

Consultation Response

iGT102: Enduring solution for provisions that allow Contingency Invoicing in the event of System Failure by the CDSP

Responses invited by: 06/12/17

Respondent Details

Name: Maitrayee Bhowmick-Jewkes

Organisation: Npower

Support Implementation ☐

Qualified Support ☒

Neutral ☐

Do Not Support ☐

Please briefly summarise the key reason(s) for your support / opposition

Npower supports this modification generally. However, we are not entirely sure that this modification is necessary as it is a solution to an event that is extremely unlikely to occur.

We do understand that since this topic was raised pre-Nexus go-live, that the iGTs would want some reassurance in the event of a system failure. The modification addresses accuracy of estimates to some degree by basing any contingency estimates on previous actuals. It also maxes out any contingency invoicing to a six month period per system failure.

On this basis, we do not see any reason to not support this modification. However, we have stated qualified support as we believe that raising this change is superfluous.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

Yes

Please state any new or additional issues that you believe should be considered

N/A

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Positive

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

We do not believe there will be major impacts or costs for implementing this change at this time.

Implementation

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

At least 6 months from approval.

Legal Text

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

Yes

Further Comments

Is there anything further you wish to be taken into account?

No

Responses should be submitted by email to IGTUNC@gemserv.com