

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: Scotland & Southern Gas Networks
Representative: Erika Melén
Date of Representation: 04 April 2014

Do you support or oppose implementation?

Comments

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

This modification implements a process whereby a customer can apply to the Gas Transporter to be placed on a register of sites with specific shut-down requirements to be taken into account (where possible) during a Local Gas Supply Emergency (LGSE).

The process does provide the customer and Gas Transporter formal means of communication around the customer requirements during a potential LGSE which may be of some benefit. It is however strongly noted that dependant on the type/origin of the LGSE the register may need to be disregarded for the overall safety of the network. Customers applying to join the register must be fully aware of this caveat to not have the wrong impression in regards to emergency procedures as this could cause severe issues during an emergency.

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?

Gas Transporters will be required to facilitate the application process but this is not seen as a material amount of work. As long as the relevant customers are fully informed of the network responsibilities and rights during an LGSE, whether the customer is on the register or not, then this process should not have a material impact.

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

No

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20 March 2014

Version 1.0

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the proposer that this modification may have a marginally positive impact on relevant objective a) as it will implement a formal communication route between customer (shipper) and Gas Transporter in regards to the customer system needs during a LGSE. This may help provide the Gas Transporter with further information during a LGSE which may assist any load shedding. But we do note that if the customer in question does not fully understand the caveats associated with the register i.e. that they may still be required to immediately shut-down, then this could potentially have a negative impact on the Transporters ability to effectively manage LGSE procedures.

Impacts and Costs:

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

No substantial costs are foreseen for SGN aside from administrative ones associated with facilitating the application process

Implementation:

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

We are satisfied with implementation following an Ofgem

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