

Draft Modification Report
Notification to Users of Emergency Incidents - Impacts on Code Communications
Modification Reference Number 0033
Version 1.0

This Draft Modification Report is made pursuant to Rule 7.3 of the Modification Rules and follows the format required under Rule 9.6.

1. The Modification Proposal

The proposer believes that Modification of the Uniform Network Code (UNC) is required to enable the notification of emergency incidents to Users in accordance with the document – 'Schedule for Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency' (to be referred to within the UNC as the 'Shipper Incident Communication Procedure'¹).

Pursuant to the implementation of Modification 0649 notifications will be required to be issued pursuant to the rules contained within the Schedule. Transco has elected to implement these requirements by developing an Internet based incident reporting system. This will incorporate an e-mail alert facility to enable Users to be informed of relevant incidents. It is anticipated that other Transporters will inform Users of the method of code communication each choose to use in accordance with the Schedule.

It is proposed to extend the current allowable forms of Code Communication to incorporate Internet/e-mail for the communication to Users of emergency incidents as detailed within the Schedule.

In absence of this Modification, Relevant Transporters would not be able to utilise Internet/e-mail based communication to adhere to the provisions relevant to emergency incidents. The UNC specifies that Code Communications may only be made 'by UK-Link Communication' (in accordance with Section U) or 'by delivery or by post or facsimile'. Currently, Internet based communications are not included within the above definition.

¹ The schedule is to be introduced within the remit of Network Code Modification Proposal 0649 'Referencing Incident Notification Within Network Code' and is planned for implementation on 1 October 2005.

1 Note. The numbering reference in the Modification 0649 legal text is to V5.11 but use of this numbering is no longer possible. The text to be inserted upon implementation of Modification 0649 will be the subject of a Consent to Modify which will alternatively advocate insertion of the text into TPD section V5.13 .

2. Extent to which implementation of the proposed modification would better facilitate the relevant objectives

Network Code Modification 0649 is scheduled for implementation on 1st October 2005. The Proposal develops Transporters' existing obligations to provide communication to Users upon the occurrence of Loss of Gas Supply incidents and incidents of Carbon Monoxide Poisonings. A new obligation to issue a communication to Users in the event of gas fire/explosions is also required in the above Proposal.

Changes to the UNC are required to ensure that where supporting Internet based systems functionality is utilised by the Relevant Transporter to deliver communications required by rules contained within the Schedule, this is identified within the UNC as a means of Code Communication. Transco believes that the measures identified within this UNC Modification Proposal ensure that Users are able to access data made available by the Relevant Transporter. Transco thus assess that full availability and transparency of information in these circumstances furthers the GT Licence 'code relevant objective' of securing competition between relevant shippers as set out within Standard Special Condition A11 of the Gas Transporters Licence.

3. The implications of implementing the Modification Proposal on security of supply, operation of the Total System and industry fragmentation

No implication on security of supply or operation of the total system has been identified. As a consequence of industry fragmentation, expansion of the allowable forms of 'Code Communication' for the purposes of incident communication would afford each Transporter choice as to by what means such communication is delivered.

4. The implications for Transporters and each Transporter of implementing the Modification Proposal, including

a) implications for operation of the System:

No such implications have been identified.

b) development and capital cost and operating cost implications:

The Proposal would not impose any additional cost for Transporters other than that already required in order to implement Modification 0649.

c) extent to which it is appropriate to recover the costs, and proposal for the most appropriate way to recover the costs:

No such cost recovery is anticipated.

d) analysis of the consequences (if any) this proposal would have on price regulation:

No such consequences have been identified.

5. The consequence of implementing the Modification Proposal on the level of contractual risk of each Transporter under the Code as modified by the Modification Proposal

Implementation of this Modification Proposal would not increase the level of each Transporter's contractual risk. If implemented, the Modification would allow Transporters additional choice as to the method of delivery of a contractual obligation.

6. The high level indication of the areas of the UK Link System likely to be affected, together with the development implications and other implications for the UK Link Systems and related computer systems of each Transporter and Users

No changes would be required to the UK-Link System to facilitate implementation of this Modification Proposal.

7. The implications of implementing the Modification Proposal for Users, including administrative and operational costs and level of contractual risk

It is expected that Users would need to ensure effective procedures are established to receive relevant information from Transporters. In the event of implementation of the Proposal, such procedures may need to accommodate information transmitted by email/internet in addition to the existing forms of 'Code Communication'.

8. The implications of implementing the Modification Proposal for Terminal Operators, Consumers, Connected System Operators, Suppliers, producers and, any Non Code Party

No such implications have been identified.

9. Consequences on the legislative and regulatory obligations and contractual relationships of each Transporter and each User and Non Code Party of implementing the Modification Proposal

No such consequences have been identified.

10. Analysis of any advantages or disadvantages of implementation of the Modification Proposal

Advantages:

- o Enables Transporters greater choice in respect of the method of communicating relevant information.
- o Use of internet/email would realise communication efficiencies associated with such electronic communication.
- o Users would be able to access a 'real time' source of data to obtain incident updates.

Disadvantages:

- o Potential requirement for Users to manage/process incident communications received by additional means.

11. Summary of representations received (to the extent that the import of those representations are not reflected elsewhere in the Modification Report)

Representations are now invited.

12. The extent to which the implementation is required to enable each Transporter to facilitate compliance with safety or other legislation

Implementation is not required to facilitate such compliance.

13. The extent to which the implementation is required having regard to any proposed change in the methodology established under paragraph 5 of Condition A4 or the statement furnished by each Transporter under paragraph 1 of Condition 4 of the Transporter's Licence

This Proposal is not required to facilitate any such change.

14. Programme for works required as a consequence of implementing the Modification Proposal

No programme of works would be required to enable implementation of this Modification Proposal.

15. Proposed implementation timetable (including timetable for any necessary information systems changes)

To the extent that this Proposal addresses a requirement associated with implementation of Modification 0649 (anticipated 1 October 2005), this Modification Proposal may be implemented with effect from 1 October 2005.

16. Implications of implementing this Modification Proposal upon existing Code Standards of Service

No such implications have been identified.

17. Recommendation regarding implementation of this Modification Proposal and the number of votes of the Modification Panel

19. Text

Legal Text

UNC General Terms Section B, Paragraph 5.1

Paragraph 5.1.1 (c) delete “or”

Paragraph 5.1.1 (d) add “; or”

Add new sub paragraph (e) to read:

“(e) for the purposes of TPD Section V5.[13].3² only, by such methods as set out in the Shipper Incident Communication Procedure.”

TPD Section V5.[13]

Add new sub paragraph 5.[13].3 to read:

“5.[13].3] The Shipper Incident Communication Procedure shall contain the methods by which a User may obtain the information set out therein.”

² Note. The numbering reference in the Modification 0649 legal text is to V5.11 but use of this numbering is no longer possible. The text to be inserted upon implementation of Modification 0649 will be the subject of a Consent to Modify which will alternatively advocate insertion of the text into TPD section V5.13 .

Representations are now sought in respect of this Draft Report and prior to the Transporters finalising the Report

Subject Matter Expert sign off:

I confirm that I have prepared this modification report in accordance with the Modification Rules.

Signature:

Date :

Signed for and on behalf of Relevant Gas Transporters:

Tim Davis
Chief Executive Joint Office of Gas Transporters

Signature:

Date :

