

Representation

Draft Modification Report

0470 - Notification of Minimal Safety operating gas needs of large customers

Consultation close out date: 04 April 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: E.ON
Representative: Colette Baldwin
Date of Representation: 03 April 2014

Do you support or oppose implementation?

Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

I believe this will improve the information that the Transporters have about sites and how they can respond to requests to shut down in an emergency. In the event that the Transporters can facilitate a managed shut down rather than an immediate cessation of gas flow, this will allow these large users to avoid significant financial loss and the consequential impacts to their businesses and potentially to the local economy.

Modification Panel Members have indicated that it would be particularly helpful if the following questions could be addressed in responses:

Q1: Do you consider that this change will have a material impact on either your business or competition in shipping, transportation or supply of gas, and if so, what?

No

Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the assertion that this may facilitate relevant objective A, as the Transporters will have additional information to consider in a local emergency situation which may inform their decision making processes. Additionally customers making an application to be on the System Need Register creates a natural incentive to improve the emergency contact information provision to the Transporters for these specific customers.

Impacts and Costs:

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

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The costs would be minimal, minor system changes to capture information about the System Needs Register and FTE support to manage the application processes.

Implementation:

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

We see no reason for a protracted implementation lead time, so as quickly as possible.

Legal Text:

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

Yes

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

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

No