not reviewed the Legal Text provided. However we would note that contrary to the Legal Text Guidelines Document, a commentary explaining how the text was developed to deliver the intent of the modification has not been provided

14. Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.

No.