## **Representation - Draft Modification Report 0532**

## Implementation of Non Effective Days (Project Nexus transitional modification)

Responses invited by: 15 January 2016	
To: enquiries@gasgovernance.co.uk	
Representative:	Colette Baldwin
Organisation:	E.ON
Date of Representation:	4 <sup>th</sup> January 2016
Support or oppose implementation?	Support
Relevant Objective:	d) Negative – effectively limiting the ability of the supply point register to be updated may be detrimental to supply competition, therefore this modification does not, on its own facilitate supply competition.
	<b>f)</b> Positive – Clarity and certainty about what business processes need to be suspended to allow the managed transition to the new arrangements is clearly very important and therefore we agree that this modification facilitates efficiency in the administration of the network code.

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

We support this modification as it allows for a managed introduction of the changes delivered by the UK Link Replacement Programme (Project Nexus).

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

We need clarity on the dates when central systems will be unavailable as quickly as possible and therefore would support a decision as soon as possible in order that we may prepare plans for our business processes and manage any system constraints this modification introduces.

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

There are considerable impacts associated with such a large number of non-effective days, however the assessment of the costs have not been ring-fenced separately from the wider Nexus delivery costs, therefore they cannot be separately attributed to this modification.

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

Yes

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