### **Representation - Draft Modification Report UNC 0606S**

# National Grid Gas plc and National Grid Gas Distribution Limited transitional invoicing arrangement post Project Nexus implementation

#### Responses invited by: 5pm on 06 April 2017

To: enquiries@gasgovernance.co.uk

Representative:	Maitrayee Bhowmick-Jewkes
Organisation:	Npower
Date of Representation:	06 April 2017
Support or oppose implementation?	Support
Relevant Objective:	f) Positive/

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

Npower supports this modification as no other viable solution has been identified to provide arrangements for the invoicing of Transportation Charges by National Grid Gas plc and National Grid Gas Distribution Limited following Nexus implementation. National Grid's sale of its Distribution Network has resulted in multiple invoicing changes for shippers and the costs of implementing these changes have had to be absorbed by them and their customers.

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

As there is no material impact, this modification should fall under self-governance.

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

Implementation should be aligned with Project Nexus Implementation Date or earlier.

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

We expect we will have to make some system changes and will incur associated costs.

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

Yes

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

Q1: In order to inform consideration of the governance, please provide views on the materiality of the impacts of the proposal.

Npower has not been able to identify any material impact from this modification.

Q2: Respondents to identify the extent of the impacts on their systems.

We expect we will have to make some system changes and will incur associated costs.

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.

No

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

N/a