

Interim Review Group Report
Review Group 0028
Review Of Section Q for Compliance with HSE Regulations

Work to date

The Review Group last met on 14th May 1997 and concluded that it has achieved as much as is practical at the current time, and no more group meetings are scheduled.

Section Q has now been redrafted to take account of the recent developments of the safety management framework within the industry and is now consistent with the content of the NEC Safety Case, the Transco Safety Case and the actions described within the Transco Network Gas Supply Emergency Procedures (E1). This primary objective of the Review Group is now essentially complete, but may require further changes in the immediate future, depending on the outcome of modification proposal 151a, which proposes amendments to the end user fax requirements for emergency contact purposes.

In addition to this task, a great deal of time has been spent considering the implications of changing the interrelationship of certain commercial decisions with regard to the physical process of emergency management. In particular the following areas have been extensively discussed:

Code Suspension

A particular area of interest has been the appropriateness of suspending large parts of the Code (Flex mech, energy balancing etc.) in order to facilitate both emergency interruption and firm load shedding. Despite the obvious benefit of being able to shed several large loads (typically VLDMC) and control a situation without suspension of the code. It was felt that the opportunity for shippers to both gain and lose from potentially large system prices was discriminatory, dependant upon a shippers portfolio, and that it was not appropriate for such large potential gains and losses to be made as a result of such an infrequent situation. The group in fact highlighted scenarios where shippers could " game " such a situation and felt that this was not acceptable when the integrity of the Network is at stake.

As a result no changes have been made in the area other than to align the process to the new safety management regime.

Code Reinstatement

The group has considered at length the timing of reinstating the code at the end of an emergency. It has been acknowledged that it is not appropriate to maintain the suspension of the commercial regime until the emergency situation is completely resolved, as after a period of load shedding it could be some weeks before all supply points have been reinstated. The option of restarting the commercial process's at the

beginning of the reinstatement stage of the Transco emergency procedures received consideration but was concluded to be inappropriate as it is physically driven and will not be primarily influenced by the demand requirement of individual shippers. In conclusion it has been considered to be only appropriate to restart the commercial processes when Transco are able to provide reliable system demand estimation, and there is confidence that the information available to shippers to prepare a daily gas balance is robust. As this time will vary depending upon the nature, duration, and principal locations of an emergency, it is not practical to be any more specific or mechanistic with regard to reinstatement.

Conclusions

The group believes that it has now resolved or is unable to resolve in the light of other developments and future developments, the issues the section Q review group set out to discuss. As such, the final review group report will be submitted to the August modification panel.

One aspect of emergency management which was not due for consideration within the Section Q review was the nature of emergency contact information, as it was felt that the existing provisions were sufficient. However, it became apparent that this current requirement was at odds with the guidelines put forward by Customer Portfolio Management (CPM). These requirements were subsequently reconsidered by Transco and a simplified and less onerous framework has been included in the proposed Section Q redraft. The issue of a fax requirements for all large firm sites has however been raised within modification 151 and will be further considered within development group 151a. It is hoped that this issue can be resolved in a relatively short space of time and its conclusion incorporated in the proposed redraft of section Q. If this does not prove to be the case then the redraft of section Q and the final modification report will be submitted in August regardless of the outcome of 151a and subsequent modifications may be required.