

Bob Fletcher Joint Office of Gas Transporters 31 Homer Road Solihull B91 3LT National Grid Hinckley Operational Centre Brick Kiln Street Hinckley LE10 0NA

National Gas Emergency Service - 0800 111 999* (24hrs) *calls will be recorded and may be monitored

Chris Warner
Stakeholder Delivery, Operate &
Maintain
Distribution
chris.warner@nationalgrid.com
Direct tel +44 (0)1926 653541

www.nationalgrid.com

5th July 2016

Your Reference: UNC Modification Proposal 0578

<u>UNC Modification Proposal 0578 - Project Nexus – Implementation of Retrospective Invoice</u>
<u>Adjustment arrangements (Project Nexus transitional modification)</u>

Dear Bob,

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

Do you support or oppose implementation?

Support

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

NGGD believes that the measures identified within the Modification Proposal are fundamental to facilitating the timely implementation of Project Nexus.

Implementation

This Modification Proposal can be implemented with immediate effect.

Impacts and Costs

No requirement for User Pays arrangements to apply has been identified.

Legal Text

NGD is satisfied that the drafting and legal text commentary contained within the Modification Proposal meets the requirements of the Modification.

Are there any errors or omissions in this Modification that you think should be taken into account?

We have not identified any errors or omissions within this Modification Proposal.

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

We note Ofgem's decision letter dated 30th June 2016 which sets out their decision to defer implementation of Project Nexus to early 2017.

We would like to highlight that this Modification Proposal is sustainable irrespective of the actual date of Project Nexus implementation in that the relevant legal text is predicated on the Project Nexus Implementation Date (PNID) for which the actual date which is then separately defined within the UNC (General Terms Section C). The same applies to the Retrospective Data Updates (commonly termed RAASP) for which a separate implementation date is identified in Transition Document Part IIC Section 23.1.

We do not believe any additional analysis is necessary.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 653541 (chris.warner@nationalgrid.com) should you require any further information.

Yours sincerely,

Chris Warner Stakeholder Implementation Manager, Distribution