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Your Reference:UNC Modification Proposal 0531

UNC Modification Proposal 0531 – Provision of an Industry User Test System

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal for which National Grid Gas Distribution (NGD) would like to support.

Do you support or oppose implementation?

Support

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

The proposal provides for an enduring test environment to be made available to all Shipper Users Post Nexus go live. The requirement, which we support, was not anticipated by industry during early Nexus development work and as a result was not programmed in. Implementation of this modification will fulfil Shipper Users requirement for an enduring testing environment.

Relevant Objectives:

d) Securing of effective competition:

- (i) between relevant shippers;
- (ii) between relevant suppliers; and/or
- (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

f) Promotion of efficiency in the implementation and administration of the Code.

NGD concurs with the comments in the Draft Modification Report concerning the facilitation of these relevant objectives.

Impacts and Costs:

We agree with the statement in the Draft Modification Report concerning the funding of this Modification Proposal and we have no further comment in this respect.

Implementation:

The modification expresses an aspiration that the proposal be implemented at the 'earliest practical opportunity'. Implementation timescales are likely to remain challenging as Xoserve time/resources are currently prioritised in ensuring the core Project Nexus requirements can be met. We would anticipate that as the Core Nexus delivery is the priority that an implementation date for the test environment is likely to be some time after Project Nexus Implementation Date (PNID).

Legal Text:

NGD is satisfied that as provider, the legal text as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

Views on errors or omissions in the Modification Report which should be taken into account:

We have not identified any such errors or omissions.

Additional analysis or information to support your representation:

We have nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 655299 (andy.clasper@nationalgrid.com) should you require any further information.

Yours sincerely,

Andy Clasper
National Grid Distribution