

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: Network Emergency Co-ordinator (NEC)
Representative: Christopher Train
Date of Representation: 4 April 2014

Do you support or oppose implementation?

Oppose

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

The Network Emergency Co-ordinator (NEC) is appointed as an independent body in line with the Health and Safety Executive requirements of the Gas Safety (Management) Regulations 1996 (GS(M)R). The NEC has obligations in a Network Gas Supply Emergency (NGSE) to coordinate actions across the affected parts of the network to minimise the possibility of a supply emergency developing, and where one does develop, to minimise the safety consequences. This UNC modification introduces new arrangements for LGSE events that could result in ambiguity of GS(M)R directions to cease gas consumption in an NGSE event where the principles of this modification do not apply. Furthermore, an NGSE event could lead onto an LGSE event and the rules applicable for large consumers protected by the principles of this modification would not apply in that situation even though an LGSE had been declared. This potential for ambiguity regarding NEC direction in an emergency event is a risk that will likely grow over time as more Users assume protection via the principles of this UNC modification. The modification report states that priority arrangements for large gas consumers directly connected to Distribution Networks do not apply in an LGSE. This is not the case; priority arrangements apply in both LGSE and NGSE events.

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?

Yes. There is the potential that a direction to large gas consumers connected to Distribution Networks to cease consumption of gas following NEC direction to DNs is incorrectly challenged due to the assumed levels of protection provided by this UNC modification.

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Directions to consumers in an emergency event need absolute clarity of understanding to ensure timely action is taken.

Q2:

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

Yes. If large gas consumers believe that the existing arrangements for priority consumers as set by the Secretary of State are “inaccessible to the vast majority of Users” then this issue should be raised directly with DECC and not by way of UNC modification as it is important that the clarity of liability limits remains with DECC.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The NEC does not agree that the modification will positively impact relevant objective (a) (Efficient and economic operation of the pipe-line system.) The Draft modification report states “this proposal provides greater certainty to the transporters that a customer will reduce its gas consumption when required”. The NEC believes that this relevant objective is not positively impacted due to the potential increased ambiguity when directing customers as noted above.

Impacts and Costs:

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

None

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

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

The NEC wishes to note that all large gas consumers should have appropriate plans in place to facilitate the safe shutdown of plant and equipment in the event of gas supply failures. This modification should have no impact on this safety requirement.