

Bob Fletcher  
Joint Office of Gas Transporters  
31 Homer Road  
Solihull  
B91 3QQ

27 March 2014

Dear Bob,

**Re: UNC Modification Proposal 0491 - Change implementation date of Project Nexus to 1st April 2016**

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) **supports** this Modification Proposal. Please find below NGN's comments in respect of the Modification Proposal.

**NGN supports this Modification proposal.**

**Summary of key reasons:**

The Change Overview Board of 3 March 2014 discussed the dual implementation of Project Nexus and the EU CAM Network Code changes set for 1 October 2015. There is growing concern that the joint implementation of these changes is leading to a higher than acceptable risk of project failure for both projects.

By decoupling the projects and delaying the implementation of Project Nexus it will mitigate the risk against failure of the EU CAM Network Code changes, which are of a legislative nature and therefore statutory.

**Additional or new issues:**

NA

**Self Governance Statement:**

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

NA

**Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

Condition	Description	NGN View
A11.1(a)	Efficient and economic operation of the pipe-line system	
A11.1(b)	Efficient and economic operation of the combined pipe-line systems	

A11.1(c)	Efficient discharge of the licensee's obligations	Positive – it will help mitigate against failure to implement statutory EU legislation.
A11.1(d)	Securing effective competition: i) Between shippers ii) Between suppliers iii) Between DN operators and shippers	
A11.1(e)	Provision of economic incentives for security of supply to domestic customers	
A11.1(f)	Promote efficiency in the implementation and administration of the UNC	
A11.1(g)	Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-Operation of Energy Regulators	Positive – it will help ensure compliance with statutory EU legislation.

**Impact and costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

NA

**Implementation:**

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

We are satisfied with the lead-time outlined in the proposal.

**Legal Text:**

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

Yes

**Any further information:**

NA

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,



Alex Ross-Shaw  
Network Code Officer