

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: Health & Safety Executive

Representative: Mike Potter

Date of Representation: 04 Apr 2014

Do you support or oppose implementation?

Not in support

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

HSE supports the general principle of this MOD. However, HSE is unable to support its implementation until the Network Emergency Co-ordinator (NEC) is able to confirm it is able to maintain its continued compliance with its GSMR safety case in terms of co-ordinating actions and minimising safety consequences in a Network Gas Supply Emergency (NGSE) should such an event occur. This is where a NGSE event leads to a Local Gas Supply Emergency (LGSE) event. In addition, it is still unclear whether Gas Transporters (GTs) will be able to comply fully with their GSMR safety cases to co-operate with the NEC during a supply emergency and to direct sites to cease taking gas if there is ambiguity over the level of protection the MOD affords to sites.

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?

As the health and safety regulator for the Gas Safety (Management) Regulations 1996 there is impact on the safety cases of the NEC and GT as accepted by HSE: if the MOD is implemented the NEC & GTs may not be able to comply with their safety cases.

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

An NGSE event can lead to an LGSE event, so there is potential for a lack of clarity on the direction for cessation of gas to sites because in such circumstances the proposed MOD would not apply

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as compared to the occurrence of a separate NGSE event. This is not covered or explained.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Not for HSE to comment.

Impacts and Costs:

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

Not for HSE to comment.

Implementation:

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

N/A

Legal Text:

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

N/A at this time.

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.

There is not yet enough clarity in how the MOD will work or be implemented. HSE would not be able to support implementation of the MOD until it is in a form that is acceptable to the NEC and GTs in terms of them being able to continue to comply with their GSMR safety cases in the area of their obligations during gas supply emergencies.