

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: Wingas UK Ltd
Representative: Rob Johnson
Date of Representation: 04 April 2014

Do you support or oppose implementation?

Support

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

It is critical that both transporters and customers have prepared as much as possible to handle an emergency before its occurrence. UNC Modification 0470 will help this in a number of ways. Firstly it will allow customers to clearly communicate their gas requirements for safe and controlled shut-off prior to any emergency event. Secondly it will give transporters a clear understanding of the needs of large customers in their network and so remove any potential for any issues being raised at the last minute when these sites disconnect from the network. Finally it will provide an additional opportunity for customers to provide directly to the transporters suitable contact details for use in an emergency. Overall this process will improve the robustness of the emergency process and provide clarity to the customer on what is expected of them.

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 currently drafted no, and so this modification now seems to fit the self-governance modification criteria. We would however not wish to see the implementation of this modification delayed so that it can be reclassified.

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

We would like to note that the modification has substantially changed since originally raised. The modification, as originally drafted, would have required the transporters to provide a tranche of gas during an emergency to those DM customers it has approved. The modification as currently drafted, and as agreed by the workgroup, does not require such activities and is purely limited to information provision which will not limit the activities that a transporter will be able to undertake during an emergency in any way.

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the workgroup report's recommendations that the modification will aid the transporters in planning for emergencies and so facilitate relevant objective (a).

This modification will be beneficial to the larger end of the Daily Metered market as it will provide certainty for those qualifying customers that the transporter can be made aware of their gas needs before the emergency. This will aid these customers when planning for an emergency and so substantially increase the possibility of them resuming operations after an emergency. This maintains the viability of this market sector and so promote competition and hence also further relevant objective (d).

Impacts and Costs:

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

As this modification is limited to information provision to the transporters of customer needs during an emergency, we would face minimal costs in aiding this process.

Implementation:

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

As this modification is limited to information provision and there are no system changes we believe this modification can be implemented immediately after the decision to implement.

Legal Text:

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

Yes. As the proposer we have examined the issue on whether the legal text, as drafted, would result in any requirements on transporters to act in accordance with the information provided by the customer and so limit their actions during an emergency. We are confident that it does not and we note that the workgroup did not identify this as an issue when the legal text was developed. For the avoidance of doubt the information provided to the transporter can be disregarded for all sites if, in the transporter's opinion, the emergency warrants this and no liability will accrue for doing so.

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